Data Protection Impact Assessment

Version 2: November 2022

This document details the Loop DPIA process and outcome. It follows the process and template set out in the Information Commissioner's Office's DPIA guidance, set out in European guidelines on DPIAs.

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Part 1: Loop's need for a DPIA

Loop's independent online platform reinvents accountability in humanitarian aid and development by enabling communities to give feedback on services they receive, freely and safely.

Our goal at Loop is to make sure people can share their opinions and experiences on any issue that is important to them. It could be Thanks, a Question, a Request for Support, a Concern or it may include sensitive issues. Sensitive stories are those that would do harm if they were posted on the open platform and include reports of Sexual Exploitation, Abuse and Harrassment; reports of gender based violence; fraud or corruption allegations; misconduct etc. Loop has invested heavily in a system whereby any Sensitive Story is channelled away from the open platform and handled safely and confidentially. Thus our priority is to make sure that people can give their feedback in a safe way, to improve accountability, keep people safe and ensure survivors receive the support they need.

Loop is accessible to all: online, or by SMS, WhatsApp, Messenger or voice, in local languages and provides a completely safe and anonymous channel for the reporting of sensitive stories, all managed confidentially. It is therefore critical that Loop processes and systems adhere to the highest levels of data protection in order to keep people safe.

Our priority is to make sure people can share their opinions and experiences in a safe, open and transparent way, to effect positive social change at the individual, community and global level.

Data, Trust and Safety is at the heart of a functional Loop platform for it to add value to others, therefore analysing the Impact of Data Protection is ingrained in everything that Loop does, rather than an ad hoc project or process. Therefore this Loop Data Processing Impact Assessment is a live document being updated as we assess impact and implement new features.

This DPIA relates to the Loop platform, open and sensitive stories. That includes, any feedback/ stories received which go to the Loop open platform and statistics page, from any country, through any channel and in any language. As well as any Sensitive Stories which come through any channel in any language and are sent to Case Managers for referral and processing.

This DPIA is an open source public document, in line with our open policies and approaches and is available on the Loop website along with our Codes of Conduct,

Privacy Policy and other organisational information. It is open source because the safety of the data is important for individuals choosing to use Loop and for organisations wishing to use Loop to more effectively and efficiently engage, learn from and respond to local populations and also to access the open data confidently.

The impact of Data Protection and associated risks is an ongoing and integral part of the design and building of the Loop platform and all existing and new functionalities. With a functional product available and the main infrastructure built, we are writing up the process, findings and mitigation actions already delivered and will continue to review, reflect and improve on this, on an ongoing basis with every new functionality, country and user experience from partners and key stakeholders.

Data protection is not only about hardware and software but also about policies, behaviours, culture and communication and feedback is invited on how to improve this document, our Data Protection methods and the platform itself. Please share any feedback with alex@talktoloop.org to help us ensure the safest service possible.

Part 2: The Nature of Loop's Processing

How we collect, use, store and delete data

What is the source of the data?

Loop collects data and feedback via our platform from any user, anywhere in the world.

We work through a Charitable Franchise model where national organisations request to be the host of Loop in any given country. We then work together in partnership to build the appropriate products - languages, input methods etc - for their country needs and context.

Loop is currently actively hosted in Zambia, the Philippines, Somalia, Indonesia, Poland and Ukraine.

We currently have 15 languages on the platform: English, French, Spanish and Arabic. Tagalog, Cebuano, Bahasa Indonesian, Polish, Ukrainian, Bembe, Lozi, Chichewa, Tonga, Somali Maay and Somali Maxatiri dialects.

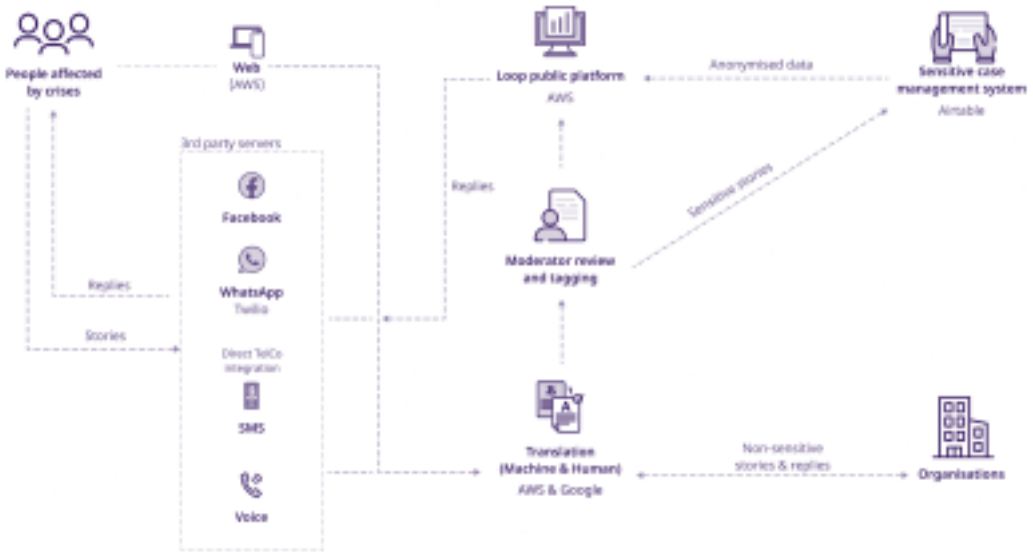
The Stories receive tags by moderators, such as Organisations who might be able to respond to the Story to offer help or support. The stories are tagged by Story Type (by the author or the moderator) and by Thematic area by the moderator to help with analysis of Stories at an aggregate level.

