



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 03-Apr-2018 | Report No: PIDISDSA22496



BASIC INFORMATION

A. Basic Project Data

Country Western Africa	Project ID P161329	Project Name West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 19-Mar-2018	Estimated Board Date 31-May-2018	Practice Area (Lead) Social Protection & Labor
Financing Instrument Investment Project Financing	Borrower(s) Republic of Cote d'Ivoire, Republic of Guinea	Implementing Agency Office of the Prime Minister (Primature), ECOWAS Commission, Organisation National de l'Identification (ONI)	

Proposed Development Objective(s)

The Program Development Objective (Pr.DO) is to increase the number of persons in participating countries who have government-recognized proof of unique identity that facilitates access to services.

The Project Development Objective (PDO) for Phase 1 of the Project is to increase the number of persons in Côte d'Ivoire and Guinea who have government-recognized proof of unique identity that facilitates access to services.

Components

- Component 1: Strengthening the legal and institutional enabling environment
- Component 2: Establishing robust and inclusive foundational ID systems
- Component 3: Facilitating access to services through IDs

Financing (in USD Million)

Financing Source	Amount
International Development Association (IDA)	92.25
IDA Grant	29.85
Total Project Cost	122.10

Environmental Assessment Category



B - Partial Assessment

Decision

The review did authorize the preparation to continue

B. Introduction and Context

Regional Context

- 1. Roughly 40% of Sub-Saharan Africa (SSA)—approximately 502 million people—lack official proof of identification¹ and, consequently, face significant barriers to accessing critical services and becoming full members of society; exclusion is worst for the poorest.²** Identification can serve as a key enabler for eradicating poverty and for achieving a broad range of development outcomes. Target 16.9 of the Sustainable Development Goals (SDGs) recognized the centrality of proof of identification in assuring an inclusive world: to “provide legal identity for all, including birth registration” by 2030.
- 2. Increasing access to identity and building unified ID systems is beneficial at all levels—the individual, the state and the regional.** Without government-recognized credentials, such as birth certificates, unique identification numbers (UNIs) or other ID credentials, people are frequently denied access to rights and to public services; the most vulnerable people—those who might otherwise benefit most from social protection and jobs (SPJ) services—are the most adversely affected. Reciprocally, governments also struggle to authenticate and deliver services to the unregistered and unidentified. Further, regional interoperability of IDs could help to drive down costs, as well as facilitate integration, encourage the movement of peoples and goods, grow trade and improve security, with benefits accruing to both individual member states and to the ECOWAS region at large. *Wuri*, a West African counting game, is, like this project, about “making everyone count”.³
- 3. One of two different perspectives is typically taken for ID systems: either a broad, nationwide ID perspective, or a narrow, sectoral one, wherein functional IDs are used to deliver services, and which thus leads to a fragmented, untrustworthy identification landscape with substantial inefficiencies and costs for both the private and public sectors.** Single-use, functional IDs are costly, administratively inefficient and undermine effectiveness, with the negative effects being disproportionately borne by the poor and marginalized groups. Further, multiple, parallel ID systems result in poor data, confusion and duplicative spending of scarce resources. In 2015, one-off voter registration systems cost African states approximately US\$1.4 billion. These costs include the production of biometric ID cards. Costs typically range from US\$5–10 per card but can go as high as US\$46 (in Côte d’Ivoire); in Nigeria, a one-off biometric,

¹ As the project is a technical one, and is developed on the basis of a precise set of definitions and understandings, a detailed glossary of terms has been prepared and placed at the beginning of the document (see Glossary, above).

² ID4D, Global Dataset, 2017, <https://data.worldbank.org/data-catalog/id4d-dataset>.

³ *Wuri*, one of the most social of games, is also one of the most ancient board games in the world; in other parts of the world, it is called *congkak* (Malaysia, Indonesia), *pallanguzhi* (South India) or *mancala* (from *naqala* in Arabic).



voter-registration exercise cost US\$8.6 per voter and totaled approximately US\$627 million, yet registered only 70 million voters of its roughly 95 million eligible voters (less than 74%).⁴

4. **Foundational ID (fID) systems provide government-recognized ID credentials (fIDs) upon which both the public and private sector can subsequently rely for transactions and delivery.** In order for fID systems to properly serve their purpose of allowing individuals to prove their identity (as opposed to establishing their existence⁵), fID systems should both (i) sync with civil registration (CR) systems and (ii) be interoperable with sectoral systems (e.g., SPJ, health, education, financial services, population, or travel), without connoting legal status.⁶ Robust fID systems take a basic set of an individual's attributes—such as biometrics and biographic data that exclusively describe that person—and randomly assign an unintelligible UNI. Critically, fID systems should be underpinned by a robust legal and institutional framework. As the fID and the CR systems together compose the fID ecosystem, they should interrelate and support each other through limited data sharing, as carefully structured and safeguarded by the legal framework.

