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Report No: PAD3556

INTERNATIONAL DEVELOPMENT ASSOCIATION

PROJECT APPRAISAL DOCUMENT

ON

PROPOSED CREDITS

IN THE AMOUNT OF EUR 165.7 MILLION
(US$182 MILLION EQUIVALENT)

AND PROPOSED GRANTS
IN THE AMOUNT OF SDR 66.5 MILLION
(US$91 MILLION EQUIVALENT)

TO

TOGOLESE REPUBLIC
REPUBLIC OF BENIN
BURKINA FASO
AND
REPUBLIC OF NIGER

FOR THE

WEST AFRICA UNIQUE IDENTIFICATION FOR REGIONAL INTEGRATION AND INCLUSION (WURI) PROGRAM PHASE 2

USING THE MULTIPHASE PROGRAMMATIC APPROACH
APPROVED BY THE BOARD ON JUNE 5, 2018 FOR US$317.1 MILLION EQUIVALENT
AND REVISED FOR US$395.1 MILLION EQUIVALENT
ON
APRIL 10, 2020

Social Protection and Jobs Global Practice
Africa Region

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CURRENCY EQUIVALENTS

(Exchange Rate Effective February 29, 2020)

Currency Unit =	SDR, EUR
SDR 0.73 =	US$1
EUR 0.91 =	US$1

FISCAL YEAR 2020
January 1 – December 31

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ABBREVIATIONS & ACRONYMS

API	Application Programming Interface
AWP&B	Annual Work Plan and Budget
CFAF	*Communauté financière d'Afrique* [“Financial Community of Africa”] *franc*
CPF	Country Partnership Framework
CR	Civil Registry
DA	Designated Account
DFIL	Disbursement and Financial Information Letter
ECOWAS	Economic Community of West African States
eIDAS	Electronic Identification and Trust Services Ecosystem (European Union)
eKYC	Electronic Know-Your-Customer
ESAMP	Environmental and Social Assessment and Management Plan
EU	European Union
FCS	Fragile and Conflict-affected Situations
FM	Financial Management
*f*ID	Foundational Identification/Identity
FY	Fiscal Year
GDPR	General Data Protection Regulation (European Union)
GRM	Grievance Redress Mechanism
HCD	Human-Centered Design
ICT	Information and Communication Technology
ID4D	Identification for Development
IDA	International Development Association
IDP	Internally Displaced Persons
IFR	Interim Financial Report
IPF	Investment Project Financing
KYC	Know Your Customer
LMP	Labor Management Plan
LoA	Level of Assurance
M&E	Monitoring and Evaluation
MPA	Multiphase Programmatic Approach
PDO	Project Development Objective
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PMO	Office of the Prime Minister
PPSD	Project Procurement Strategy for Development
PrDO	Program Development Objective
SEP	Stakeholder Engagement Plan
SDR	Special Drawing Rights
SIM	Subscriber Identity Module
UNI	Unique Identity Number
WAEMU	West African Economic and Monetary Union

GLOSSARY

For ease of reference, and in order to facilitate comprehension of this document, the following terms are defined in this glossary:

Authentication	Process of establishing confidence that a person is who they claim to be. Digital authentication generally involves a person electronically presenting one or more "authentication factors" to "assert" their identity—that is, to prove that they are the same person to whom the identity or credential was originally issued.[1]
Authentication factor	Element used in confirming an individual's identity, of which there are five types: (i) knowledge factors (*i.e.*, something you "know"), (ii) possession factors (*i.e.*, something you "have"); (iii) inherence factors (*i.e.*, something you "are"), (iv) locations factors (*i.e.*, where you are) and (v) behavioral factors (*i.e.*, what you "do"). Multi-factor authentication applies when two or more factors (often of different types) are used to authenticate, with two-factor authentication being increasingly common.[1]
Biometrics, or biometric data	Physiological or behavioral characteristics that are unique to an individual (*e.g.*, fingerprints, voice patterns) and which can be used as a means of automatic verification of identity.[1]
Biometric identification	Process of searching against a biometric enrollment database to find and return the biometric reference identifier(s) attributable to a single individual.[2] The comparison may be either a one-to-one (1:1) matching—commonly referred to as "biometric verification"—where comparison is done against a single template, or one-to-many (1:N) matching, where comparison is done against multiple templates.[3]
Civil registration (CR) system (or "Civil Registry")	Foundational system for establishing a person's existence, the CR system is the continuous, permanent, compulsory, and universal recording of the occurrence and characteristics of vital events (*e.g.*, live births, deaths, fetal deaths, marriages and divorces) and other civil status events pertaining to the population as provided by decree, law or regulation, in accordance with the legal requirements in each country.[4]
Deduplication (or "single instancing")	Process of eliminating duplicate or redundant information; in the case of an individual's identity, that process applies to removing duplicate identities of a single individual in order to establish uniqueness in the system.[5]
Digital identity	Unique representation of an individual engaged in an online transaction, a digital identity is always unique in the context of a particular digital service but does not necessarily uniquely identify that individual in other contexts; as such, accessing a digital service may not mean that the individual's real-life identity is known.[1]