The author is invited to tag their story as Sensitive or not. The Moderators can also add a Sensitive Tag but they cannot remove a sensitive tag if it is created by the author of the story.

The below diagram shows the flow of information from the two main Stakeholders (people affected by crises and the organisations they are feeding back on) and what information is used.

The more detailed data is then outlined below.

Loop data flow map



Who do we share data with?

The information from the Stories submitted which are NOT tagged as sensitive, are posted on the open platform of Loop and a notification is sent to everyone who engages with the content everytime there is a new interaction to that Story thread.

Sensitive Stories are sent to the Case Manager and all data is removed from the Loop platform and moderators page. Only the Loop trained Case Managers, the CEO and one tech team member can access the Sensitive Stories Case Management Tool hosted on Airtable.

Users can only contact each other through the Loop platform, much like Twitter or Instagram. However, it first goes through a process of human moderation (unlike Twitter or Facebook) and does not post anything on the Open Loop public platform unless it meets the Loop criteria. This includes:

1) The Community Guidelines which are translated into multiple languages and dictate the type of online community Loop is trying to foster. These guidelines are linked from both the Loop website and platform, with a consent note. Any post which does not adhere to these guidelines is rejected by a Loop moderator and is not published on the platform.

2) The Moderator Protocols which are constantly updated based on learning and are open source, where we invite anyone from any community or organisation to make suggestions or discuss the Protocols guiding our decisions to post stories or not.

We have included into our policies and processes that if people share too much information that might put them at risk, the moderators can either remove tags, (which are then removed from our database) or reject the story and ask the author to resubmit in accordance with the platform protocols ensuring a safe, moderated space for all users.

We are implementing an ability for moderators to edit some aspects of a story - blank out phone numbers or last names for security purposes. The original story will remain on the Loop database but not be available for the public to see. Tags showing the post has been redacted appears on the platform. There are strict guidelines around what can and cannot be redacted with the integrity of the story and safety at the core of all decisions.

Data Collection Minimisation

The only data an author **must** share to submit a story on Loop is the story itself, of 8 characters or more. There are also options to share additional details about the story and/or author. These are all opt in and optional and are listed below. This “opt in” policy is how we minimise personal data collection, giving users full control and decision over what data they wish to share or not.

Someone (in or outside of an organisation) who is submitting a reply also only needs to write 8 characters or more and can include their reply contact details or not.

We chose to only request the minimal data points (age groups, Gender, Disability according to the Washington Definitions) even though organisations requested Loop to gather additional data points such as legal status, race, ethnicity etc. We only do this if it is voluntarily included in the text of the submitted information.

> We will only store voice recordings for the minimum time required to be able to respond to any queries about the submitted story through IVRR. At the moment we have set this at 6 weeks but hope to reduce that to two weeks when our systems are well refined and tested.

What "Opt In" data do we request & collect?

Story details

Country

Knowing the country in which the authors are located helps us to understand the context of each story, more easily tag in relevant organisations who might be able to respond and provide better support. We automatically detect a user's country by using the IP address of the device and the author is given a choice to include it. They must consent for it to be included. The address can also be changed.

Location

Loop uses approximate location to encourage organisations near the author to respond to the story and provide support. Based on the location entered, we use the Google Places API to identify the closest village/town/city and then contact the local organisation to make them aware of the feedback and invite a response.

Information on precise locations are not stored or shared. We do not store geolocation; rather, we use runtime user geolocation for a geocoding which we round up to at least city level to avoid possible user identification. This means that only approximate locations will be displayed alongside stories if the author chooses to enter it.

Organisation

Users tagging an organisation in a story helps Loop encourage organisations to respond and thus close the feedback Loop, incentivising further feedback. A registered organisation that gets tagged is automatically notified of the story and a

non-registered organisation that gets tagged will receive an email from the moderator, inviting them to join and respond.

This helps Loop show who is listening and responding to stories.

Authors can identify the organisations to which they intend to direct the story and Loop or anyone else can tag in or suggest other organisations that might be interested in or be able to help answer the story.

Author details

This data allows organisations to see who is being listened to and better understand who is not able to share their voice and experiences and feedback. Then better targeting of activities to better listen to marginalised voices can take place.

Name

This helps to make any interactions more personal or to see common stories from the same author. Authors can choose to share their full name, use a nickname or remain anonymous. If they share a name, it is displayed alongside the story.

Moderators can redact some aspects of the name if this puts the author at risk (ie: remove the last name). This is assessed differently in each context with relevant country level guidance.

Names of staff or organisations are input by the individuals themselves and are stored in Airtable only. This is because they would like to be notified if their organisation is tagged in a story. This is optional.
Only the Data Owner and Data Processor have access to these numbers.