5. **Roughly 53% of the population of the ECOWAS region—about 196 million people—are unregistered and do not have proof of identification.**⁷ ECOWAS was founded with the goal of promoting economic integration across member states. The movement of peoples within ECOWAS is seven times that of any other SSA sub-region, and 70% of all ECOWAS migrants travel within the region. Côte d'Ivoire is the largest host state, with over 2.3 million non-Ivoirians present in its territory, and is the largest host to Guineans of any ECOWAS member state.⁸ ECOWAS is also host to large populations of displaced and stateless persons due to historic and ongoing fragility. Nearly half of ECOWAS member states were classified as Fragile Situations in FY18 by the World Bank.⁹ While inherent difficulties in measuring stateless populations lead to substantial variations, there are approximately 2.7 million internally displaced persons and 300,000 refugees in ECOWAS.¹⁰ The stateless population in Côte d'Ivoire alone is 700,000 people, with a further 750,000 people being at risk of statelessness in the region.¹¹

Sectoral and Institutional Context

1. Key Benefits of fID Systems

6. **Establishing fID systems that are mutually recognizable across ECOWAS member states would yield both domestic and regional benefits due to free movement, as well as a host of other services, from SPJ to finance and health.** fID systems can reduce overall costs to government and to beneficiaries

⁴ Alan Gelb, Anna Diofasi. Biometric Elections in Poor Countries: Wasteful or a worthwhile investment? Center for Global Development, <https://www.cgdev.org/sites/default/files/biometric-elections-poor-countries-wasteful-or-worthwhile-investment.pdf>. For population statistics in Nigeria, see ID4D Global Dataset, at <https://data.worldbank.org/data-catalog/id4d-dataset>.

⁵ As already noted, the fID system is, together with the CR system, the essence of the fID ecosystem.

⁶ Some legal identification systems, such as the national ID programs of Peru, Pakistan and many other countries, are linked to national status, while others are not. India's Aadhaar system, for example, has de-linked the concept of nationality from identification in order to establish the uniqueness of the country's 1.2 billion residents and create a platform for secure authentication by third parties for service delivery. See Gelb & Clark (2013). Aadhaar means "foundation" or "base".

⁷ ID4D, Global Dataset, 2017, <https://data.worldbank.org/data-catalog/id4d-dataset>.

⁸ M. Awumbila, Y. Benneh, J.K. Teye and G. Atiim, *Across Artificial Borders: An Assessment of Labour Migration in the ECOWAS Region*, https://publications.iom.int/system/files/pdf/ecowas_region.pdf?language=en.

⁹ Côte d'Ivoire, Gambia, Guinea-Bissau, Liberia, Mali, Sierra Leone and Togo are classified as fragile states.

¹⁰ UNHCR Population Statistics (2015), Populations of concern, <https://goo.gl/bsOSuD>.

¹¹ <http://www.unhcr.org/ecowas2015/Nationality-Migration-and-Statelessness-in-West-Africa-REPORT-EN.pdf> and <http://www.refworld.org/docid/58594d114.html>. The Côte d'Ivoire report notes that this country has the highest population of people effected by statelessness in the sub-region.



by eliminating unnecessary spending on fragmented functional ID systems. For example, by relying on *f*ID systems to provide government-recognized IDs for deduplication of individuals and authentication at the point of service delivery, social safety net programs could focus on the processes of outreach, intake and registration, eligibility assessment, decisions on enrollment of beneficiaries and benefits and service packages, and managing data on beneficiaries.

7. **Reliance on *f*ID systems improves HD- and SPJ-program service delivery, particularly to women¹², children, and persons with disabilities.**¹³ Through *f*ID systems, government-recognized IDs can be issued to the entire population, therein improving access to, and quality of, frontline programs. It can greatly improve the efficiency of SPJ programs, such as cash transfers and pensions, as well as reduce errors of inclusion and exclusion, and improve monitoring and resolution of error, fraud and corruption (EFC). As such, assistance is more likely to reach intended beneficiaries. For example, Pakistan's national ID system underpinned the rollout of a cash transfer program for poor women, therein enabling a 94% increase in female enrolments between 2008 and 2014¹⁴; as a result of this transfer, households spent more on nutrition and on child education, and women's household decision-making increased markedly.^{15,16} Health sector programs have particularly benefited from the use of UNIs, which have increased coverage, facilitated inter-agency cooperation and improved management and treatment of illnesses, both chronic and acute.¹⁷ *f*ID systems can help monitor disease outbreaks (as in the case of Ebola) and facilitate cross-border emergency responses by aggregating and sharing anonymized patient-level data (*e.g.*, cause of death) across communities and borders, thereby helping countries to tackle pandemics, especially in high-migration areas.¹⁸ Botswana has used its national ID to uniquely identify patients and enable an advanced monitoring system that has increased patient retention and facilitated evaluation and scale-up.

