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Contribution by CSTD Gender Advisory Board

to the CSTD 2026-2027 priority theme on
"Data Governance for Development: From Asymmetry to Equitable Stewardship"

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Consolidated comments on the draft CSTD issues paper on
Data Governance for Development: From Asymmetry to Equitable Stewardship

From the CSTD Gender Advisory Board

Overall assessment and central recommendation

The paper provides a strong analysis of asymmetries between countries and useful national examples. Its main analytical gap is that it does not apply the same value-chain logic consistently within countries. Gender appears chiefly as a connectivity statistic at the generation and collection stage, then largely disappears from the analysis of storage, processing capacity, use and value capture, governance capacity, stewardship, cross-border flows, benefit-sharing and interoperability. This is not simply a question of adding references to gender. It is an opportunity to extend the paper's own structural analysis: participation at one stage of the data value chain does not confer authority or benefit at later stages, either between or within countries.

The central substantive recommendation is to recognise representativeness as a condition of data quality and scientific validity. Accuracy, timeliness and fitness for purpose are insufficient if the population affected by a dataset or system is not adequately covered. Population coverage and known gaps should therefore be documented alongside provenance. This would also provide the foundation for the paper's later discussion of bias and unrepresentative training data.

Conceptual clarification on data management and data governance

Terminology. The paper should distinguish more clearly between data management and data governance. Data management comprises the technical and operational activities involved in collecting, cleansing, curating, storing, retrieving and using data - the activities the paper describes as the data value chain. Data governance concerns the policies, procedures, societal, organisational and national values, decision rights and structural mechanisms that guide those activities and enable the data value chain to create societal and economic value.

Recommended revision to Figure 1. Present data governance either as the foundation beneath the data value chain or as an enclosing framework that guides every activity across the chain.

Representational and procedural symmetry. The distinction also clarifies the relationship between two of the four symmetries identified in the Gender Advisory Board's position paper. Representational symmetry concerns the data-management layer: whether the populations affected by a system are adequately represented in the data used to build, evaluate and operate it. Procedural symmetry concerns the governance layer: whether women and other affected populations possess both voice and decision-making power in defining the principles, categories and policies that govern data management, including quality assurance, measurement and oversight. Representation in data does not substitute for authority in governance; both dimensions should therefore be made explicit.

Chapter 2 Principles generation and collection and governance capacity

- Expand the treatment of gender beyond access and connectivity. The availability of sex-disaggregated internet-use data should not be treated as a complete measure of gender in data governance. The absence of sex-disaggregated indicators for the intensity of digital participation, data processing, governance and value capture is itself a governance asymmetry.

Proposed text: Measurement of these asymmetries is itself uneven. Sex-disaggregated data are available for internet use but not for the intensity of digital participation, data processing capacity or value capture. As a result, existing indicators can describe who is connected but not who generates, governs or benefits from data within countries. Addressing this measurement gap is a prerequisite for evidence-based policy on inequalities embedded in the data life cycle.

- Define data quality to include representativeness. Stewardship frameworks should document the population covered by a dataset and any known gaps, in addition to accuracy, timeliness, fitness for purpose, provenance, metadata and preservation.

- Address compute asymmetries with corresponding policy measures. Options include encouraging major cloud service providers to offer discounted compute to developing countries; supporting shared public compute pools and data and research infrastructure; and converting developing countries' data contributions into compute credits or technology transfer.

- Strengthen the institutional design of inclusive participation. Governance capacity should include the composition and decision-making structure of national data authorities, statistical offices and standards bodies - not only their institutional, legal and coordination capacities. National data strategies could provide for gender-balanced advisory bodies, including consideration of a minimum threshold such as 40 per cent women, with appropriate representation of affected and underrepresented groups.

- Address the market and environmental dimensions of data and compute concentration, which are presently underdeveloped, and connect the diagnosis of market concentration to concrete recommendations.

- Develop guidance for assessing gender bias in AI training data and algorithmic systems, including measurable gender-balance and representativeness targets appropriate to developing-country contexts.

Chapter 3 Use value capture participation and benefit sharing

The paper's analysis of value capture should extend to distribution within countries. Women generate substantial volumes of data through health and reproductive tracking, paid and unpaid care, agricultural activity, mobile money and informal commerce, while often holding little authority over how those data are classified, accessed and used or how the resulting value is distributed. This is the same separation between data generation and value capture that the paper identifies between developing and developed countries.

- Connect the analytical chapter to the Kenya and Peru examples, including the question of who captures value from data generated through women's paid and unpaid labour.

- Reframe the Peru example. Reporting women as "more than a quarter" of participants should be treated as a finding to be assessed against women's share of the agricultural labour force, rather than automatically as an achievement. The example illustrates the distinction between numerical participation and decision-making position.

- Recognise that communities are internally differentiated. Community-level consent and benefit-sharing arrangements can leave intra-community gender asymmetries untouched. Safeguards for community-held and Indigenous data should therefore assess whose interests, authority and benefits are represented within the collective.

Chapter 4 Stewardship and interoperability

- In the discussion of the CARE Principles and collective authority to control data, explicitly identify gender and women's rights organisations among the groups to which the broader principle may be adapted.

- In the discussion of FAIR and data quality, treat representativeness as a quality attribute rather than an optional equity supplement. A dataset may be findable, accessible, interoperable and reusable while remaining systematically unrepresentative; reusability may then propagate the deficiency. Population coverage and known gaps should form part of quality assurance.

- In the semantic interoperability section, name gender explicitly among the examples of how standards determine which knowledge and perspectives become visible. Whether data are

collected at household or individual level, and how unpaid care, informal employment and household headship are classified, have measurable distributional consequences.

- In the discussion of agentic AI, explain that representational deficits may compound across the data-to-model-to-output chain as outputs become new training inputs. This supplies a concrete rationale for provenance and traceability requirements across successive generations of systems.

Chapter 5 Cross border flows and international cooperation

- Require cross-border transfer mechanisms to preserve provenance, demographic coverage and disaggregation metadata. When flows strip this information, they make asymmetries invisible at the point where disaggregated evidence is needed to identify them.

- Include sex-disaggregation and representativeness requirements in the international recommendations on capacity-building and benefit-sharing. These revisions can be anchored in General Assembly resolution 80/173, including its commitments concerning women's full, equal, safe and meaningful participation, women's economic agency, gender equality as a core theme, closing data gaps and strengthening indicators.

- Explain how the paper and its recommendations align with the Working Group on Data Governance and the WSIS+20 process, preferably in a dedicated concluding passage.

Recommended revisions to the conclusions

Proposed text: Governments should establish mechanisms that enable women, Indigenous Peoples, local communities and persons in vulnerable situations to hold decision-making roles in data governance institutions and standard-setting bodies, rather than participating only in consultations. Indicators of inclusive governance should measure position and decision-making authority, not headcount alone.

The international recommendations should also call for:

- documented population coverage and known gaps as part of data-quality and provenance requirements;
- sex-disaggregated indicators across the data value chain;
- gender-responsive AI training-data bias assessments and performance monitoring;
- practical measures to reduce compute and infrastructure asymmetries; and
- gender-responsive participation and decision-making in national and international data-governance and standard-setting bodies.

Suggested revision to annex question 2

Proposed text: How are inequalities embedded in the processes through which data are generated, collected and used, including along lines of gender, geography and income, and what does the absence of disaggregated indicators across the data value chain mean for policymaking, public-service delivery and development outcomes?

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