Phone number

Providing a phone number is important so that the replies to the original stories can reach the authors and the feedback loop can be closed. It removes the extractive nature of some feedback mechanisms.

If an author shares their phone number and consents to being contacted, we will notify them when/ if anybody replies.

Phone numbers are stored on the Loop encrypted and separate database and are not available to any user or moderator. They can only be seen by the Data Owner and Data Processing Manager.

Numbers are never published online, and we will never share phone numbers from open stories with anyone. Other users can only contact an author by using the Loop platform.

If it is a Sensitive Story, the Case Managers can see the phone numbers once it has been sent to the Sensitive Story Case Management Tool hosted on Airtable. All data is removed from the Loop Moderators platform. Authors are asked if it is safe to contact them back. Their response appears in the Sensitive Stories Case Management Tool.

If an author includes their phone number in the main text of their story, the moderator can 'unpin' the information or redact the number from the main text of the story before posting it. The original story is saved on the system but not available for the public.

Individual phone numbers related to an individual case that has been sent to the case management system are shown only on the Sensitive Stories Case Management Tool where only Case Managers have access to them. The case management tool is built using Airtable which is GDPR compliant.

Phone numbers of organisations are input by the individuals themselves and are stored in Airtable only. This is because they would like to be notified if their organisation is tagged in a story. Organisations can share their email and not a phone number. This is optional.
Only the Data Owner and Data Processor have access to these numbers.

Email address
Similarly, providing an email address is important so that the feedback loop can be closed to authors and they can be included and participate in ongoing discussions. It removes the extractive nature of some feedback mechanisms.

If an email address is provided the author will be notified of replies. They can unsubscribe from these notifications at any time. The email address is not published online, and Loop will never share the email address with anyone. People can only contact an author by using the Loop platform.

Email addresses of organisations are input by the individuals themselves and are stored on Airtable only. This is because they would like to be notified if their organisation is tagged in a story.
Only the Data Owner and Data Processor have access to these addresses.

Data which is tagged:

Physical or mental health condition
People who have a physical or mental health condition are often treated differently. If we know about this, we can try to find a specialist organisation that can better meet their needs. We also display this data on our statistics page from tags placed by the author or moderators. Data used on our statistics page helps people and organisations understand who is using Loop and what their specific needs and experiences are. It helps organisations target these lesser heard populations more specifically to better meet their needs.

We follow the approved Washington Definitions for the tag names and we ask if someone self identifies as having a disability. If they choose to disclose this, the tags they choose are added to their story. These include:

- Seeing
- Hearing
- Mobility / Dexterity
- Learning / Understanding
- Selfcare
- Speaking
- Other

Gender
People of different genders are often treated differently and require different types of support. If we know about this, we can try to find an organisation that can better meet their needs. We display an overview of gender data in our statistics page from tags added by authors or moderators. The options include:

- Female
- Male
- Non binary
- Prefer not to answer

Age
People who have different ages are often treated differently. If we know about this, we can try to find an organisation that can better meet their needs. We display an overview of age data in our statistics page from tags added by authors or moderators. The options include the following age ranges:

- Between 14 - 17
- Between 18 - 29
- Between 30 and 59
- 60+

- Prefer not to answer

Who is responsible for keeping Loop data safe?

The Managing Director of Loop is the Data Owner. She reports to the Governing Board every 2 months and this includes reporting on the data management risks, which are stored on the Loop Risk Register, which includes risks on Data Protection, reputational damage, partnership approaches and others.

The Loop Risk Register is a spreadsheet that is accessible and available for all Loop staff to contribute to and comment on and is reviewed every 6 months.

Elite Crew, an independent Company managing the Technology behind Loop is the Data Processor. This is managed under a contract between the two organisations which includes a weekly Technical meeting reviewing learning, technology, new improvements and the pipeline of work.

There is a legal agreement between Loop and Elite Crew with regards to confidentiality and data management. It specifies that Elite Crew staff are not permitted to share any data beyond the relevant colleagues working on Loop activities.

Loop has additionally recruited a Technology Adviser to the Loop Advisory Board to provide secondary opinions and advice in an ongoing manner.

The Loop moderators are employed contractually by the host organisations in each country.

Loop Sensitive Case Managers are employed directly by Loop.

All staff and partners sign the Loop Policies and Codes of conduct which includes confidentiality requirements. They also attend Safeguarding training and Data Management Training which covers the Loop Data Management Policies.

What data do we store and how do we keep it safe?

Loop is constantly learning and we aim to deliver on the Privacy by Design approach. To keep the platform safe and secure we execute monthly security maintenance reviews and internal audits. For any new features we implement external audits to verify and identify any potential vulnerabilities that were not already identified by the designers and developers. This includes ongoing penetration testing.

There is a Code of Conduct that all Loop staff sign and this contains provisions on confidentiality and the handling of data. We have discussions on confidentiality with all Case Managers who have additional access to data - specifically the Sensitive Stories. All case managers have attended high level training and are professionals in the area of Case Management, Safeguarding, etc.

All Moderators and Case Managers have talktoloop.org email addresses and only have access to shared Loop documentation through this email address. Moderators must only use talktoloop.org emails when exchanging anything about a sensitive story. This is part of the onboarding and induction process and revisited during Data Privacy training sessions.