8. **At the regional level, *f*ID systems can be interoperable across borders, ensuring secure and seamless interactions for public and private sectors.** *f*ID systems can unleash a powerful cascade of public and private resources, enabling positive development outcomes. For instance, the European Union (EU) is obliging its member states to develop an interoperable, pan-EU, electronic identification and trust services (eIDAS) ecosystem that enables cross-border, electronic authentication with the same legal status as paper-based processes, regardless of which member state is the issuer.¹⁹ Further, as the eIDAS system is outcome-oriented, each nation empowered to take its own approach.

¹² *The Identification for Development (ID4D) Agenda: Its Potential for Empowering Women and Girls*,

<https://openknowledge.worldbank.org/bitstream/handle/10986/22795/The0identifica0s000background0paper.pdf?sequence=1&isAllowed=y>.

¹³ The Role of Identification in Ending Child Marriage. ID4D, <http://documents.worldbank.org/curated/en/130281472492551732/pdf/107932-WP-P156810-OUO-9-Child-Marriage.pdf>.

¹⁴ OPM. 2010-2017. Evaluating Pakistan's flagship social protection programme (the Benazir Income Support Programme). Oxford Policy Management, <http://www.opml.co.uk/projects/evaluating-pakistan%E2%80%99s-flagship-social-protection-programme-benazir-income-support-programme>.

¹⁵ ID4D, Making Everyone Count, <http://pubdocs.worldbank.org/en/726141507833458171/ID4DBrochure101217.pdf>.

¹⁶ Pakistan: Building Equality for Women on a Foundation of Identity, <http://www.worldbank.org/en/news/feature/2016/02/04/pakistan-building-equality-for-women-on-a-foundation-of-identity>.

¹⁷ Programs to address the HIV/AIDs crisis in Botswana have used government-recognized IDs to enable an advanced monitoring system that has increased patient retention and facilitated evaluation and scale-up.

¹⁸ Countries are better prepared to tackle pandemic diseases by information-sharing that aggregates anonymized patient-level data (*e.g.*, cause of death) across communities and borders. World Bank. (2018). Digital Identification for Health: Emerging Use Cases. Washington, DC: World Bank.

¹⁹ Regulation (EU) No. 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0910&from=EN>.



9. **Building robust fID systems with authentication processes that allow for mutual recognition across the region is a multifaceted challenge.** ECOWAS member states are all at different stages of design or development in (i) establishing their own robust legal and institutional frameworks, (ii) building systems to register and enroll individuals, and (iii) enabling authentication processes for access to services through interoperability.

2. State of Legal and Institutional Frameworks in ECOWAS Member States

10. **While legal and institutional frameworks across ECOWAS member states tend to be weak and fragmented, the regional trend is towards building the sufficiently-robust frameworks needed for reliable and trustworthy fID systems.** Of the 15 ECOWAS member states²⁰, 9 member states have specific data protection legislation, 6 of which have also created a central, independent data protection agency. Relatedly, 9 member states have specific, centralized agencies dealing with identification, 6 of which have also passed national ID legislation. Fundamentally, the legal and institutional framework should guarantee data protection, individual privacy, non-discrimination, and inclusion. On that basis, the institutional and governance arrangements must engender a culture of trust between the state and individual recipients. (See Table 1.)

Table 1: Legal and Institutional Frameworks for identification and data protection in West Africa

ECOWAS Member States	Data Protection Legislation	Data Protection Agency	National ID Legislation	National ID Agency
Benin	✓	✓	✗	✗
Burkina Faso	✓	✓	✓	✓
Cabo Verde	✓	✓	✗	✓
Côte d’Ivoire	✓	✗	✗	✓
The Gambia	✓	✗	✗	✓
Ghana	✓	✓	✓	✓
Guinea	✓	✗	✗	✗
Guinea Bissau	✗	✗	✗	✗
Liberia	✗	✗	✓	✓
Mali	✗	✗	✗	✗
Morocco*	✓	✓	✗	✗
Niger	✗	✗	✗	✗
Nigeria	✗	✗	✓	✓
Senegal	✓	✓	✗	✗
Sierra Leone	✗	✗	✓	✓
Togo	✗	✗	✗	✓

²⁰ Benin, Burkina Faso, Cabo Verde, Côte d’Ivoire, The Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Nigeria, Niger, Mali, Senegal, Sierra Leone and Togo. Morocco recently joined ECOWAS, although it is not yet a full member, <http://www.ecowas.int/member-states/>.



3. State of Existing National ID and CR Systems in ECOWAS Member States

11. Coverage of national IDs and birth registration remains low across ECOWAS member states (see Table 2). Where registration exists, national ID systems are of poor quality, fragmented, and wasteful. Civil registries capturing legal acts (primarily birth, death, marriage and divorce) are largely paper-based, incomplete, insecure, and often unreliable (e.g., suffering from poor management, deterioration, destruction). The mixture of often *ad hoc*, hybrid paper-and-digital-based registries prevents sustainable, quality recordkeeping. A regional reform would mitigate these concerns and benefit all ECOWAS member states.

