



## Statement of Concern Regarding Privacy and Data Protection in the Upcoming National Population Census

*Kampala, Monday 15th April, 2024* - We, the Unwanted Witness, express our deep concerns regarding the forthcoming national population census scheduled to take place from 9th May 2024 to 19th May 2024, as mandated by the Uganda Bureau of Statistics (UBOS) Act, 1998. While recognizing the pivotal role UBOS plays in collecting and disseminating statistical information for national development, we underscore the paramount importance of safeguarding individuals' privacy and data protection rights in the process.

Census data inherently comprises sensitive personal information, including but not limited to names, addresses, birthdates, and occasionally more delicate details such as ethnicity or religion. As custodians of such data, it is imperative for UBOS to prioritize robust measures to ensure the privacy and security of individuals' information throughout the census enumeration process and beyond.

Our concerns encompass various facets of data protection, including but not limited to:

1. **Data Security:** Implementing strong encryption protocols to secure census data both in transit and at rest to mitigate the risk of unauthorized access or data breaches.
2. **Anonymity and Confidentiality:** Ensuring strict access controls and limiting data access to authorized personnel only to maintain individuals' anonymity and confidentiality.
3. **Data Misuse:** Conducting comprehensive privacy impact assessments to identify and mitigate potential risks of data misuse or unauthorized disclosure.
4. **Data Retention:** Establishing clear guidelines for data retention and disposal to minimize the risk of prolonged storage of personal data beyond its necessary purpose.
5. **Data Sharing:** Providing transparent information to the public regarding data collection methods, purposes, and the extent of data sharing with third parties, if any.

In addition to addressing these concerns, we have also [communicated](#) our apprehensions to the Executive Director of the Uganda Bureau of Statistics

regarding the same issues.

In light of the aforementioned concerns, we urge UBOS to proactively address these issues by adopting the following recommendations:

1. Implementing robust encryption protocols to secure census data both in transit and at rest.
2. Enforcing strict access controls and limiting data access to authorized personnel only.
3. Conducting comprehensive privacy impact assessments to identify and mitigate potential risks to individuals' privacy.
4. Providing transparent information to the public regarding data collection methods, purposes, and rights of individuals.
5. Establishing clear guidelines for data retention and disposal to minimize the risk of unauthorized access or data breaches.

Furthermore, it has come to our attention that as of 11th April 2024, UBOS's registration status at the Personal Data Protection Office register is "**Expired.**" We emphasize the critical importance of ensuring an "**Active**" status by the commencement of the census on 9th May 2024, to adhere to regulatory requirements and instill public confidence in the data protection measures undertaken.

In conclusion, while acknowledging the indispensable role of census data in informed decision-making and policy formulation, it is imperative for UBOS to prioritize the protection of individuals' privacy and data security rights. We stand ready to collaborate with UBOS and relevant stakeholders to ensure that the upcoming national population census is conducted with the highest standards of privacy and data protection.

Signed,



Dorothy Mukasa

**Executive Director**

**Unwanted Witness**



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## About Unwanted Witness

Unwanted Witness is a Civil Society Organization founded in 2012 to promote online freedoms and protect digital rights in Uganda. The organization aims to create a safe and secure digital environment for citizens and promote the responsible use of technology.

Unwanted Witness has become a leading voice in advocating for internet freedoms, and digital rights, particularly the right to privacy, digital identity, digital inclusion, and freedom of expression. The organization aims to empower citizens to use technology in a safe, secure, and effective manner while holding public and private entities accountable for digital rights violations.

The organization achieves its mission through research, advocacy, and capacity building. Unwanted Witness conducts research to identify digital rights violations, trends, and threats, and uses this information to advocate for policy and legal reforms. The organization also provides digital security training and support to human rights defenders, journalists, and vulnerable groups to help them protect themselves online.

In addition, Unwanted Witness Uganda engages in public education and awareness campaigns to promote digital literacy and responsible online behavior. The organization also monitors internet shutdowns and other forms of digital censorship and responds to them by raising awareness and advocating for the restoration of access to the internet.

For more information: [www.unwantedwitness.org](http://www.unwantedwitness.org)