Where do we store our data?

We store all of the above data on the Loop database, hosted on AWS in Frankfurt Germany (in the European Union) and as such our storage methods align with GDPR guidance. The AWS infrastructure provides security levels through their infrastructure. Additionally we use encryption at the database level as a further measure of data security.

Additionally we store Sensitive Stories data on Airtable in the Loop Case Management tool.

We encrypt all the data we store; nobody apart from senior platform managers can access the information. Phone numbers and emails can be accessed by senior platform managers only and, where required, the designated case manager to process a sensitive story and address appropriate services.

We use the following services to host data and files that enable Loop to run:

Amazon Web Services (AWS) (Amazon Web Services, Inc.)
AWS processes Loop's data in Frankfurt, Germany. Processing data includes collecting, recording, organising, storing, adapting, using, making available, erasing or destroying personal data. For more information visit the EU Website. The AWS Privacy Policy is amongst the best and most transparent that was reviewed. They state, with respect to content, that customers wholly own their own content. AWS never accesses our content without consent and does not derive information from it. We also remain the data controller for our content. All the services that Loop is using with AWS are compliant with ISO 27018:2019.

Amazon Simple Email Service (Amazon)
We use this service to send account activation emails so people can set up a password to their Loop accounts. Read more about the Amazon Simple Email Service Privacy Policy.

Mailjet
For other email communications we use Mailjet, a cloud-based email delivery and tracking system. Mailjet is GDPR compliant. Their Privacy Policy is clear that they do not share data or contacts outside of legal situations where they have no choice.

Cookie policy
TalktoLoop.org uses trackers, including cookies. Loop only uses trackers directly managed by us and which are strictly necessary for making the platform run. We do not allow any third party trackers, so advertisers and analytic systems do not track Loop data.

Airtable
The Airtable Privacy Policy is clear and detailed. We have opted out of advertising and google data collection. Airtable actively deletes personal information that belongs to children.
We use Airtable for the Sensitive Stories Case Management Tool.
We use an Airtable database to gather email addresses of organisations wishing to be notified by Loop of new stories. We store names, emails and phone numbers from consenting people.
All Airtable data is only accessible to specific Loop staff, via two factor authentication.
The sign on process will be improved in future updates.

CloudFlare

Couldflare have a very strong reputation for insulating businesses and organisations from attack. Their Privacy Policy is very clear that they do this without compromising data.
We use Cloudflare as an additional security to protect the platform from DDoS attacks. It brings many additional security features.

Microsoft

We have limited our third party activities with Microsoft due to their lack of transparency, fragmented nature of sharing enough relevant information relating to data sharing or data processing.

Google

We limit our use of Google to Google WorkSpaces for internal email and internal shared file storage among Loop staff.
We manage Loop accounts here to ensure staff access to Loop files and services is managed from a single central location.

Email addresses and phone numbers are stored:

- In the Loop system Database - this is used by the system to automatically notify users when a story is published/rejected or when a reply to a published story comes in and is also published.
  Only the Loop Data Owner and Data Processors have access to these.
- In Airtable for SignUp processes -we store emails, phone numbers and names, if they choose and consent to sharing them, to create Loop accounts for the user
  Only the Data Owner and Data Processor have access to these.
- In Case Management System - created in Airtable - to process sensitive stories
  Only the Loop Case Managers, Data Owner and Data Processor have access to this.

For additional security we have enabled two factor authentication for AWS and for Airtable.

What data do we share?

If there is a request for data to be shared, this is only done with informed consent of the author and all involved. Consent is requested privately (not on the Open Loop platform) and may be attempted using any contact method that has been shared with us (email, phone, text, via personal message on the platform). If there is no response from an author, we do not share the requested information unless we assess a potential risk, in which case an individual risk assessment is carried out by a Case Manager in conjunction with the Loop Managing Director.

Information Quality and Accuracy

Moderators are national people who can identify local nuances.
Loop is hosted within a national infrastructure to tap into networks of local actors with knowledge and contacts to support the roll out and referral mapping for Loop.

If an individual states that they are registering as an employee of an organisation we review the shared information; information on the web and within our networks to authenticate that the email address/ person is associated with that organisation. We may also email the individual asking for evidence. This is not a foolproof process as many staff working for small local organisations do not have work emails and their organisation does not have a website but operates through a Facebook page.

With additional funding we will design a new registration process and try to make the authentication of people registering as an organisation more robust.

We have monthly Moderators training across the country teams to learn from each other, train on new improvements to the technology, and ensure a consistent high standard of moderation.

We can pull back posts to be moderated again or rejected if an issue is flagged or if more information comes to light.

We constantly improve and update the Protocols based on learning and improvements to the technology. For example we just implemented a way to retract phone numbers from a story to ensure no Personal Identifiable Information is posted.

The tech identifies if there are too many posts coming from one IP address and blocks it. Moderators reject repetitive submissions or strange patterns of posting stories and rejects these where appropriate, explaining why.

Data Access, Retention & Deletion

Anyone can request us to remove, change, re-tag or delete completely, anything that they shared. This is done by moderators with no questions asked and then sent to the Data Owner to address data update requests.