Table 2: Birth Registration and ID Registration Coverage²¹

ECOWAS Member States	Population	Birth Registration		National ID	
		Rate Coverage (Age 0-5)	Paper/Digital	Coverage	Paper/Digital
Benin	11,459,000	80.2%	Paper	68%	Paper
Burkina Faso	19,173,000	76.9%	Paper	36%	Paper
Cabo Verde	539,560	91%	Digital	95%	Digital
Côte d'Ivoire	23,816,000	55%	Paper	45%	Digital
The Gambia	2,120,000	52.5%	Paper	No data	Digital
Ghana	28,210,000	62.5%	Paper	2.1%	Digital
Guinea	13,291,000	57.9%	Paper	No data	Paper
Guinea Bissau	1,816,000	39%	Paper	87%	Paper
Liberia	4,730,000	24%	Paper	No data	Paper
Mali	18,690,000	80.8%	Paper	No data	Digital
Niger	21,564,000	63.9%	Paper	No data	Paper
Nigeria	191,836,000	29.8%	Paper	6%	Digital
Senegal	15,410,000	73%	Paper	No data	Digital
Sierra Leone	7,396,000	78%	Paper	No data	Paper
Togo	7,606,000	77.9%	Paper	9%	Paper

4. State of Access to Services Authenticated through National IDs in ECOWAS Member States

12. Across ECOWAS, access to services is greatly hindered by inadequate national ID systems. Even when individuals are enrolled in a national ID program, additional sources may be required to prove identity, as these systems may be weak, paper-based and fail to guarantee uniqueness. In many countries, the principal form of government-recognized IDs is the birth certificate; however, even in such countries, not everyone has one, and, even when registered, not everyone receives one. Across ECOWAS member states, a host of obstacles—secondary acquisition costs (Côte d'Ivoire, Ghana, Togo), lack of parental

²¹ World Bank Group, *The State of Identification Systems in Africa: Country Briefs* (Washington, DC: World Bank, 2017) (License: CC BY 3.0 IGO), <http://hdl.handle.net/10986/28310>.



motivation (Chad, Togo), distance (Nigeria²²), persistent conflict (Niger²³)—cause significant burdens and hinder identification. In Côte d'Ivoire, only 55% of the population (over the age of 5) is registered, yet birth certificates are an annual prerequisite to school enrollment.²⁴

13. Lack of government-recognized IDs results in inefficient implementation of HD- and SPJ-programs. Without government-recognized IDs, beneficiaries are often unable to open bank accounts, and, where they can, have severe transaction limits imposed. Moreover, the proliferation of program-specific (functional) IDs hinders the consolidation of beneficiary registries. Creation of social registries is affected by the lack of government-recognized IDs (Côte d'Ivoire, Nigeria), making intake, registration, and eligibility-assessment inefficient. Further, without government-recognized IDs, both crosschecking self-reported data for eligibility against administrative data, and authenticating beneficiaries at pay points, is cumbersome and frequently inaccurate.

5. *Relevance to Higher Level Objectives*

14. Building fID systems in participating ECOWAS member states that are interoperable will have substantial socioeconomic benefits at both the regional and national levels over the medium-to-long term. At the national level, a fID system will facilitate access to services, especially for those who are vulnerable and excluded, serving as a key enabler for social inclusion and poverty reduction. At the regional level, interoperable fID systems ; will enable a broader range of development outcomes in the region.

15. Interoperable fID systems will help ECOWAS achieve its vision of freedom of movement, substantially advancing its goal of economic integration across its member states, while also advancing a variety of cross-border development objectives. The ECOWAS vision is “the creation of a borderless region [...] where the population enjoys free movement, has access to efficient education and health systems and engages in economic and commercial activities while living in dignity in an atmosphere of peace and security.”²⁵ The Protocol relating to Free Movement of Persons, Residence and Establishment puts forward a three-phased approach for achieving “complete freedom of movement” based on the right to enter, reside, and establish economic activities in the territory of member states.

16. A progressive, collaborative approach among ECOWAS member states, based on common standards for interoperable fID systems for the region, would be an effective stepping stone towards achieving an ENBIC. In 2014, ECOWAS Heads of State substantially built upon the Free Movement Protocol when, in dialogue with national immigration authorities, they approved the ECOWAS National Biometric ID Card (ENBIC), which might be used as a regional travel document. While the fID systems will collect only minimal data—less than that required for the ENBIC—all data capture will be done in accordance with ECOWAS technical specifications. As such, while the fIDs are not replacements for the ENBIC, and do not of themselves confer any travel rights, they are significant stepping stones for each country to advance to rollout the ENBIC. Those desiring an ENBIC will need to provide their fIDs, as well

²² In Nigeria, for instance, birth registration in rural areas (19%) is significantly lower than in urban areas (50%).

²³ In conflict-affected regions, such as Niger Delta, birth registration rates are also considerably lower.

²⁴ While the local chief may vouch for school enrolment up to elementary school, such is not acceptable proof of ID for secondary education or above.

