

SEAH HARMONISED REPORTING SCHEME FREQUENTLY ASKED QUESTIONS

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What is the SEAH harmonised reporting Scheme?

The SEAH harmonised reporting Scheme is an initiative led by the CHS Alliance and the Steering Committee for Humanitarian Action (SCHR), funded by the Foreign Commonwealth Development Office, aiming to support NGOs and private sector organisations to collect and report SEAH incidents in a uniform way in a harmonised <u>SEAH data collection and reporting framework</u>, currently being piloted.

This system will support trends analyses and effective learning from aggregated data, which will inform policies and strategies aimed at improving victims/survivor's outcomes and prevention interventions.

The Scheme aims to introduce a harmonised framework for SEAH data collection and reporting based on existing best practice, with the following mid- and longterm objectives:

- Increase transparency and accountability on SEAH
- Reduce under-reporting of SEAH by facilitating reporting by NGOs and the private sector, through a single and simple system
- Support trend analysis and effective learning from aggregated data to inform policies and strategies aimed at improving victim/survivor outcomes and prevention

You can learn more about the project on our webpage, or in our *information brief* and *public presentation*.

Why do we need harmonisation on SEAH reporting?

Organisations today capture widely varied and incomparable SEAH data, often due to the multiple and distinct requirements they have from various stakeholders, and due to the absence of global consensus and guidelines on which data should be collected and reported.

Although the data collected is similar, the data fields or categories in each data fields are often different, which makes joint data analysis impossible. This results in little data or trends being available on SEAH, giving the aid community a limited knowledge and understanding of the problem beyond each organisation's experience, hindering learning.

A harmonised reporting framework will allow us to have global trends on SEAH to better understand the intricacies of the problem, and therefore improve policies and strategies for risk mitigation, prevention, and response based on evidence from the field.

What is the added value of joining the Scheme?

- Members will benefit from streamlined SEAH reporting, with the objective on the long-term to report SEAH in the same way to all main donors, reducing the reporting burden for organisations.
- Members will have access to bi-annual trends and analytical reports to better prevent SEAH and mitigate risks as well as improve their response (e.g. develop an organisational strategy, design a PSEAH action plan, prepare a project

proposal, advocate for allocation of funds to safeguarding, inform programmatic risk mitigation measures, etc).

- Members will also have exclusive access to aggregated data visuals on the Scheme platform, which they will be able to filter and tailor to their needs.
- Members can exchange on challenges and lessons learned on SEAH with their peers and have access to learning events on using the SEAH evidence to improve organisational strategies and programs.
- Being part of the Scheme is a marker of, and commitment to, accountability and transparency.

How was the Scheme designed and who was consulted?

Consultations were undertaken in 2021-22 with around 60 diverse organisations (INGOs, NNGOs, private sector organisations, etc), with the objective of mapping the data currently being collected and reported by organisations, and consulting stakeholders on their perspective and suggestions on the creation of harmonised framework for SEAH reporting. The report from the consultations can be found here.

Results informed the design of a draft framework, which was submitted to the project's Steering Committee for review and adoption. The framework was piloted over a year (from October 2022 to September 2023) with a group of INGOs, NNGOs and private sector organisations, and adjusted based on their feedback before scale up. The report from the pilot can be found <u>here</u>.

Who can sign up to the SEAH harmonised reporting Scheme?

The Scheme is open to all types of organisations – international non-governmental organisations, national or local non-governmental organisations, private sector organisations as well as donors. Participation in the Scheme is voluntary and free for any organisation. All types of organisations can join the Scheme, regardless of their size at any time during the pilot – we have a mix of organisations, with the smallest having less than 10 employees and the bigger ones having tens of thousands of employees.

What are the pre-requisites to join the Scheme?

There are no specific pre-requisites to join the Scheme, but you should ensure that your organisation can meet the Scheme's requirements in practice:

- Internal agreement to adopt the proposed SEAH harmonised framework and to use it to collect data on SEAH incidents;
- Appointing within your organisation a specific focal point to collect and report SEAH incidents twice a year into the Scheme's platform
- Having processes in place allowing your organisation to safely collect and share information about SEAH incidents

How can I join the Scheme?

- **Step 1** <u>Contact us</u> to expresses your interest by contacting Mathilde (<u>mbelli@chsalliance.org</u>) and Coline (<u>crapneau@chsalliance.org</u>). We can provide you or your management with an information session on the Scheme to confirm your interest in joining.
- **Step 2** We will provide you with a data sharing agreement to be signed by the head of your organisation & the CHS Alliance, outlining the reporting process and data protection obligations.
- Step 3 Your organisation will receive an induction and log in credentials to the platform. You will start reporting from the end of the ongoing reporting period and continue to do so every 6 months. If you do not collect all the data required by the Scheme, you can report available data only, and select "do not routinely collect this information" for data which is not yet collected.

