

## Embedding data ethics in your organization

Data-driven work can bring many good things. New insights, better service, more efficient operations and much more. However, data can also lead you astray. For example, by using the wrong data, or by using the right data in the wrong way. Ethical data use aims to make the most of the opportunities that are out there, without letting it blind you. This requires something of the organization, as well as its employees.

Risks with data are risks with people. Organizations using data need to be aware of this. Ethical data use starts with taking responsibility. This means doing everything you can to prevent any harmful consequences, in the short or long term, as much as possible. The considerations you make in this regard are aimed at making the best possible choice about whether to use data for a particular purpose. Or whether to share data with others. VKA and House of Performance, both members of the Highberg Group, help organizations to structurally embed ethical data use in their operations.

### What does ethical data use entail?

The guiding principle is to align the way you use data with the values you stand for as an organisation. On this foundation, you make conscious, explainable choices in what you do and don't do. Which values you use as a starting point is up to you. Considering the environment in which you operate, with its laws and regulations, but also its customers, employees, governments, interest groups and other stakeholders. As organisation, you must determine your stance here. What do you stand for, what goals do you want to achieve, what do you really think is important as an organisation?

Ethical data use ties in closely with the social development that increasingly values transparency. An example of this is the recent launch of a government-wide algorithm register. At the same time, transparency is increasingly becoming an obligation. For governments, there has long been a requirement that decisions must be adequately justified. But the new AI Act also sets high requirements for the transparency of algorithms identified as high risk.

### What does this imply for my organisation?

Organisational values apply to the organisation as a whole. So, both for policy formulation and implementation. And both for the use of both customer data and employee data. Should practice not match paper reality, then you can start the conversation based on the identified and established values. Implementing ethical data use therefore means including all work processes in the process. Then these processes can be developed separately. Two tracks can then be distinguished in this.

### Process adaptations

To give data ethics a structural place in the organisation, you will need to start organising it. Not only in the way you work, but also in the way you manage. For instance, by:

- Adapting development processes so that you can pay attention to the consequences of certain design choices at an early stage.
- Deploying a certain technique or working method, allowing bottlenecks or improvements to emerge earlier in the design process.
- Introducing new roles or shifting existing tasks and responsibilities to explicitly include data ethics.

The aim here is to embed the new way of working in the entire work process, at all levels in the organisation.

## Behavioural adaptations

Besides process adaptations, ethical data use requires behavioural change. Bringing employees into the new way of working is therefore essential. After all, otherwise, everything will stay the same. The main condition for this is that employees also *want* to be part of the change. Experience shows that four elements are preconditions for this:

**Believing:** employees must be convinced that ethical data use is actually important. For example, to deliver better services, or to mitigate risks.

**Understanding:** next, employees need to know what is expected of them in the new situation. What does the change mean for their job and the way they do their work?

**Enabling:** as an employee, do you feel confident that you can perform your new role? If you are expected to consult an ethics committee, how do you do that? And how do you involve external stakeholders in a project?

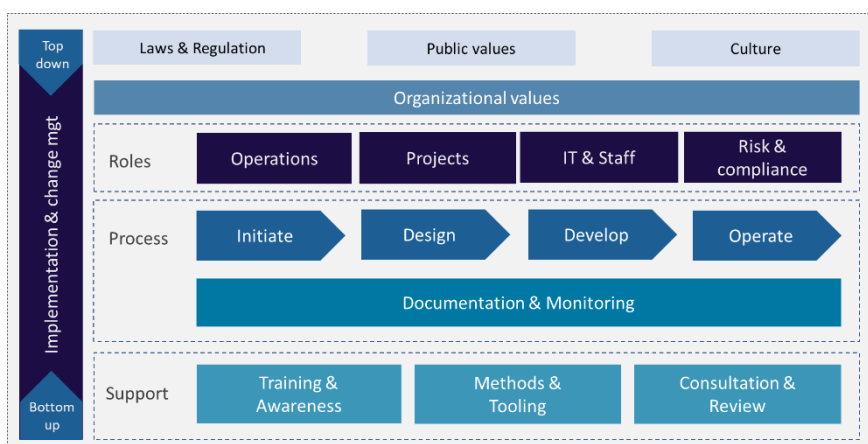
**Getting support:** fourth and final condition for wanting a change is knowing that you are not alone. That your colleagues and your manager are on the same track, with the same goal in mind. So that you can discuss not only practical questions, but also dilemmas beyond that. For example, whether certain risks are acceptable.



For each of these elements, we have a wide range of methodologies and working methods available. Examples include specific training courses, games and dilemma sessions, where skills needed for ethical data use are developed.

## An integrated approach

Both tracks influence and reinforce each other and are therefore best implemented in one project or programme. Which, incidentally, does not mean that everything must happen at once. A good possibility is to start with one part of the organisation and to roll out the new way of working step by step from there.



The presented figure shows which elements are involved in an integrated approach. Depending on the type of organisation, culture, and way of working, the most appropriate interpretation is selected for each block. For instance, by mapping core values, increasing awareness or setting up a tailor-made governance structure in which ethical expertise is also guaranteed. Or by the use of best practices, such as the Guidance Ethics

Approach of ECP, DEDA (Data Ethics Decision Aid) of the Utrecht University or the Algorithm Review of VKA.

A successful implementation of ethical data use looks different for every organisation. Would you like to exchange views on the possibilities for your organisation? Or would you like to know more about our data ethics services? Then feel free to contact one of the consultants below.

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