[1] World Bank. 2019. *ID4D Practitioner's Guide*. Version 1.0. Washington, DC: World Bank. *http://documents.worldbank.org/curated/en/248371559325561562/pdf/ID4D-Practitioner-s-Guide.pdf.*
[2] ISO. 2017. International Standard ISO/IEC 2382-37. Information technology – Vocabulary – Part 37: Biometrics. *https://www.iso.org/standard/66693.html.*
[3] Jain, Anil; Ross, Arun; and Nandakumar, Karthik. 2011. *Introduction to Biometrics*. New York: Springer Publishing Co.
[4] United Nations. 2014. Department of Economic and Social Affairs, United Nations Statistics Division ."Principles and Recommendations for a Vital Statistics System - Revision 3". Series M No. 19/Rev.3. New York: United Nations. *https://unstats.un.org/unsd/demographic/standmeth/principles/M19Rev3en.pdf*.
[5] Kumar, B. Sateesh; Rani, V. Uma; and Raj, T. Akshay. 2016. "A Survey on Distributed Deduplication System for Improved Reliability and Security". International Research Journal of Engineering and Technology. *https://www.irjet.net/archives/V3/i8/IRJET-V3I8104.pdf*.

Foundational identification (*f*ID) system	Foundational system for proving (or "authenticating") an individual's unique identity, the *f*ID system uses a minimal set of attributes, such as biographic and biometric data, to exclusively describe an individual, and, on that basis, to provide government-recognized identity (*f*ID) credentials. The *f*ID system is "foundational"[6] relative to various, functional systems and databases (*e.g.*, education, health, telecommunications), on which they rely, but it is a parallel and complementary component (along with, for instance, the CR system) of the larger *f*ID ecosystem. The *f*ID system is understood to be inclusive of all persons in the territory of a country, irrespective of nationality, citizenship or legal status; it should be free and frictionless, meaning that it is a free-to-end-user model, where service providers reach service users without transaction costs to them.[8]
Functional identity credential	Identity credential issued by an entity in order to identify individuals for accessing or allowing them to perform a particular service or transaction (*e.g.*, driver's licenses, voter cards, health and insurance records, bank cards). These may be commonly accepted for broader identification purposes.[7]
*f*ID credential, or government-recognized identity credential	References to "*f*ID credentials" or to "government-recognized identity credentials" are exclusively with regard to identity credentials[8] issued by the *f*ID system, and which are understood as being an official form of unique identity that are not necessarily linked to nationality, citizenship or legal status, and which are recognized by the state as proof-of-identity that can be used as the basis for accessing a variety of public and private services.[1,9]
*f*ID System Authority	For the purposes of this document, the institutional authority that implements and manages the country's *f*ID system; ideally, that Authority is an independent and autonomous entity, dedicated to identification and authentication services, capable of operating transversally across sectors, and benefiting from structural checks-and-balances to safeguard against system and data abuse.
Identification	Action or process of identifying a person (*cf*. "authentication").[1] In its initial occurrence, it typically involves the assignation of an identity number (which is often unique) and the issuance of an identity credential, which, alone or with the support of some other authentication factor (*e.g.*, biometrics), is subsequently used to prove or authenticate a person's identity.
Identity	Attribute, or set of attributes, that uniquely describe(s) a subject within a given context.[1]
Identity assurance	Ability to determine, with a degree of certainty—or level of assurance (LoA)—that a claim to a particular identity made by some person or entity can be trusted to be actually be the claimant's "true" identity.[9]
Identity proofing	Process of establishing that a subject is who they claim to be.[1]
Interoperability	Ability to share information and knowledge between organizations, through the business processes they support, by means of the exchange of data between their information and

