



**UNITED
NATIONS
UGANDA**



PSEA STAKEHOLDER NETWORK UGANDA SEA INFORMATION SHARING PROTOCOL
(ISC)

DRAFT

1. Introduction

Sexual Exploitation¹ and Abuse² committed by humanitarian or development workers is a serious breach of UN and partners' code of conduct and is likely to be a crime under Ugandan law. It is also a multi-faceted issue that requires a coordinated response.

2. Purpose

This information sharing protocol applies to UN agencies and partners with the objective to guide and describe procedures for sharing anonymous SEA data and information. This protocol is meant to facilitate the information sharing between members of the PSEA Stakeholder Network (at national and local levels) and its partners (whilst ensuring dignity and safety of SEA victim/survivor is observed) and when other types of requests are received on SEA data; it is not to be used to manage cases.

3. Through this protocol UN agencies and partners recognize that sharing and receiving non-identifiable data on suspected and/or reported cases of SEA will contribute towards improved inter-agency coordination, identifying and targeting gaps, prioritization of actions, and improved programming of prevention and response efforts. It may also result in improved advocacy efforts, increased leverage for fund raising and resource mobilization, and improved monitoring. All agencies will protect information and ensure that data is shared on a need to know basis so that the victim, alleged perpetrator and the affiliated organization are not exposed to further harm.

4. Rules for sharing of data

In line with the Uganda SOPs for Receiving, Recording and processing SEA complaints, all agencies should notify the UN Resident Coordinator in real time on SEA cases received.

- The SEA data to be shared should include age, sex and district where the incident took place. The data will be shared in an excel document that is password protected with password only privy to the PSEA Coordinator and the RC.
- UN agencies will notify the RC on allegations involving their staff, volunteers, UNVs, contractors and Implementing Partners. All other allegations involving NGO and CSO humanitarian and development workers will be reported to the RC directly by these organizations. The allegations will be consolidated and reviewed to avoid double counting.

¹ is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

² is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

- All signatories agree that the SEA data will not be used for following up on individual cases of an organization. This is the responsibility of the alleged organization.
- All agencies will protect information to ensure that no harm is caused to any victim, whistleblower, service provider, subject of complaint or the community from information sharing efforts.
- Each PSEA Network Member reserves the right to share its own data externally, for example for internal and donor reporting requirements, resource mobilization, and advocacy. Even when using its own data externally, each PSEA Network member is expected to do this in a responsible manner that maintains the safety and security of SEA victim, service providers and their communities. Each data gathering PSEA Network organization may suspend the sharing of information for reasons of safety, security, capacity or other considerations through written justification to other ISP signatories.
- For security purposes and to ensure victim confidentiality, no victim-specific information that can lead to identification of the victim will be shared, e.g., name, initials, address, phone number, etc. All information shared will be anonymous statistical data.
- Following signature of the protocol, PSEA Stakeholder Network Members and their PSEA Focal Point(s) have a responsibility to train their colleagues about the standards and procedures outlined in this information sharing protocol. Notably, that the data is shared on a monthly basis among the signatories of this protocol in a manner outlined in this document; any requests from external actors for access to consolidated SEA information must be directed to the United Nations Resident Coordinator in order to begin the authorization process among the PSEA Network Members; SEA data is not to be used for follow up or investigation on individual cases/survivors. They should also explain to their colleagues that any question or request for SEA information should be directed to their respective organizations Head of Agency / Country Director.

5. Data Security

The UN Resident Coordinator through the UN PSEA Coordinator and all members of the PSEA Stakeholder Network will ensure that all data is safe and secure and will implement appropriate procedures to maintain confidentiality of the data. UN Implementing Partners through the respective UN agencies shall submit an Excel document (that is password³ protected) to the PSEA Coordinator who shall consolidate and share with RC.

6. Monthly Reports

1. Frequency: Signatories to this information sharing protocol will on a monthly basis share the status of the provision of victim assistance and the status of the internal investigation with the PSEA Coordinator.

³ Password to be revealed only to the PSEA Coordinator

2. The UN PSEA Coordinator will consolidate all submitted information and create an aggregate monthly report and share with UN Head of Agencies.
3. The PSEA Stakeholder Network will discuss trends and patterns in reporting in the monthly Stakeholder Network meetings. The trends analysis will enable discussion on advocacy and improvement of prevention and response mechanisms.

7. When other parties requests information on SEA

1. Internal and Donor Reporting

The UN Resident Coordinator's Office and members of the PSEA Network are authorized to use their own individual statistics on reported SEA incidents for their internal and donor reporting requirements.

When sharing data for their internal reporting requirements, organizations and agencies should maintain data protection standards of confidentiality and security. In that purpose they should send the following caveat along with the SEA statistics:

The data shared is only from reported cases, and is in no way representative of the total incidence or prevalence of Sexual Exploitation and Abuse in Uganda. These statistical trends are generated exclusively by members of the PSEA Network who deliver development and humanitarian support across Uganda. This data should not be used for direct follow-up with survivors or organizations for additional case follow-up. The following information should not be shared outside your organization/agency. Failure to comply with the above will result in the suspension of sharing SEA statistics in the future.

The media is not included as a pre-approved point for information and data sharing as context and security situations can change rapidly. Media requests should be handled on a case by case basis and in a transparent manner.