Anyone can also request us to remove a post that they did not write if they feel that it does not meet the Community Guidelines, Moderator Protocols or could do harm in some other way. These requests will go to a Case Manager to review and implement or reject with a reason based on each individual context. The author and requesting actors' views, among others, will be sought. As a result of such requests we will review our Policies and improve them if needed.

Loop will display people's stories and the data associated with them (time stamps and tags) for as long as Loop exists. This is because longitudinal, qualitative data is important to look at trends over time and changes in what local people have chosen to share. This can help to inform what works, what is funded and what needs additional funding and attention. We delete phone numbers and emails when they will no longer be needed to provide services to the author (e.g. when a case is concluded). The time before deleting these will be reviewed at the end of 2022 based on experience up to that date.

If Loop ceases to exist and no longer pays for Amazon Web Services to host the platform, we may export or download data to be stored safely for as long as is legally required and then delete it permanently.

Part 3: The Consultation Process

Stakeholder Groups

Loop has three key stakeholder groups:

1) People affected by crisis
2) Organisations working to help people affected by crisis
3) Donors and any others wishing to use the data in their work and decision-making processes - research, policy, advocacy etc

People Affected by Crisis

Loop has consulted with people affected by crises in Somalia, the Philippines, Zambia and Ukranians in Poland. In each of these populations we hired external facilitators through national tech organisations or used our own local staff to manage feedback sessions in the local language(s).

Going forward we will always use this model of listening to local voices and experiences from a wide cross section of society through safe locally managed processes.

We also had input four times per year from the Loop Governing Board who come from affected communities and were invested in Loop's success, representing for example: Yemen, Zimbabwe, Uganda, Syria and The Philippines.

In each country many people were consulted and represented:

- all age groups (from 14 up to 70),
- genders (including LGBQTI+ communities in countries where it is illegal),

- disabilities
- IDPs, refugees and host communities
- ethnic minorities or persecuted communities
- rural and urban communities and camps (IDPs and transit centres)

We also sought information from people affected by:

- human rights abuses
- poverty
- exclusion
- Gender based violence
- emergency response and sudden onset disasters
- conflict, etc

This feedback then informed our prototyping and approach to the design of Loop. We went back to some communities again for second and third rounds of feedback on the resulting design of Loop. This always included (but was not exclusive to) people wanting to report open as well as sensitive stories; i.e. vulnerable or marginalised populations.

With regards to data protection, we found a widespread concern about the risks of being identified by NGOs or those providing services in case there were negative implications for them (being taken off the list, abuse etc). In addition there were concerns that some community members might know their information and this could cause negative impact on them or ‘defoulement’.

We built the anonymity and opt-in (rather than opt-out) approach to data sharing as a result of this. It may result in less demographic information but puts the user's needs first.

We also built the second line of defence through hiring national moderators, who review all content before it is published on the Open Loop Platform, to help manage risks that the author may not identify themselves. They can redact some content (phone number, last name for example), or reject it and send it back to the author with an explanation of the reason for rejection. It also reinforced the need to maintain local human moderators and not move to AI for moderation too quickly.

The ability to feedback anonymously had the strongest positive reception in every country for local people of all types.

Accessibility

Loop has had a third party expert group, run by people with accessibility issues audit the useability and accessibility of the Loop website and platform. They have provided feedback and will do a follow up review of resulting improvements. Our accessibility was audited against the WCAG 2.1 AA compliance

The WCAG 2.1 AA compliance is useful for people with additional technology to help them engage with the digital online space. Loop is also considering accessibility for those people who have difficulty accessing technology due to illiteracy reasons, having to borrow a phone, no access to smartphones etc. There are currently no standards for this but it is the prime focus for Loop as we grow and develop.

We have built interactive voice response and reply to enable people who are not comfortable expressing themselves through SMS or typing.
We will integrate systems that support text-to-speech features (Read to me button) to increase accessibility of the service to non literate, non digital or those with limited accessibility to technology for other reasons: disability etc.

Organisations working to help people affected by crisis
In the design process we also consult widely and frequently with staff at various levels (governance, legal, communications, project staff, fund writers, risk management, tech, innovation, operations management etc) of the following organisations, including:

- CSOs
- Grassroots activists
- NGOs
- Networks
- INGOs
- UN staff
- Think tanks
- Universities
- Technology leaders
- Government Authorities
- Private sector organisations
- Organisations providing feedback mechanisms and data analysis

We consulted these actors in the Philippines, Indonesia, Zambia, Somalia and Poland as well as Uganda, Yemen, Paraguay, and regional (Asia, West Africa, East Africa, Middle East, Pacific) and global headquarters. We also recruited key people onto the Loop Advisory Board who hold relevant positions in the humanitarian landscape, volunteer to share their thoughts and opinions with us and who are invited to give their input three times a year to Advisory Board meetings.

We found a widespread concern about the risk of complaints or allegations against organisations and questions about the authenticity of authors of stories. As a result we enabled the moderators to reject stories, wrote the guidelines and protocols to ensure a safe space. These tools are open documents and we invite feedback to build trust and improve them.

We enabled the Sensitive Story process where the data is removed from the platform for allegations or stories that might do harm to an individual or organisation. This risk is carefully assessed by Loop Moderators and Case Managers on a case-by-case basis. All of the data goes to a separate Case Management tool.