²⁵ ECOWAS, *Protocol Relating to Free Movement of Persons, Residence and Establishment A/P.1/5/79* (29 May 1979),

http://documentation.ecowas.int/download/en/legal_documents/protocols/PROTOCOL%20RELATING%20TO%20%20FREE%20MOVEMENT%20OF%20PERSONS.pdf.



as any other additional information required by the ENBIC. The EU's experience with eIDAS offers important guidance on the utility of having a respected, central authority act as facilitator (in that case, the European Commission). The ECOWAS Commission provides an effective means of shepherding through a coherent regional approach while also respecting country particularities and ownership, just as with eIDAS.

17. **A progressive, collaborative approach among ECOWAS member states, based on common standards for interoperable fID systems for the region would facilitate regional integration.** Interoperable fID systems would especially benefit people who do not need full ENBIC benefits but who would use a low-cost credential for their daily needs. At the same time, basic, interoperable, fID systems lay the basis for deeper regional integration and go especially far in building the basis of the digital economy upon which secure, electronic transactions can occur, supporting regional exchange of goods and services. fID systems advance a variety of cross-border development objectives, including financial inclusion, access to healthcare and education, and overall better access to private and public services at both the regional and national levels²⁶, and are basic prerequisites to building marketplaces along the lines of Alibaba or eBay in the region. For individuals, entrepreneurs, or small and medium enterprises (SMEs), regional integration would dramatically reduce costs (e.g., logistics, transport, banking, cross-border commerce), especially on the region's most frequently used routes and corridors. (See Annex 1 for country-specific objectives.)

18. **Achieving a monetary union has long been another objective of ECOWAS and is intended to accompany a broader integration process that would include regional trade and common institutions.** ECOWAS is moving towards greater trade integration. The West African Economic and Monetary Union (WAEMU)²⁷—the sub-regional bloc of Benin, Burkina Faso, Côte d'Ivoire, Guinea-Bissau, Mali, Niger, Senegal, and Togo—is of growing significance. Efforts to create a pan-African Continental Free Trade Area (CFTA)²⁸ are also making significant headway. Interoperable fID systems could greatly facilitate such initiatives, significantly deepening financial-services integration across the region. Early discussions with WAEMU indicate interest in leveraging robust ECOWAS-wide interoperable fID systems to facilitate “know-your-customer” (KYC) financial requirements to be done through the Central Bank of West African States (BCEAO). Furthermore, financial services, including mobile money, can be offered more efficiently at a regional level, as recognized by the harmonization of rules in the CFA *franc* zone. Mutual recognition will particularly facilitate access to markets for smaller countries, helping trade and labor market integration.

19. **Supporting ECOWAS to achieve a regional framework for mobility and broader integration through fID systems will support the World Bank Group's forthcoming *Africa: Regional Integration & Cooperation Assistance Strategy*.** In particular, it responds to Priority 3, namely, “Scale-up access to quality public services and entrepreneurship through complementary regional solutions” within the development of a regional ID system, has been identified as a flagship initiative. The project also contributes to fulfilling two other Strategy objectives, namely, “Generate Economic Dynamism along

²⁶ Identification in the Context of Forced Displacement, <http://documents.worldbank.org/curated/en/375811469772770030/pdf/107276-WP-P156810-PUBLIC.pdf>.

²⁷ West African Economic and Monetary Union, <http://www.uemoa.int/en>.

²⁸ Continental Free Trade Area, <https://au.int/en/ti/cfta/about>.



Regional Economic Corridors” (Priority 2) and “Develop Functioning Regional Markets in ICT / digital, financial sector and mobility of skilled labor”

Development Objective(s) (From PAD)

The PrDO is to “Increase the number of persons in participating countries who have government-recognized proof of unique identity that facilitates access to services.”

The PDO for Phase 1 of the project is to “increase the number of persons in Côte d’Ivoire and Guinea who have government-recognized proof of unique identity that facilitates access to services.”

Key Results

20. The program will aim to provide government-recognized IDs (*f*IDs) to all individuals in participating countries, regardless of legal status. Progress is anticipated in the number of enrolled women, as well as in the number of previously-unregistered individuals, which is expected to substantially overlap with the vulnerable population. Another result will be to link key services, such as social safety net programs, to the *f*ID systems. Progress towards the PrDO will be measured through the following program-level outcome indicators:

- i. Beneficiaries with foundational, government-recognized ID credentials (or *f*IDs);
- ii. Legal framework established; and
- i. Key services linked to *f*ID systems.

21. **By the end of 2028, the program aims to increase the number of persons in participating countries who have government-recognized proof of unique identity for 100 million beneficiaries, i.e., 32% of the population in ECOWAS enabling them to use the ID system to access services**

22. **The PDO for the project aims to cover 80% of the cohort of the population in Phase 1 countries; approximately 22.5 and 12.5 million people in Côte d’Ivoire and in Guinea, respectively²⁹.** The outcome indicators for Phase 1 of the project will be the same as the PrDO indicators.