Sharing data to Non PSEA Stakeholder Network Members

Each time external agencies or actors that are not signatories of this ISP submit a request for any other consolidated SEA data, the UN PSEA Coordinator in consultation with RC, will issue a written request to each of the data gathering organizations for authorization to share aggregate consolidated data. Each request for authorization to share consolidated SEA data will specify:

- The reason/purpose for the request for information;
- What the information will be used for;
- How the information will be used;
- How the information produced with the consolidated data and analysis will be fed back to the data gathering organizations, and
- A written guarantee by the receiving party to not disseminate the report to any other party or utilize it for any purpose beyond that which was requested and authorized.

The consolidated data will be shared only after receiving authorization from Resident Coordinator.

If PSEA Network Members (other than the UN Resident Coordinator's Office) receive requests from external agencies or actors not already approved for data sharing by the PSEA Network Members, they should inform and send this request to the UN PSEA Coordinator so that the appropriate action is taken.

When a request for authorization to share data is submitted by the UN PSEA Coordinator:

1. The request will be sent by the UN PSEA Coordinator to both the primary and secondary PSEA focal points of each organization with copy of the Head of Agency of the concerned organization.
2. The UN PSEA Coordinator will call the PSEA focal points of each organization to inform them about the request received and ask them to provide their written feedback to the request within 5 business days. The UN PSEA Coordinator will also follow up with the organizations' focal points by telephone.
3. If no response is received from the organizations' focal points, the UN PSEA Coordinator will follow up with the senior management of the non-responsive organization(s). If no response is received from the senior management after 5 business day, it does not imply automatic authorization to share the data externally.
4. If after following the above steps, the organization(s) has/have still failed to provide feedback, UN PSEA Coordinator will contact those organizations who have already provided their authorization, and ask them whether they agree to share the aggregated data excluding the data collected by one (or more) signatories that is/are not responding to the request.
5. If all organizations still agree to data sharing, then data will be shared excluding the data collected/compiled by the non-responsive organization(s).

The UN PSEA Coordinator will remove all data gathering organizations' identifying information.

A party that has been authorized to receive consolidated SEA data must agree to not disseminate the information to any other sources in the written request they submit to the UN PSEA Coordinator. The party has to direct any requests they receive for access to this shared data to the UN PSEA Coordinator.

When written authorization for external data sharing is attained from Resident Coordinator, the UN PSEA Coordinator will share the data along with the following relevant caveats in writing:

1. The data is only from *reported cases*. The consolidated data is in no way representative of the total incidence or prevalence of SEA in any one location or group of locations. Sufficient explanation of limitations on reported cases and trends in reporting should be properly highlighted in any external communication after permission is received from contributing agencies. This information is confidential and cannot be reproduced without the authorization of the PSEA Stakeholder Network Members.
2. The aggregate data is based on non-identifiable data submitted from PSEA Stakeholder Network Members for the purposes of:
 - SEA prevention and response program planning, monitoring and evaluation by the UN Resident Coordinators Office and partners
 - Identification of programming and service delivery gaps
 - Prioritization of actions and next steps
 - Improved service delivery
 - Policy and advocacy
 - Resource mobilization
3. The data shared should be accompanied by the following caveat:

The data shared is only from reported cases and is in no way representative of the total incidence or prevalence of Sexual Exploitation and Abuse in Uganda. These statistical trends are generated exclusively by members of the PSEA Stakeholder Network who deliver development and humanitarian support across Uganda. This data should not be used for direct follow-up with survivors or organizations for additional case follow-up. The following information should not be shared outside your organization/agency. Failure to comply with the above will result in the suspension of sharing SEA statistics in the future.

Media and External Advocacy Institutions

Any request for SEA consolidated information needs to be made in writing including information on how the data will be used to the UN Resident Coordinator's Office **who can then share only number of SEA cases (without revealing names or sex or age or other personal information of victims)** after receiving authorization from all data gathering organizations as outlined above.

By this information sharing protocol, the PSEA Network Members understand that they can refer any request for SEA consolidated information to the UN Resident Coordinator's Office who can then share the data after receiving authorization from all data gathering organizations in response to the written request. Any denial of authorization should be

accompanied with an explanation that can be shared in a non-identifiable format with the requesting party at the UN Resident Coordinator's discretion.

8. Time Limit

This information sharing protocol will take effect from time of approval and will be reviewed annually.

9. Breaches

In cases of breach by any of those participating in this information sharing protocol, a meeting will be convened including all PSEA Stakeholder Network Members focal points within one week to discuss the matter and to determine appropriate action to be taken. If a meeting cannot be convened within one week or a resolution cannot be reached, then the following process should be undertaken:

- A meeting will be convened including Heads of Agencies from all PSEA Network Members to discuss the matter and to determine appropriate action to be taken within one (1) week.
- If unresolved, the matter should be referred to the UN Resident Coordinator within two (2) weeks of the breach or suspected breach.

This resolution process should not impact regular information sharing if the breach is resolved.

Data gathering organizations reserve the right to stop sharing data if the information sharing protocol is breached and will inform UN PSEA Coordinator in writing with the reasons for stopping the flow of data. While the matter is being resolved, and if the UN Resident Coordinator's Office is not involved, it is recommended that data gathering organizations continue to share data with UN PSEA Coordinator to inform field level activities (i.e. programming and service delivery gaps). The SEA consolidated information will not be shared externally until the breach is resolved.

The resolution of a breach or suspected breach must be agreed to by all organizations who are signatories to this protocol. If the resolution cannot be agreed upon, signatories have the option to terminate, in writing⁴, their inclusion in the protocol and the protocol will be revised accordingly.

⁴ The individual who signed the information sharing protocol would communicate the organization's withdrawal.