



COMMITTEE ON CONSTITUTIONAL AND LEGAL MATTERS

Hundred and Nineteenth Session

Rome, 9-11 October 2023

FAO Data Protection Policy – Update

I. Background

1. This document is presented to the Committee on Constitutional and Legal Matters (“CCLM” or “the Committee”), recalling that, in the Report of its 117th Session, endorsed by the Council at its 171st Session, the Committee “*looked forward to receiving an update at its autumn 2023 Session on the implementation of the Data Protection Policy, including on the outcome of the work with the World Bank Data Privacy Office*”.¹

II. Operationalization of the Data Protection Policy

A. Outcome of work by the World Bank Data Privacy Office: Alignment of FAO activities and instruments with the Data Protection Policy

2. The World Bank Data Privacy Office (“WB DPO”) was contracted to provide advisory services to help strengthen FAO’s data protection framework and support the review and the development of detailed operational guidance in key areas to support the implementation of the Data Protection Policy (“DP Policy”).

3. The work of the WB DPO included the review of existing arrangements and making recommendations for adjustments on various operational thematic frameworks and instruments where necessary, including templates, operational guidance, and workflows to align and implement the DP Policy. The outcome of the work is summarized as follows:

- a) Operational units are aligning their existing procedures and guidelines with the DP Policy based on the recommendations provided by the WB DPO.
- b) Corporate procedures, guidance and templates are being adjusted by the DPU to better reflect FAO’s standards and ecosystem. These will accommodate all FAO offices (decentralized and

¹ [CL 171/10](#), paragraph 11, and [CL 171/REP](#), paragraph 38.

Documents can be consulted at www.fao.org

HQ), divisions and centres in their implementation of the DP Policy once finalized and released internally in the fourth quarter of 2023.

- c) The Organization's data protection governance structure is strengthened for an effective implementation of the DP Policy.
- d) The Data Protection Unit (DPU), in collaboration with the Human Resources Division (CSH), is building a data protection e-Learning course based on the WB DPO material, that will serve training and capacity-building purposes for all personnel in the Organization. It will be made available in all six FAO official languages.

B. Institutional arrangements and oversight

4. The Oversight Advisory Committee received an update from the DPU in February 2023, and made recommendations with respect to the operationalization of the DP Policy.

Data Protection Unit

5. The DPU was instituted as an independent unit in the Office of the Director-General (ODG) on 1 January 2023. In alignment with its responsibilities, the DPU has been advising FAO offices (decentralized and HQ), divisions and centres on data protection obligations and measures to ensure compliance with the DP Policy.

6. The DPU's main activities in 2023 have included:

- a) Finalization of corporate procedures, guidance and templates to facilitate the implementation of the DP Policy based on the outputs produced by the World Bank Data Privacy Office ("WB DPO").
- b) Data protection outreach and capacity development activities.
- c) Roll out of data protection annual reporting.
- d) Establishment of a network of Data Protection Champions (DPCs) to help mainstream the DP Policy across the Organization.

7. The DPU also serves as a contact point for data providers, and manages requests and complaints from data providers through the FAO data privacy mailbox (FAO-Data-Privacy@fao.org) available on the FAO website. The DPU took action in response to requests received, addressing them in coordination with the relevant offices (decentralized and HQ), divisions and centres in a timely and efficient manner.

Data Protection Oversight Committee

8. The Data Protection Oversight Committee (DPOC) has been established and has met, addressing and advising on the initial stages of operationalization and implementation of the DP Policy.

9. It is chaired by the Chief Economist and comprised of the heads of the Digitalization and Informatics Division (CSI), Legal Office (LEG), Ethics Office (ETH), Logistic Services Division (CSL), Human Resources Division (CSH), Project Support Division (PSS), and senior representatives of two decentralized offices; currently from the FAO Regional Office for Africa (FAORAF) and the FAO Regional Office for Near East and North Africa (FAORNE), respectively.

C. Data Protection Annual Report

10. Reporting annually on the implementation of the DP Policy is a mandatory requirement for all FAO offices (decentralized and HQ), divisions and centres.

11. To minimize the burden on respondents and maximize the use of the Organization's resources, the online mechanism for the data protection annual report aligns with the Internal Control

Questionnaire (ICQ) process in terms of timing and reporting roles, with responses collected and analysed separately by the DPU.

12. The reporting tool will be rolled out in autumn 2023, with validation of the responses by December 2023, and the results reported to the DPOC and the Oversight Advisory Committee, as appropriate.

D. The Data Protection Champions Network

13. The Data Protection Champions (DPC) network is part of the implementation of the DP Policy. The DPCs will create awareness of the DP Policy and facilitate the development of a data protection culture in each FAO office, division and centre.

14. All FAO offices, divisions and centres have appointed a DPC, and the DPU has initiated DPC briefing sessions. The DPC network meets every 3 months to share challenges and best practices related to the implementation of the DP Policy.

III. Outreach and capacity development activities on the Data Protection Policy

15. The DPU has been focusing on three types of awareness-raising and capacity development activities: i) the creation of knowledge-sharing material related to the DP Policy; ii) outreach activities related to the DPC network; and iii) training/capacity-building related activities.

16. The DPU has conducted awareness-raising webinars. Recordings and materials related to these events are available to all FAO personnel on the FAO intranet.

17. The DPU has created a dedicated section for ‘Knowledge Sharing Material’ on the FAO intranet for all FAO personnel. Furthermore, DP Policy promotion activities take place through a comprehensive multi-channel approach (FAO corporate intranet, digital signage campaign, yammer, internal email distribution lists, teams channel).

Collaboration with other UN entities

18. To continue the promotion of the basic components and definitions of data protection across the Organization, the DPU, in coordination with the United Nations International Computing Centre (UNICC), is planning webinar sessions to raise general awareness and keep abreast of the latest developments, updates, and trends in data protection in the UN system.

19. Additionally, the DPU is conducting a series of internal webinars to foster inter-agency and expert collaboration on data protection matters with other UN system agencies, including the World Food Programme (WFP), the International Atomic Energy Agency (IAEA) and the United Nations Industrial Development Organization (UNIDO). The DPU is part of the UN informal data protection group which is a platform for sharing organizational experiences and aims for better alignment within the UN system.

IV. Suggested action by the Committee

20. The Committee is invited to take note of the progress made in the implementation of the FAO DP Policy and provide any comments thereon.