SITUATION REPORT - SPECIAL ON DIGITAL DATA
No. 691 - 19 December 2025

Europe External Programme with Africa is a Belgium-based Centre of Expertise with in-depth knowledge, publications, and networks, specialised in issues of peacebuilding, refugee protection, and resilience in the Horn of Africa. EEPA has published extensively on issues related to the movement and/or human trafficking of refugees in the Horn of Africa and on the Central Mediterranean Route. It cooperates with a wide network of universities, research organisations, civil society, and experts from Ethiopia, Eritrea, Kenya, Djibouti, Somalia, Sudan, South Sudan, Uganda, and across Africa. The Situation Reports can be found here. To receive the situation report in your e-mail, click here. You can unsubscribe at any moment through the link at the bottom of each e-mail.

Click here to download the report "Advancing Data Sovereignty for Sensitive Data and Patient Data in Africa" by the EEPA-VODAN Group

Pre-Holiday Update on EEPA's work on Data Sovereignty

- From 2025 to 2026: this report presents strategic considerations by the EEPA Situation Report on digital data as a means of informing public policy.
- The EEPA Situation Report provides regular updates on developments relevant to vulnerable populations in geographic areas from where little information is available.
- Sharing such information is necessary for fully informed public policy agenda setting.
- The EEPA Situation Report concludes the year with the observation that Data Sovereignty is a core element of national and continental security, and a strategic priority for African, European and global decision-makers.

Handling Sensitive Data in Health and Humanitarian Domains

- Control over health-, patient-, and humanitarian data is increasingly recognised as critical to national security, crisis preparedness, strategic autonomy, and resilience, rather than a purely technical or academic issue.
- These concerns are directly linked to risks of foreign dependency, data leakage, misuse of sensitive population data, and loss of decision-making authority in times of crisis.
- Too often, locally generated health and humanitarian data are processed, governed, or monetised outside national jurisdictions, creating vulnerabilities for national security, public health response, and policy independence, particularly during epidemics, conflicts, and humanitarian emergencies.
- Addressing this imbalance is essential to protect national interests, strengthen public institutions, and ensure secure, timely, and sovereign access to data for evidence-based decision-making, early warning, and emergency response.
- It is also a prerequisite for building public trust in digital health and humanitarian systems.
- Together, these policy trajectories point towards the strategic importance of a trusted, federated Africa Health Data Space.
- The purpose is to ensure that health and humanitarian data remain under national and institutional control, while enabling secure, rule-based, and purpose-limited cross-border use in support of continental health security and cooperation.

Data Sovereignty at the Centre of Data Collection

- Through a coherent set of digital regulations, the EU and Africa are establishing the legal and technical foundations for trusted, federated data sharing, ensuring that sensitive data can be used for public value without undermining national or institutional control.
- Across Africa and Europe, governments and public institutions are expressing growing concern about who controls sensitive data, where these data are stored, and under which legal and security frameworks they are accessed and reused.

- Continental-wide, the African Union and the European Union have positioned digital sovereignty and data autonomy at the core of the regulatory and security agenda.
- Based on the Malibu Convention (2014), the AU Digital Transformation Strategy (2020–2030), the African Union Data Policy Framework, and Africa CDC's data governance and public health surveillance strategies emphasise data ownership, localisation where appropriate, trusted sharing, and continental interoperability.
- The EU Governance Data Act (Regulation (EU) 2023/2854) is a landmark EU law creating a fairer, more innovative data economy by giving users (consumers & businesses) control over data from connected devices, fostering data sharing, ensuring fair cloud switching, and allowing public bodies to request data in emergencies, balancing innovation with rights for a competitive data market.
- The EU Governance Data Act main aims are to safely enable the sharing of sensitive data held by public bodies, to regulate data sharing by private actors.
- Together with complementary legislation such as the Digital Services Act (DSA) (2022/2065) and Digital Markets Act (DMA) (2022/1925) these measures strengthen Europe's capacity to protect critical data infrastructures, manage systemic digital risks, and assert strategic autonomy in the digital domain.

Strategic Data Autonomy as Security Pillar

- These regulations explicitly aim to reduce strategic dependency on external actors and to ensure that data generated within a jurisdiction can be governed in line with public interest, security, and accountability requirements.
- The European Health Data Space (EHDS) further operationalises these principles for one of the most sensitive data domains.
- It establishes a framework for the secondary use of health data under strict governance, security, and purpose limitation rules, while preserving national competence over health systems.
- EHDS reflects a federated model in which data remain at source, access is controlled, and sovereignty is embedded by design-an approach.
- The EHDS is directly relevant to African health and humanitarian data governance.

Data has Value

- VODAN, the Value-driven and Ownership of Data and Accessibility Network, established in 2020 by the Africa University Network on FAIR Open Science (AUN-FOS), offers an operational response to these security and sovereignty requirements.
- VODAN translates policy principles into implementable data governance and infrastructure models.
- By applying the FAIR Data Principles, VODAN enables data to stay with African data holders, while supporting secure, governed, interoperable, and auditable access for health and humanitarian use, in line with national legislation, AU frameworks, and Africa CDC priorities.
- Highlighted in the book "FAIR Data – FAIR Africa – FAIR World", it aligns with data space architectures.
- Europe External Programme with Africa (EEPA) and universities including Tangaza University, strengthen institutional capacity at national and continental levels on data sovereignty with VODAN expertise.
- Together, these efforts demonstrate how Health and Humanitarian Data Spaces can be built to safeguard national security interests, advance continental digital sovereignty strategies, reduce external dependency, and connect securely and interoperably to African, European and global data ecosystems.

EEPA Situation Report pledges to focus on data sovereignty in 2026. EEPA Situation Report thanks everyone collaborating and its readers and sends best wishes for the festive season.

Links of interest

EEPA-VODAN Report: Advancing Data Sovereignty for Sensitive Data and Patient Data in Africa
https://raee.eu/fair-data-fair-africa-fair-world-internationalisation-of-the-health-data-space/
Africa University Network on FAIR Open Science
Africa Health Data Space
AHDS FAIR Senior Datastewardship Training 2025
Value-driven and Ownership of Data and Accessibility Network