Is there a membership/subscription fee to join the Scheme?

There is currently no subscription fee or other cost to sign up to the SEAH harmonised reporting Scheme.

License costs to access the platform are covered by the CHS Alliance. This is included in the data sharing agreement signed between the two organisations.

If I join, do I have the right to withdraw at any time?

The participation in the SEAH harmonised reporting Scheme is voluntary and your organisation has the right to withdraw at any time. This is included in the data sharing agreement.

To withdraw from the Scheme, the head of your organisation must contact Mathilde Belli (<u>mbelli@chsalliance.org</u>) confirming their decision to withdraw.

What data should I report and how often?

You should report data on the agreed-upon <u>data fields</u> on the online platform every 6 months.

If you do not wish or cannot report on some of the data fields, you always have the option to select the following options: "do not wish to disclose this information", "do not routinely collect this information", "risk of identification", or "unknown for another reason".

How does reporting work in practice?

Once the data sharing agreement has been signed, your organisation's reporting focal points will be provided with credentials to log-in to the reporting platform. In your organisational space on the platform, you will have the option to input new incidents, using a user-friendly data entry system. You always have the option to edit incidents once they have been inputed.

Incidents should be reported every 6 months (in April, covering the period from October 1st to March 31st; and in October, covering the period from April 1st to September 30th).

On the platform, you will have access to your database of incidents, seeing only the ones that you have reported, but not the ones reported by other organisations. Once you input a new incident, it is automatically aggregated with all incidents in the master database, managed by the CHS Alliance. On the master database, incidents are not linked to an organisation, and as such become fully anonymised.

Who from my organisation should report?

The person in charge of reporting should be the person already or specifically appointed within an organisation to manage or oversee SEAH incidents. The specific title or role of this person may vary from organisation to organisation (Safeguarding Advisor, PSEAH coordinator, Ethics Officer, PSEAH focal point, etc).

Organisations are free to choose who within their organisation will be responsible for this task. It is recommended that you identify an alternate to ensure continuity in case of leave.

All reporting focal points will receive a training on how to use the platform and input incidents.

If I work with partners, should I report their cases?

Each organisation should report the cases internal to their organisations only, to prevent double reporting. Each organisation should encourage the partner their work with to join the Scheme so that they can report SEAH incidents directly. If the partner organisation does not have the capacity to join the Scheme, the Member organisation may report on their behalf.

Should I report cases reported to me on another organisation?

No. You should report cases internal to your organisations, or to your partners if they are not part of the Scheme. This allows us to prevent double reporting of incidents. If you receive a case about another organisation, you are nonetheless responsible for systematically referring this case to the concerned organisation.

Are the incidents reported onto the platform public?

No. The SEAH data collected through the SEAH harmonised framework is never reported in their disaggregated state. As such, it is different from the UN iReport. The Scheme platform is not public. It is only accessible to members. Only trends report, which only include aggregated and anonymised data, are made public. You can see an example of a trends report <u>here</u>. Careful consideration is given to ensure there is absolutely no risk of identification for the organisation, the victim/survivor, or the alleged perpetrator in the public reports.

Once you input a new incident onto the platform in your organisation space (accessible to your organisation only), it is automatically aggregated with all incidents in the master database, managed by the CHS Alliance.

Even in their aggregated state, incidents are not made public. On the master database, incidents are not linked to an organisation, and as such become fully anonymised.

What if my organisation already has a different system in place?

Even if your organisation already has a system in place, you can still join the SEAH harmonised reporting Scheme. Often the data collected in the Scheme is already covered in other organisations' systems, so reporting information on your incidents onto the platform should be very straightforward.

In case of differences between the systems, you always have the possibility not to fill out some data fields in case you are not collecting the data, or you cannot report some data. You always have the option to select the following options: "do not wish to disclose this information", "do not routinely collect this information", "risk of identification", or "unknown for another reason".

Nonetheless, we encourage organisations to try and fill out as much of the data fields as possible to allow for better quality of analysis.

What if my organisation uses a different safeguarding definition?

The Scheme defines the main categories of sexual misconduct (sexual exploitation, abuse and harassment) to ensure harmonisation and common understanding on definitions. Nonetheless, if your organisation uses a different classification – for instance, you do not include harassment, like some of our Members – you can still report on the incidents which your organisation includes in their definition of safeguarding.

A disclaimer is included in all reports, stipulating that not all organisations use the same definition of SEAH.

The Scheme uses definitions of SEAH as set out in the latest CHS Alliance guidance, including the SEAH Investigation Guide (2022) or the PSEAH Implementation Quick Reference Handbook (2021), which in turn have their basis in the UN Secretary General bulletins ST/SGB/2003/13 and ST/SGB/2019/8.