There were also concerns about attribution of issues that communities raise and if local actors would take the brunt of the criticism when there is a whole decision making chain and budget allocation process which involves more than one actor. For this reason we did not use a star rating system but instead used the 'Story Type' filters. This means that the statistical analysis shows the overall sentiment and pattern of stories across different demographic groups.

Also, we track response rates, are organisations replying and if so how quickly. If they are replying and the quality of their responses. This gives the organisation a fair chance of response, explanation and to protect their reputation.

There was a wish from many to be able to measure the impact and to evidence the value of getting feedback. We included in the statistical analysis a way to see how many replies (from individuals or organisations) there have been and with what delay. This is to reinforce research showing that it is not about the amount of negative feedback that you receive but more important is whether you respond, how quickly you respond and how you respond.

In the short term future, we plan to be able to tag replies based on their 'impact' - was information provided, was a referral made etc - and have this on the statistical analysis page, resulting in some possible impact information.

Longer term we would also like to use the platform to track what the original author thought of the feedback and their opinion on the impact of sharing their story. But how to do that in a way that cannot be gamed is to be determined.

We also designed a system to incentivise providing feedback even if you do not get a direct reply to your story from the tagged organisation, by openly tracking views, any replies from anyone and by having an upvote system.

Donors and others wishing to use the platform's open data in their work and decision making processes - research, policy, advocacy etc

We spoke to:

- Donors,
- Universities
- Standards agencies
- Specialist organisations working on feedback, accountability and reporting mechanisms - Feedback Labs, GTS, Integrity Action, Upinion, Care Opinion, REACH, Interpol, Resource Hub…
- Loop Advisory Board who could input three times a year collectively and at key moments
- Special workshops with key members of FCDO and the Safeguarding Unit and associated teams

This broad group's interests were primarily on accessibility to the filtering process and safely seeing both the qualitative and quantitative data to help inform analysis and extend the potential impact of the available data. It highlighted a wish to get access to the data from sensitive stories and be informed about any reported issues.

Interestingly donors felt that they would want to know and large organisations felt they should know about their down stream partners but they did not think Loop should be informing or sharing any information about their own data and sensitive reports. They said it was their own responsibility to manage communications with upstream donors safely and in accordance with their donor and other legal requirements. This was discussed at length with a variety of key actors, including Donors, large INGOs, small NGOs and others.

It was finally concluded that the confidentiality of the accusations and reporting of sensitive stories was considered not to be the responsibility of Loop as a neutral trusted platform and that the aggregated data on the statistics page of the platform would show trends by organisational type (not by individual organisation) which anyone could act upon but would not have an impact on any one organisation. We had many iterations of how to classify this data and what and who would elevate any concerns if they were not being addressed. The Accountability Flow was designed to help address this and incentivise accountable management of reports but this is still to be tested.

Loop intends to continue to learn from, consult with and improve our approaches with inputs from a wide range of users on an ongoing basis and at key points in time: new features added, new countries etc.

Testing of the Loop Systems **(Audit)**

We contracted Professor Mick Grierson, Research Leader, Creative Computing Institute from the University of the Arts, London and his team to review the Data security of our platform. These were his final recommendations on the 22nd of March 2022.

'We have run a battery of tests, including several different scanners, across Loop's systems, and examined the code for potential vulnerabilities. It took a couple of days.

We're confident that our tests found no significant vulnerabilities. Our system scans reported several issues where there could be potential risks, but after checking these manually they almost all look like low risk / guidance level, and not significant or high risk. We weren't able to penetrate the application or destabilise it significantly.

The main security improvement I would recommend would be that at times, developer credentials are hard coded into the codebase. On one occasion, the username 'admin' appears in one of the source files, and it would be better if the team could avoid hard coding / using default usernames, and double check that they're not leaving any traces with their API keys etc.'

Methodology:

Mick and his team performed security analysis based on the Open Web Application Security Project®(OWASP) top ten standard awareness procedure, with additional server and infrastructure investigation. This procedure prioritises the top ten security issues as indicated by OWASP as follows: access control, cryptographic failure, injection, design security, misconfiguration, components, authentication, software / data integrity, logging failure, and server-side request forging. They implemented:

- Analysis of IAC structure
- Service scan
- SAST (Static Application Security Testing) scan
- Result filtering (elimination of false positives)
- As the source code is predominantly in JavaScript / Typescript, they used the following analysis tools when testing;
- Npm Audit,
- Yarn Audit,
- HorusecNodeJS,

- Semgrep,
- Checkov and
- Owasp Dependency Check (v2.2)

They verified and cross-referenced these results using Insider security tools. Finally, they performed interactive testing of running source code using burpsuite.
Their service scan found that the system itself is robustly deployed and has necessary security protocols in place. No systems were compromised during our investigation.

➔ We will do similar third party testing annually
➔ We are considering to go for ISO standards certification or other

Part 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Legal basis for data processing and transfer

The overall legal framework for our processing of Personal Data is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC with related regulation.

Other potentially important legislation that also informs data policies relevant for LOOP include the Computer Misuse Act 1990 and the Freedom of Information Act 2004. This is because these earlier acts inform the GDPR and as a consequence the DPA.