[6] The *f*ID system is part of the "*f*ID ecosystem", which is a collection of systems that establishes the legal identity of individuals, principally by (i) establishing the individual's legal existence and (ii) creating a means for that individual to prove, or authenticate, their identity. There is no single blueprint for either institutional or operational arrangements, nor for how foundational systems interrelate. *See* PAD2480.
[7] World Bank Group, GSMA & Secure Identity Alliance. 2016. *Digital Identity: Towards Shared Principles for Public and Private Sector Cooperation.* Discussion Paper. Washington, DC: World Bank Group. *https://secureidentityalliance.org/public-resources/4-july-2016-report-digital-identity/file*.
[8] An "identity credential" is a mechanism, process, device or document that vouches for the identity of a person through some method of trust and authentication (*e.g.*, NID cards, certificates, numbers, passwords or SIM cards), while an "identity document" is any document that includes, references or substantiates identity-information, as opposed to vouching for a person's identity (*e.g.*, apartment lease, utility bill). *See* Grassi, Garcia and Fenton, 2017.
[9] European Union. 2017. New European Interoperability Framework. *https://ec.europa.eu/isa2/sites/isa/files/eif_brochure_final.pdf*.

	Communication Technology (ICT) systems.[10]
National identity (NID) card	Government-recognized form of an individual's identity issued by the state to its nationals or citizens, or to other individuals having a certain legal status recognized by the state (*e.g.*, residents), and which can often be used as the basis for accessing a variety of public and private services.[8]
National population registry	Mechanism of continuous recording, and/or of coordinated linkage, of selected information pertaining to each member of the resident population of a country in such a way to provide the possibility of determining up-to-date information concerning the size and characteristics of that population at selected time intervals.[10]
Personal data	Any information relating to an individual who can be identified, directly or indirectly, in particular by reference to an identifier (*e.g.*, name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual).[11]
Physical presence	Place where a person is actually, physically located, regardless of duration therein or of legal status. In this document, "physical presence" is used as the basis for inclusion in the *f*ID system.[8]
Social registry	Information systems that support outreach, intake, registration and determination of potential eligibility for one or more social programs.[2]
Trust framework	Within the context of multi-party identity systems, the generic name for the set of system rules governing the collection, verification, storage exchange, authentication, and reliance on identity information that, collectively, allows participating entities to trust each other (*e.g.*, Visa operating rules, the EU's eIDAS). The term is synonymous with terms such as "system rules", "scheme rules", "operating regulations" or "common operating rules".[12]
Unique identity number (UNI)	Identification number that is unique to that individual; international good practice is that the number should be unintelligible, randomly-assigned and issued at birth.[8]
Vulnerable groups	Individuals or groups who, by virtue of, *inter alia*, their age, gender, income, ethnicity, language, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages, engagement in informal or illegal activities, or location in remote or isolated areas, may be less likely to benefit from the project or participate fully in the mainstream consultation process.[8]

[10] United Nations Statistics Division. 1969. *Methodology and Evaluation of Population Registers and Similar Systems*. New York: United Nations. *https://unstats.un.org/unsd/publication/SeriesF/Seriesf_15e.pdf*.
[11] European Commission. Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance). *https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679.*
[12] Makaay, Esther; Smedinghoff, Tom; and Thibeau, Don. 2017. "Trust Frameworks for Identity Systems". Open Exchange. *http://www.openidentityexchange.org/wp-content/uploads/2017/06/OIX-White-Paper_Trust-Frameworks-for-Identity-Systems_Final.pdf*.

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1. DATASHEET

BASIC INFORMATION

Country(ies)	Project Name
Burkina Faso, Benin, Niger, Togo	West Africa Unique Identification for Regional Integration and Inclusion - Phase 2

Project ID	Financing Instrument	Environmental and Social Risk Classification
P169594	Investment Project Financing	Substantial

Financing & Implementation Modalities

[✓] Multiphase Programmatic Approach (MPA)	[ ] Contingent Emergency Response Component (CERC)
[ ] Series of Projects (SOP)	[✓] Fragile State(s)
[ ] Disbursement-linked Indicators (DLIs)	[ ] Small State(s)
[ ] Financial Intermediaries (FI)	[✓] Fragile within a non-fragile Country
[ ] Project-Based Guarantee	[✓] Conflict
[ ] Deferred Drawdown	[ ] Responding to Natural or Man-made Disaster
[✓] Alternate Procurement Arrangements (APA)	[✓] Hands-on Enhanced Implementation Support (HEIS)

Expected Project Approval Date	Expected Project Closing Date	Expected Program Closing Date
23-Apr-2020	30-Jul-2026	03-Jul-2028

Bank/IFC Collaboration

No

MPA Program Development Objective

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

MPA Financing Data (US$, Millions)

MPA Program Financing Envelope	395.10
with an additional request to IDA	78.00

Proposed Project Development Objective(s)

Increase the number of persons in the Togolese Republic, Republic of Benin, Burkina Faso and Republic of Niger, who have government-recognized proof of unique identity that facilitates their access to services.