D. Project Description

23. **The proposed program structures each country-level operation around three main components: (i) Strengthening the legal and institutional framework; (ii) Establishing robust and inclusive foundational ID systems; and (iii) Facilitating access to services through IDs.**

24. **Under Component 1, the MPA will finance the preparation, development, and implementation of the legal and institutional framework necessary to structure robust *f*ID systems.** This component will also finance the development of an enabling legal and regulatory environment for linking the *f*ID and CR

²⁹ The combined figure of 35 million people is 80% of a population of 44 million (adjusted for growth) in countries at the end of Phase 1 (2024).



systems and provide for mutual recognition and authentication of services across participating ECOWAS member states.

25. **This Component will support the creation of fID systems based on the issuance of UNIs linked to biometric data, which will be collected in accordance with international quality standards. This Component will finance the design, development, and implementation of:** (i) the technical aspects of establishing a fID system, including mass registrations and supporting infrastructure; as well as open standards to reduce costs, avoid vendor lock-in, and provide flexibility for future adaptation; (ii) strengthening interoperability between fID and CR systems to ensure the data flow accounts for new births and deaths: integration should include issuance of a UNI at birth where uniqueness is ensured biometrically at a specified age, and retiring of UNIs for deaths registered in the CR system; (iii) developing basic methods of fID issuance (especially for remote areas); and (iv) communications, stakeholder engagement, GRM, and project management, including the implementation of the Social Management Plans.

26. **Component 3 will focus on service delivery at both the national and regional levels.** Specifically, this Component will support integration between the fID system and social safety net programs to facilitate access to services. To incentivize the uptake of fIDs, this Component will enable authentication of UNIs to facilitate access to social safety nets services. Other potential service sectors include public health (*e.g.*, patient tracking), social protection programs (*e.g.*, unconditional cash transfers), education (*e.g.*, student IDs), mobile communications (*e.g.*, SIM-card registration), and financial inclusion (*e.g.*, KYC). Take-up of the fIDs will be incentivized by linking the fID system to public services and national programs.

E. Implementation



Institutional and Implementation Arrangements

27. **While financing of fID systems will be done at the country level, overall, regional program coordination will be done through the ECOWAS Commission.** The Commission's role as a regional governing body is critical for ensuring the mutual recognition of country fID systems. The capacity of the ECOWAS Commission to coordinate and harmonize fID initiatives is key to the program's regional success. To this end, financial support in the form of an IDA grant of US\$5 million will be made available to the Commission to facilitate regional dialogue and to bolster its capacity. Internally, the Commission has identified its Directorate of Free Trade and Movement to lead an internal task force to implement this grant.

28. **At the country level, implementation will be carried out by PIUs.** Each country will separately design and develop specific fID implementation arrangements. In countries with national ID agencies that already have strong ID-reform mandates, the PIU could be housed within those agencies, therein helping to build institutional capacity and to ensure project alignment with national ID agendas. In countries without a suitable agency, the project would create a new, freestanding PIU, or, where possible, could leverage an existing PIU in order to minimize implementation costs.

29. **Project implementation in Côte d'Ivoire will be carried out by ONI.** In Côte d'Ivoire, reform of national ID systems is already underway, having been identified as a high priority reform by the Government. The Government recently took several important steps to advance the ID agenda, notably by formally giving ONI authority in the newly-created, central body set up to lead the way in developing a fID system.³⁰ With regard to project implementation, staffing of the PIU is underway. A Project Implementation Manual (PIM) will be prepared following Board approval. The procurement packages are being developed.

30. **Project implementation in Guinea will be carried out by a PIU housed within the Office of the Prime Minister (PMO or *Primature*).** As Guinea lacks an agency with either a clear mandate or with the inter-sectoral reach to execute the broader ID reform, the Government of Guinea has elected to anchor the project in the PMO until such time as a more permanent institutional arrangement for overseeing the fID system can be established. A project coordinator is being hired. The procurement packages are being developed. A PIM will be prepared following Board approval.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The project will work to develop interoperable foundational ID systems across ECOWAS member states. The aim will be to register all individuals in the territory of participating states. Starting with Côte d'Ivoire and Guinea in phase 1, the systems will be rolled out in a manner compatible with common regional standards, to which other countries will progressively be added.

³⁰ Arrêté n°079/PM/CAB (6 Feb. 2018).