The Data Controller for the processing of Personal Data is Loop - a legally registered charity called Ourloop Stichting (RSIN 861193660) that also has Equivalency Determination to a US Public Charity 501c(3). Loop is registered at The Hague Humanity Hub. Fluwelen Burgwal 58. 2511 CJ, the Hague. Any questions, concerns or breaches should be addressed to Alex Ross, the CEO and responsible person.

Any concerns not resolved can be reported to the Dutch Data Protection Authority (Dutch DPA) - Po Box 93374 the Hague, Holland.

Loop has done a legal assessment in Zambia as it felt necessary to do so due to some new laws there that were being pushed through the Government. These have since been overruled but at the time, we contracted a lawyer to do an assessment of our risks and exposure to these potential laws in Zambia.

➔ We will continue to keep an eye on new legislation at the national, regional and global level and conduct other specialised assessments when needed.

National laws may require Loop to reveal personal data upon a request of public authorities in certain circumstances. If this happens, Loop will inform the author, and we will only reveal data that they chose to share. This is articulated in the Privacy Policy.

How do we ensure compliance of our Data Processes?

Loop has a set of comprehensive Policies including:

- Safeguarding Policy
- Risk Management Policy
- Privacy Policy
- Disciplinary Policy
- Digital Management Policy
- Cookie Policy
- Complaints Grievances and Whistleblowing Policy and our
- Code of Conduct

This includes, and is reinforced by our Community Guidelines and Protocols. All Loop staff and partners staff who have been granted access to the Loop Moderation platform have received training on the Data Policy which focuses heavily on the importance of confidentiality. They have all also signed the Loop Codes of Conduct and have training in safeguarding on a regular basis. We track compliance to these commitments.

Our Case Managers monitor the posts of the country's with whom they partner on an ongoing basis and use this to make improved tags and to design trainings to address any potential risks. The policies are updated based on learning on a regular basis.

We have an independent consultant who manages the quality and consistency of the Loop sites (web and platform) and checks through posts on the open site to ensure compliance. They have signed the same Codes of Conduct as other Loop staff. Any issues arising from this monitoring can be dealt with directly but learning on patterns or complex decisions are taken to the monthly Moderators training to discuss, agree and then reflect in the Protocols.

Data Subject Rights

In line with data protection policies and legislation, people who have shared their personal data with Loop (data subjects) have a right of access to their Personal Data which we process about them. Anyone can write to Loop at alex@talktoloop.org to request access to or amendment of the Personal Data that we have registered concerning them.

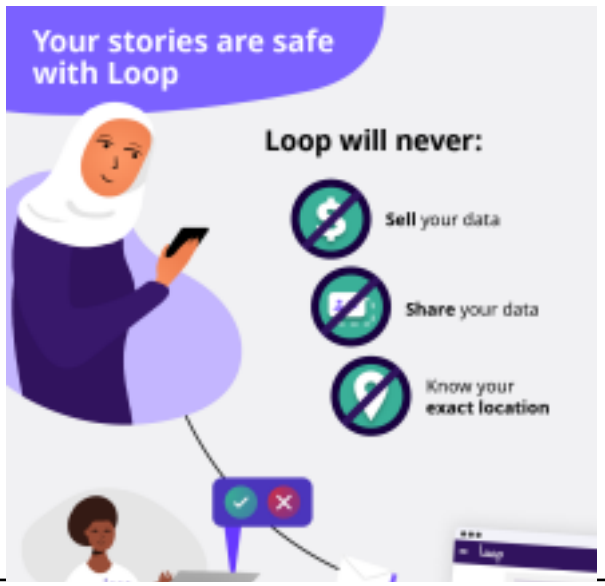
We also have a Safeguarding email address if needed. Or the Loop reporting platform can be used.

We will share people's Personal Data (only data concerning yourself, which you have given us yourself) in a structured, generally used and machine-readable format (data portability).

If people using Loop consent to share their data and they change their mind, they are entitled to revoke their consent at any time after proving their identity - the right to be forgotten.

Consent

'Informed consent' rather than just 'consent', is extremely important and as such the Loop Privacy Policy is available, translated and posters are printed and shared.



The Privacy Policy explains how data is managed at four different levels:

1) Pictorial for those less comfortable with the written word – translated

2) Short bullet points with topline

information about what we do or do not do with people's information – translated

3) A longer document in plain english explaining where what data is stored and

4) A longer, more official Iubenda generated Policy with detailed legal aspects. This will be customised when funding permits.

Because Loop is an independent organisation and does not provide operational services we have removed possible pressures linked to the type of feedback they might choose to give. People can give feedback when they like from where they like. This came across as a very positive aspect of the design. It means that people do not feel pressured to say certain things in front of certain people.

The communication of informed consent is in all of the languages on the platform. It is reinforced by how Loop is introduced to people and also within the flow of the feedback people are given the choice to feedback but not have it published online.

We follow the international best practice for children online and if a child decides to give feedback but is less than 14 years of age we will treat the story like a Sensitive Story even if it is not Sensitive. Our moderators consider the age of the author of the story when assessing relevant local risk factors.