Components

Component Name	Cost (US$, millions)
Strengthening the Legal and Institutional Framework	42.50
Establishing Robust and Inclusive fID Systems	174.50
Facilitating Access to Services Through fID Credentials	56.00

Organizations

Borrower:	Togolese Republic Republic of Benin Republic of Niger Burkina Faso
Implementing Agency:	NE: Presidency TG: Ministère des Postes, de l'Economie Numérique et des Innovations BF: Primature BJ: Agence Nationale d'Identification des Personnes (ANIP)

MPA FINANCING DETAILS (US$, Millions)

Board Approved MPA Financing Envelope:	317.10
MPA Program Financing Envelope:	395.10
of which Bank Financing (IBRD):	0.00
of which Bank Financing (IDA):	395.10
of which other financing sources:	0.00

PROJECT FINANCING DATA (US$, Millions)

SUMMARY

Total Project Cost	273.00
Total Financing	273.00
of which IBRD/IDA	273.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Development Association (IDA)	273.00
IDA Credit	182.00
IDA Grant	91.00

IDA Resources (in US$, Millions)

	Credit Amount	Grant Amount	Guarantee Amount	Total Amount
Burkina Faso	50.00	25.00	0.00	75.00
National PBA	25.00	0.00	0.00	25.00
Regional	25.00	25.00	0.00	50.00
Benin	30.00	15.00	0.00	45.00
National PBA	15.00	0.00	0.00	15.00
Regional	15.00	15.00	0.00	30.00
Niger	54.00	27.00	0.00	81.00
National PBA	27.00	0.00	0.00	27.00
Regional	27.00	27.00	0.00	54.00
Togo	48.00	24.00	0.00	72.00
National PBA	24.00	0.00	0.00	24.00
Regional	24.00	24.00	0.00	48.00
Total	**182.00**	**91.00**	**0.00**	**273.00**

Expected Disbursements (in US$, Millions)

WB Fiscal Year	2020	2021	2022	2023	2024	2025	2026
Annual	2.73	13.65	40.95	54.60	54.60	54.60	51.87
Cumulative	2.73	16.38	57.33	111.93	166.53	221.13	273.00

INSTITUTIONAL DATA

Practice Area (Lead)

Social Protection & Jobs

Contributing Practice Areas

Digital Development, Finance, Competitiveness and Innovation, Governance, Health, Nutrition & Population

Climate Change and Disaster Screening

This operation has been screened for short and long-term climate change and disaster risks

SYSTEMATIC OPERATIONS RISK-RATING TOOL (SORT)

Risk Category	Rating
1. Political and Governance	High
2. Macroeconomic	Moderate
3. Sector Strategies and Policies	High
4. Technical Design of Project or Program	High
5. Institutional Capacity for Implementation and Sustainability	High
6. Fiduciary	Substantial
7. Environment and Social	Substantial
8. Stakeholders	High
9. Other	High
10. Overall	High
Overall MPA Program Risk	High

COMPLIANCE

Policy

Does the project depart from the CPF in content or in other significant respects?

[ ] Yes [✓] No

Does the project require any waivers of Bank policies?

[ ] Yes [✓] No

Environmental and Social Standards Relevance Given its Context at the Time of Appraisal

E & S Standards	Relevance
Assessment and Management of Environmental and Social Risks and Impacts	Relevant
Stakeholder Engagement and Information Disclosure	Relevant
Labor and Working Conditions	Relevant
Resource Efficiency and Pollution Prevention and Management	Not Currently Relevant
Community Health and Safety	Not Currently Relevant
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Currently Relevant
Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Currently Relevant
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Currently Relevant
Cultural Heritage	Not Currently Relevant
Financial Intermediaries	Not Currently Relevant

NOTE: For further information regarding the World Bank's due diligence assessment of the Project's potential environmental and social risks and impacts, please refer to the Project's Appraisal Environmental and Social Review Summary (ESRS).

Legal Covenants

Sections and Description

1. TG:

Shall identify in its Presidency a Focal Point to work with the Project Coordinator all throughout Project implementation, serving under terms of reference and with qualifications and experienced satisfactory to the Association, and who shall: (i) be responsible for assuring the transversality of the Project; (ii) participate in the Steering Committee with non-voting faculties; and (iii) be a member of the Technical Committee.
Shall, pursuant to Section I.A.2.a of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a cross-cutting Steering Committee to address Project coordination challenges through a whole-of-government approach, in particular to guide the course of the Project and to draw together necessary competencies and resolve any issues that might arise related to the management and implementation of the fID system at both the central and local level; and shall, pursuant to Section I.A.3 of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a Technical Committee vested with the responsibility of providing to the PIU key technical and operational inputs necessary for the fID System in order to facilitate Project implementation.