G. Environmental and Social Safeguards Specialists on the Team

Alexandra C. Bezeredi, Social Safeguards Specialist
Gernot Brodnig, Social Safeguards Specialist
Maria Elena Garcia Mora, Social Safeguards Specialist
Abdoulaye Gadiere, Environmental Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The project will have no adverse environmental impact and is assigned category B due to the potential following social risks and impacts: a) potential exclusion of vulnerable or disadvantaged groups in accessing IDs and related services and thus increasing their marginalization; and b) potential breach of data privacy or improper use of data.</p> <p>The project design intrinsically avoids and mitigates these risks through: a) given that systems are designed to be universal, all persons in the territory are eligible, independently of nationality or other socio-economic characteristics; b) the development of strong legal and institutional frameworks, including on data protection through Component 1; c) data collected is limited to include biometrics, name and date of birth, gender etc.; and d) outreach strategies and communication campaigns are being designed in a way to remove obstacles to assure universality.</p> <p>In addition, as part of its due diligence, the World Bank is preparing a Preliminary Vulnerability Mapping and Social Risk Analysis to help inform the design of the project and provide relevant technical assistance to Borrowers to strengthen their social risk management capacity. As part of this Analysis, the Bank has consulted with development partners and has engaged representatives of selected marginalized groups to help strengthen the design of the operation.</p>



The Borrowers will prepare national-level Social Assessments with accompanying Social Management Plans. A Draft of said Terms of Reference of these Social Assessments were disclosed in the Borrowers' and Bank's external websites, prior to the completion of Appraisal. (Guinea - External WB Website: March 29, 2018 and in-country: March 28, 2018. Cote d'Ivoire - External WB Website: March 29, 2018 and in-country: March 29, 2018)

In addition, to strengthen its social risk management capacity, the Borrowers will prepare Stakeholder Engagement Plans, establish multi-level grievance redress mechanisms and retain external monitoring within three months of Effectiveness.

Natural Habitats OP/BP 4.04	No
Forests OP/BP 4.36	No
Pest Management OP 4.09	No
Physical Cultural Resources OP/BP 4.11	No

Indigenous Peoples OP/BP 4.10	No	There are no indigenous peoples as per the definition of OP 4.10 in either Côte d'Ivoire or Guinea, and thus OP/BP 4.10 Indigenous Peoples is not triggered. Nonetheless, the multilingual and multicultural richness of the countries, including the presence of pastoralists, requires consideration of certain ethnic groups that might be historically marginalized and thus that are less likely to participate in the project without culturally-appropriate outreach and consultation efforts. The Social Assessments and Communications and Engagement Plans will include these populations. Similar situations exist, and thus merit such consideration, in those countries expected to join the MPA.
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Involuntary Resettlement OP/BP 4.12	No	No civil works will be financed and no land acquisition is expected; therefore, OP/BP 4.12 Involuntary Resettlement is not triggered. Similarly, the subsequent phases of the MPA are not expected to involve land acquisition. This will be assessed during the preparation of each phase.
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Safety of Dams OP/BP 4.37	No
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Projects on International Waterways OP/BP 7.50	No
Projects in Disputed Areas OP/BP 7.60	No

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project has been assigned category B due to the concern that formalizing an identification system could solidify existing patterns of exclusion and discrimination. Historically, ID systems have led to exclusion because of gaps in nationality laws and their application, having importunately negative impacts upon marginalized groups. However, as the proposed project will finance universal foundational ID systems aspiring to include all persons in the territory of the country, fear of discrimination on the basis of legal status (e.g., migrant labor, refugees, stateless persons) will be obviated. The aim will be to enroll all persons in the territory of the state.

Further, particular attention will be made to assuring that marginalized groups—including orphans and vulnerable children (OVC), women, elderly persons, persons with disabilities, persons belonging to religious, ethnic and other minority groups, migrants, refugees, asylum seekers, internally displaced persons, border populations, non-citizens, and stateless persons, among others—and those who have been historically excluded from accessing identification or who are harder to reach are included. Reaching so-called “last mile” groups is critical because, as proof of identity becomes increasingly ubiquitous and necessary for accessing services, non-registered groups face increasingly substantial risks of exclusion. These social risks will be mitigated by specialized stakeholder engagement activities, including (a) holding consultations with civil society and, especially, marginalized groups; (b) developing grievance redress mechanisms (GRM); and (c) tailoring outreach and communications strategies. In addition, project development indicators include stakeholder engagement indicators -- which covers citizens and non-citizens -- and will be monitored and evaluated as part of the project results framework.

Indeed, to assure inclusion of marginalized groups, the program is benefiting from the support of “RSR12 Engaging Marginalized Groups in the Design of Identification Systems in Africa” to identify the key marginalized groups in each country, and design and implement consultations and other stakeholder engagement activities to ensure their needs are catered for under the project and that they do not suffer exclusion as a result.