> We will include in our monitoring and evaluation processes, which are ongoing but also taking place on a quarterly basis by an external evaluator, about how people felt about the consent process and if they understood it and to get advice on how to better communicate it.
>
> We will also review other sites and how they request consent online to improve our own.
>
> Loop will not share personal contact information with anyone except for what is on the open platform, without the author's consent. We will seek consent from authors to share their information with specific verified contacts only.

Part 5: Identify and Assess Risk

Source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	**Likelihood of harm** (Remote, possible or probable)	**Severity of harm** (Minimal, Significant or Severe)	**Overall risk** (Low, medium or high)
Appropriate Security measures We conducted some worst case scenario planning with the Data Protection auditors as well as various local populations. We stress tested our systems which were designed to mitigate these risks. The remaining, highest risks were: 1. **Authoritarian Governments or others trying to get access to Loop data** Our highest risk was authoritarian governments wanting to get access to the data, or other targeted attacks to get access to the data. This was not considered likely in the short term but increasingly likely with scale. For this reason we decided to host Loop on Amazon Web Services (AWS) in Frankfurt. This ensured it met GDPR requirements and was protected by private sector security measures with constant investment. We also implemented multiple layers of security: At technical level by choosing: o Distributed Denial of Service (DDoS) protection service o Security by the infrastructure - AWS is our Platform as a Service as they provide multiple layers of security and invest to guarantee security	Remote	Severe	High

○ All communication between application's components is encrypted ○ All infrastructure elements are now IaaC, managed via terraform code. At domain level by: ○ Strict limitation of data access levels within the architecture design - only dedicated team members for specific sensitive user data ○ Two step verification for new members and organisations ○ All environment parameters are now stored in the AWS Parameter Store ○ Every environment has a dedicated VPC and no shared infrastructure components. ○ Development environment is hidden behind VPN access only. ○ Production and Staging environments are protected by CloudFlare.			
2. Staff accidental breaches Our next highest risk was data breaches from staff and moderators. As a result we improved our policies, processes and conducted training and mandatory induction training on data protection, safeguarding for all country teams and will have updates on a 6 monthly basis.	Probable	Significant	Medium
3. Third party breaches The third highest residual risk was third parties access to Loop data and their management of this being out of our control. For example a	Probable	Significant	High

Mobile Network Operator in a given country reviewing the traffic on our site. All the data is open except for the sensitive stories. We suggest people input sensitive stories directly on our weblink to remove the number of third parties (WhatsApp, Facebook etc) but this is a choice by the author. We have vetted what third party actors we sign up with and have reviewed their policies. We try to remain working with those with the strongest policies (AWS) and have refused to work with some higher risk actors (Africa's Talking) This is a risk to all service providers. We have negotiated additional conditions with some third party actors.			

Part 6: Measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in part 5

Risk	Options to reduce or eliminate risk	Effect on risk (Eliminated / reduced / accepted)	Residual risk (Low / medium / high)	Measure approved (Yes/no)
Authoritarian Governments or others trying to get access to Loop data	Loop as an open feedback mechanism has less stigma than a Sexual Harrassment app and is marketed accordingly to reduce risks. We will be looking at implementing tunnelling so that if a phone or computer is	Reduced	Medium	Yes

	intercepted the history of the user having been on our site will not be evident It is acknowledged that no amount of investment can guarantee against this risk but we can continue to review and make it harder to penetrate our systems.			
Staff accidental breaches	We have moderator training on a monthly basis and weekly country specific meetings to go over any specific scenarios. The Loop Case Manager is the person overseeing the country partners' activities and approaches and brings in protection, GBV and SEAH management approaches to each of these meetings. This close oversight rather than pure case management involvement enables a stronger relationship, closer quality oversight and building a strong picture of national and emerging risks to manage. We also implemented an alert system where Sensitive Stories can be tagged as urgent and an SMS is sent to all Case Managers to attend to the case urgently without including any personal data in the alert. We have an independent quality controller (to increase time on controlling with scale and funds) who reviews the	Reduced	Medium	Yes

	platform and website and makes recommendations for immediate improvements to content as well as seeing patterns and raising issues in the moderation training.			
Third Party Breaches	As a result we have actively limited the number of third parties that we rely on. For example: we are currently in the process of reviewing a shift from Twilio to WhatsApp directly. We prioritise translation within AWS so as not to involve another party where benefits are minimal. Terms and Conditions and contracts for all third party services have been audited to confirm alignment with Loops data security requirements. As a result we have negotiated additional Terms and Conditions with some third parties including Mobile Network Operators and where this was not possible we have chosen not to partner with some actors. For example Africa's Talking did not have high sufficiently high enough levels of data security in their Policies. A full list of the actors that Loop works with can be found in the security analysis document	Reduced	Medium	Yes

	from the Creative Computing Institute.			

Item	Name/date	Notes
Measures approved by:	Alex Ross	
Residual risks approved by:		
DPO advice provided:	Marek Wrzosowski	DPO should advise on compliance with new initiatives.
Summary of DPO advice:		
DPO advice accepted or overruled by:	Accepted	If overruled, you must explain your reasons
Comments: Accepted		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	Alex Ross, Managing Director Alex@talktoloop.org	To be reviewed at whichever comes first: • September 2023 • if Loop enters a new country • if a need to review is identified