The definitions used are the following:

- Sexual exploitation: "any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes. It includes profiting momentarily, socially, or politically, socially or politically from the sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationships."
- Sexual abuse: "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual assault (attempted rape, kissing/touching, forcing someone to perform oral sex;/touching) as well as rape. Under UN regulations, all sexual activity with a child (under the age of 18 years) is considered to be sexual abuse".
- Sexual harassment: "unwanted conduct of a sexual nature. It can happen to any gender and be physical (e.g., touching), verbal (e.g. offensive comments or phone calls), or non-verbal (e.g. display of offensive materials). It can involve a pattern of behaviour or a single incident."

How will data protection be guaranteed?

A thorough analysis of risks for data protection was conducted by the CHS Alliance, following the DPIA (data protection impact assessment) process, which in turn informed the development of a Data Protection Protocol.

The Protocol outlines the process and steps for reporting, detailing the data protection measures which will be guaranteed at each step. It also examines the levels and severity of identified risks, and outlines the mitigation measures to reduce or eliminate those risks.

Data Protection is guaranteed through three key steps, creating multiple layers of security, with each phase of the system created as a separate entity, with no way to link the entities to one another to ensure maximum data security.

With this three-level process, no file linked to a specific organisation is ever hosted on the server, only aggregated and anonymised data on SEAH cases from multiple organisations is stored.

All servers hosting data are protected by double authentication (MFA) with access restricted to the CHSA Scheme lead and PSEAH Manager. The data stored on the server includes absolutely no personally identifiable data for the organistions, victim/survivor or alleged perpetrator, as none is collected as part of the Scheme in order to preserve confidentiality.

As such, the risks for organisations who report are very low.

If you want to know more about how data is protected in the PSEAH Harmonised Reporting Scheme or in accessing the Data Protection Impact Assessment & Data Protection Protocol, please contact Mathilde Belli (<u>mbelli@chsalliance.org</u>).

How is the Scheme meeting GDPR's requirements?

No personal information, defined by the GDPR as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" is collected as part of the Scheme.

Your organisation retains ownership of your own data and determines what can be shared based on the internal procedures of your organisation. The CHS Alliance will only retain and store data in a way that will not allow to identify any individuals or organisations, in accordance with GDPR retention policies.

The data stored will only be aggregated data, meaning it will not be identifiable or linkable to your organisation, and will only be stored and used for purposes of data analysis and learning in line with the objectives of the SEAH Harmonised Reporting Scheme.

Only the CHS Alliance SEAH Harmonised Reporting Scheme lead and PSEAH Manager will have access to the aggregated data.

How will data be analysed and shared?

All the data inputed into the platform by the member organisations is aggregated into a master database. This allows for all incidents to be anonymised (i.e. they can no longer be linked to a specific organisation, in addition to containing no identifiable information on the victim/survivor or alleged perpetrator). The SEAH Harmonised Reporting Scheme team will then use the aggregated data to conduct an analysis to identify trends and patterns on the main data fields as well as key learning from the data.

The bi-annual trends analysis will be shared in a public report, similar to the one published at the end of the pilot, accessible <u>here</u>.

In addition, Members of the Scheme will have access to dashboards and data visualisation tools on the platform, to be able to perform more advanced data analysis or to tailor the analysis to their needs. For instance, looking at trends per country. They will nonetheless not have access to the list of incidents, but only to data visuals containing the aggregated and anonymised data.

Trends may be used by members to inform their organisational strategies, resource mobilization, advocacy, etc.

Will donors be encouraged to align too?

Donors will be actively encouraged to endorse the Scheme and align their reporting requirements with those of the Scheme.

During the pilot, donors were approached and encouraged to assess the feasibility of aligning their reporting requirements to those of the Scheme, and to provide feedback for this to be feasible.

Discussions will continue as part of the scale up to encourage donors to align their mandatory requirements for grantees on SEAH with those of the Scheme, and to recognise the Scheme as a marker of accountability and transparency on SEAH.

Although this is a process that may take time, the Scheme team is committed to working with donors to reduce the reporting burden of organisations. Information on the Scheme specifically tailored to donors has been developed and is available.

Is this Scheme linked to the Misconduct Disclosure Scheme?

The <u>Misconduct Disclosure Scheme</u> and the SEAH Harmonised Reporting Scheme are separate interagency initiatives that are closely interlinked in their effort to address SEAH in the aid sector.

The MDS aims specifically at stopping perpetrators of sexual misconduct moving between organisations undetected, by facilitating the sharing of misconduct data between employers, improving reference checks and safer recruitment processes. It is currently implemented by over 220 organisations.