Privacy and data protection risks are not relatively high in phase 1 countries. Côte d’Ivoire and Guinea have robust privacy and data protection laws, though execution could be bolstered. Further, the nature of the foundational ID system minimizes privacy concerns: government-recognized IDs issued by the system merely verify the identity of the bearer, without entitling the bearer to the right to undertake any function or activity (e.g., driving, traveling). Lastly, the very minimal set of information collected (e.g., full name, date of birth, gender, biometrics), and the fact that the assigned UNI will be kept private, minimizes risks.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:



3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

Targeted efforts will be taken to break patterns of exclusion and discrimination, especially for the historically marginalized. The government-recognized ID will be issued free-of-charge, ensuring inclusion of the poorest. Further, special attention will be given to ensuring that accessible, culturally-sensitive techniques are used at all stages of the ID life cycle, with such efforts supported by strong collaboration with national human right bodies, local CSOs and international agencies (UNICEF, UNHCR, IOM). Further, risks of exclusion will be managed through (i) training registration teams, at all levels, in nondiscrimination, cultural awareness and sensitivity; (ii) public campaigns to inform users of their rights; (iii) development of a nondiscrimination policy by the relevant ID agency (ONI/PMO); (iv) development of strong grievance mechanisms integrated with the foundational ID systems; and (v) hiring of locals to help with uptake and any cultural adaptations needed. Further, stakeholder engagement indicators (aiming at effective benefits delivery through transparency and accountability, participation, grievance redress, monitoring and mitigation of project risks) are included as part of the Results Framework (RF) and Monitoring & Evaluation (M&E).

As already noted, the project structurally limits data protection and privacy concerns that the collected information might result in either discrimination or targeted persecution. First, minimal, limited data will be collected (biometrics, name, date of birth, gender, etc.), without any socioeconomic or demographic data. Second, the assigned UNI will be random and unintelligible, meaning that no associative information might be inferred. Third, Component 1 of the project aims to develop robust legal and institutional controls guarding against abuse. Finally, a communication campaign launched at both the national and regional levels will highlight both key project benefits for users, as well as user rights, including of grievance redress mechanisms (GRM).

In addition, the project is supported by the “RSR12 Engaging Marginalized Groups in the Design of Identification Systems in Africa”, which will focus specifically on the needs and perspectives of marginalized groups. The RSR is a World Bank-executed activity as part of its due diligence to help avoid and minimize adverse impacts. It specifically includes targeted research, formal and informal consultations with key groups (see below for more details on the consultations supported), and technical assistance to the Borrowers. This will include a preliminary social risk analysis completed by the World Bank.

The RSR will focus on marginalized groups in each country, helping to close the feedback loop between relevant stakeholders, both citizens and non-citizens, and governments. Outreach strategies will incorporate tailored measures to target obstacles (e.g., logistical, costs and fees, distance). In order to ensure inclusion of hard-to-reach populations — including the elderly, women, persons with disabilities, the illiterate and those living in isolated communities — targeted enrollment techniques, such as home-based registration and mobile registration units, will be employed. Targeted research with key hard-to-reach groups and focus group discussions, roundtables and consultations with civil society and members of these marginalized groups will be conducted in Côte d’Ivoire and Guinea. With support from the RSR and the Gates Foundation, ethnographic research in Côte d’Ivoire will help better understand user issues, including barriers, data sharing, usage concerns, reservations in uptake and experiences with previous identification efforts.

The research and proposed mitigation measures outlined above will inform national-level Social Assessments (SA) with accompanying Social Management Plans that will be prepared by the Borrowers during implementation to inform the design of the foundational ID systems under Component 2 and will provide a roadmap for the overall implementation of the project.



4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The Borrowers have agreed to engage in consultations and other CE activities with beneficiaries and, particularly marginalized groups, as part of project preparation. The Borrowers will receive technical support from the team to implement consultations and stakeholder engagement activities.

Specifically, the Bank and Borrowers will be carrying out a series of roundtables and consultations with civil society and marginalized groups, targeted research with key hard-to-reach groups, as well as ethnographic research on barriers people face in accessing and using IDs such as women, youth, elderly, persons with disabilities, and refugees, forcibly displaced and stateless persons, and other vulnerable groups. Additional key groups have been identified based on the country context. The feedback collected through these channels will inform the development of a Social Assessment and a Social Management Plan to inform implementation of the project. These consultations and the mechanisms developed thereafter will build governments' capacity for effective engagement of, and feedback from beneficiaries of the foundational ID systems.

The Borrowers have limited capacity in stakeholder engagement and grievance redress. To address this, the Borrowers will recruit and appoint at least one senior social development specialist with experience in grievance redress mechanisms and consultations that will be retained throughout project implementation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Throughout preparation and implementation, the Program will employ a variety of methods for engaging beneficiaries who may be impacted by the foundational ID systems, and in closing the feedback loop between beneficiaries and governments on project implementation. This approach will be reflected in national-level Stakeholder Engagement Plans. Stakeholder engagement in this operation aims to facilitate effective delivery of Program benefits by promoting transparency and accountability, participation, grievance redress, regular monitoring to improve operational performance, and risk mitigation.

Consideration for marginalized groups will be a focus of stakeholder engagement activities to mitigate any negative social impacts. Key groups will include orphans and vulnerable children (OVC), women, elderly persons, persons with disabilities, persons belonging to religious, ethnic and other minorities, migrants, refugees, asylum seekers, internally displaced persons, border populations, non-citizens, and stateless persons.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure



C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

No

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

No

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

No

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

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