

1. Framework for access of Personal Data of Persons of Concern

- a) UNHCR and OPM signed a memorandum of understanding in August 2019 on Registration and Data management in Uganda adopting proGres v4 for registration system and main data repository. The MOU allows UNHCR to share personal data of persons of concern (POCs) with partners for delivery of protection and assistance based on UNHCR's Data Protection Policy (DPP).
- b) To access personal data of PoC:-
 - i) UNHCR Implementing partners will be required to sign Annex F to the Project Partnership agreement (PPA) which will be drafted jointly by UNHCR and the Partner. Annex F expands and complements on Article 12 in Appendix 2 of the PPA outlining the purpose of information sharing, data elements to be shared and processed, legitimate basis for collection and sharing of information, sharing of information with 3rd parties, rights of data subjects, handling data breach and modalities of data sharing, including the use of proGres v4.
 - ii) Operational partners will be required to sign a Data Sharing Agreement, drawn along the same lines as b (i) above, with UNHCR for the sharing and processing of personal data, including the use of proGres v4.

2. Requirements for accessing proGres version 4

The partner will:-

- a) Undertake a Data Protection Assessment jointly with UNHCR to ensure that partner and implements the same or comparable standards and principles as contained in the Data Protection Policy.
- b) Provide data collected on behalf of UNHCR, based on informed consent, for migration into proGres v4 following a joint analysis of the data.
- c) Ensure all partner staff who will be using proGres v4 will attend training that will be conducted by UNHCR.
- d) Ensure availability of reliable internet connectivity and hardware for use of proGres v4. Implementing partners may be assisted with additional laptops following a joint assessment of the existing equipment.
- e) Ensure that partner proGres v4 user lists remains up-to-date and that UNHCR is informed in advance of separation or change of role of a user, from the organization, in order to revoke access. Where advance notice is not possible, the partner shall inform UNHCR at the earliest opportunity or no later than the same day of separation of the user. Unauthorized access and processing of personal data of PoC in proGres v4 is considered as personal data breach.

3. Modalities for accessing personal data of POCs in proGres v4

- a) Partner will be accorded with partner profile access to proGres v4, according to which individual registration record is to be shared and made accessible for Partner by UNHCR on the need to know basis, subsequent to search and request by a Partner user. Appropriate rights for case creation and referral shall be accorded to Partner users based on the purpose of processing, functional areas of the users and on the need to know basis.
- b) Access to registration records will be granted by UNHCR Protection focal points within 24 hours after a request has been received. Access can also be revoked when no longer needed.
- c) For protection or assistance programs targeting a large number of beneficiaries, UNHCR will share data elements required with the partner based on the scope and requirements of the intervention.

4. proGres v4 User profiles

- a) Partners may have access to the following modules:-
 - i) Registration module – read-only access to shared records
 - ii) SGBV and / or Child Protection module – access rights are outlined below
 - iii) Assistance module – read, write and update access
- b) Partners can request access to staff according to the following user profiles:-
 - i) Caseworker – can create Child Protection / SGBV cases and submit them for review
 - ii) Case Manager – reviews cases by caseworkers under their supervision
 - iii) Supervisor – read-only access for all cases by partner users in the organization
- c) Selected UNHCR users will be able to:-
 - i) Grant access to registration records
 - ii) See the number of CP/SGBV cases handled by the partner without access to the information on the cases.
 - iii) Information relating to CP/SGBV case management will be shared by Partner with relevant UNHCR users on a need to know basis and based on the consent of the PoCs