While the two schemes have different approaches and areas of focus, they both look at creating a more transparent and collaborative environment among organisations in the aid and development sectors, recognising that SEAH is an existing and ongoing problem that requires collective and coordinated answers, at different levels and from different entry points, as well as a shift in the dominant culture.

Is an expansion of data fields planned in the future?

Collecting and reporting too many details on the nature of the incident, profile of the victim/survivor and the alleged perpetrator creates a high risk for identification, therefore compromising confidentiality and anonymity.

Organisations who took part in the consultations and pilot which informed the design of the Scheme expressly requested that only top-line data was collected to ensure confidentiality and to ensure all SEAH data remains totally unidentifiable.

As part of their case management, each organisation can decide what data to collect and if they wish to collect more in-depth data, but only top line data should be reported through the Scheme to maintain confidentiality and anonymity.

Nevertheless, an annual review process will be organised to collect feedback on the Scheme.

If you feel a specific data field should be added, we encourage you <u>contact us</u>. All review requests will be submitted to the Scheme's Steering Committee.

Can I join if my organisation has limited capacity on SEAH?

Yes, all organisations, regardless of their capacity, can join the Scheme if they commit to reporting SEAH data using the harmonised framework.

Relying on an already functioning and technically sound SEAH collection and reporting system with strong data protection measures in place can be helpful for your organisation if you have limited capacity and resources to develop your own. This saves you from having to create a system internally for reporting.

Additionally, you will be able to learn from the data analysis and subsequent discussions with peers, helping you to better target fund requests or adapt your program.

Technical support will also be provided to National and Local NGOs with limited resources to build their capacity and guide them to in successfully implementing the scheme (for more information, please <u>contact us</u>).

Our <u>current members</u> are very diverse and their capacity vary, so we encourage all organisations to join, regardless of their capacity and resources, if they wish to commit to harmonising their collection and reporting of SEAH data with the scheme.

Which organisations are already part of the Scheme?

The list of Member organisations can be found on our webpage.

Can I speak with a Member to learn from their experience?

Yes. We encourage our members to connect with each other, exchange information and learn from their peers.

The objective of having harmonised data on SEAH is also to create a community of practice where peer-to-peer learning is encouraged based on the evidence collected. You can <u>contact us</u> to ask to be connected with other members.

How is the Scheme governed?

The initial development of the Scheme adopted a participative and collaborative approach by developing the harmonised framework with the input from 60 participants organisations collected throughout a survey, and by piloting the draft framework for a year with 25 diverse organisations.

The Scheme is also governed by a Steering Committee composed of INGO, NNGO, private sector organisations, United Nations representatives, Safeguarding Networks and donors.

The Steering Committee is the forum where concertation on the design of the framework were undertaken and decisions validated, but also a group responsible for actively promoting the scheme externally to ensure new members join the pilot. s much as possible, Members are consulted on decisions regarding the Scheme through surveys or other types of methods, to ensure a participatory approach rather than a top-down approach.

The overall management of the scheme and project is led by the CHS Alliance.

Will technical support be provided to Members of the Scheme?

Yes, participating organisations, through the feedback channels, will be able to engage actively with the Steering Committee and team managing the Scheme.

Virtual "workshops" or "webinars" will be specifically organised and held to support peer learning and to provide technical support to smaller participating organisations. Opportunity to share information, lessons learned, good practices, practices will be available to continue strengthening the capacity of Members and encourage peer-to-peer learning.

The scheme will also propose opportunities for implementing organisations to build their capacities with the following activities:

- National and local NGOs implementing the harmonised framework will be offered mentoring sessions to strengthen their internal reporting mechanisms.
- Information will be provided on available resources and sources of information relating to PSEAH. This will take the form of guidance notes and links or sign posting to relevant websites and material. The Scheme will work closely with the Safeguarding Resource and Support Hub (RSH), part of the Steering Committee, to connect members with resources and learning opportunities.
- Good practices and learning across the scheme will be documented and shared with all organisations participating in the scheme. Organisations that have developed and gained benefits from establishing an internal data reporting system will be invited to share their experiences through blogs or presentation during webinar.

Can I join if my organisation can only share aggregated data?

The purpose of the SEAH harmonised reporting scheme is for all partners to report data on individual cases using a harmonised template. We therefore ask organisations to report their data using the harmonised framework in order to be part of the scheme, rather than their aggregated data from their annual reports.

This allows for us to compile all the data we receive from different organisations, and do joint analysis, which would not be possible with aggregated data only, particularly if the data isn't exactly the same.

If you are concerned about sharing aggregated data, please do remember that data will never be shared externally disaggregated, and no organisation's name will ever be mentioned in the data analysis.