Sections and Description

2. TG:
Shall, pursuant to Section I.A.4 of Schedule 2 of the Financing Agreement, maintain within the structure of the MPENIT and throughout Project implementation, the Project Implementation Unit headed by the Project Coordinator and comprising a technical team with expertise on all relevant disciplines, including a dedicated financial management specialist and a procurement specialist, all satisfactory to the Association and under terms of reference and with resources adequate for its mandate; and shall, pursuant to Section I.A.4 of Schedule 2 of the Financing Agreement: not later than: (i) one (1) month after the Effective Date, recruit and appoint a Project Coordinator, a technical architect, and a senior environmental and social development specialist with experience in grievance redress mechanisms and consultations; (ii) three (3) months after the Effective Date, recruit and appoint a monitoring and evaluation specialist, and an assistant trained in grievance redress mechanisms; and (iii) six (6) months after the Effective Date, recruit and appoint a communications specialist and an accountant to be exclusively dedicated to the Project, all in a manner satisfactory to the Association.

Sections and Description

3. TG:
Shall pursuant to Section I.F of Schedule 2 of the Financing Agreement, (i) not later than three (3) months after the Effective Date, configure and thereafter maintain in the PIU an accounting software suitable to meet the requirements of the Project, train its staff on the use of said software, and recruit and appoint to the PIU an internal auditor; and (ii) not later than six (6) months after the Effective Date, recruit and appoint to the PIU an external auditor, both of said auditors under terms of reference and with qualifications and experience satisfactory to the Association, to oversee the accounting functions of the PIU.

Sections and Description

4. TG:

Shall, pursuant to Section I.D of Schedule 2 of the Financing Agreement, not later than one (1) month after the Effective Date, adopt the Project Implementation Manual, which shall include a financial manual of procedures setting forth the internal control procedures, in form and substance satisfactory to the Association; and (ii) thereafter, take all action required to carry out the Project in accordance with the provisions and requirements set forth or referred to in the Project Implementation Manual; (iii) submit recommendations to the Association for its consideration for changes and updates of the Project Implementation Manual as they may become necessary or advisable during Project implementation in order to achieve the objective the Project; and (iv) not assign, amend, abrogate or waive the Project Implementation Manual or any of its provisions without the Association's prior agreement.

Sections and Description

5. TG:

Shall, pursuant to Section I.B.5 of Schedule 2 of the Financing Agreement, (i) not later than five (5) months after the Effective Date, submit to the Association for its review and approval, the draft Environmental and Social Assessment and Management Plan; (ii) thereafter, finalize the Environmental and Social Assessment and Management Plan taking into consideration the recommendations of the Association; and (iii) not later than six (6) months after the Effective Date, disclose in the Recipient's and the Association's websites the final Environmental and Social Assessment and Management Plan as approved by the Association; and shall, pursuant to Section I.B.4 of Schedule 2 of the Financing Agreement: (i) not later than six (6) months of the Effective Date, establish, and thereafter maintain and publicize throughout the period of implementation of the Project, the availability of a grievance redress mechanism in form and substance satisfactory to the Association, to hear and determine fairly and in good faith all complaints raised in relation to the Project, and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Association.

Sections and Description

6. TG:

Shall, pursuant to Section I.B.3.a of Schedule 2 of the Financing Agreement, take all measures necessary on its part to collect, compile, and furnish to the Association through regular reports, with the frequency specified in the ESCP, and promptly in a separate report or reports, if so requested by the Association, information on the status of compliance with the ESCP and the management tools and instruments referred to therein, all such reports in form and substance acceptable to the Association, setting out, inter alia: (i) the status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions; and, pursuant to Section I.B.3.b of Schedule 2 of the Financing Agreement, promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including without limitation, the denial of fID System registration or the denial of the provision of a fID Credential to the registrant, the denial of services for lack of possession of a fID

Credentials, violations and/or abuses of established data protection and privacy norms (such as the use of the fID System for discriminatory purposes or surveillance), violence by registration personnel (especially towards vulnerable groups and gender-based violence), all in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards.

Sections and Description

7. TG:

Shall, pursuant to Section II.B of Schedule 2 of the Financing Agreement, not later than six (6) months after the Effective Date, appoint an independent third party, under terms of reference and with qualifications and experience satisfactory to the Association, to carry out the oversight of the use of the identification systems being designed and implemented under the Project.

Sections and Description

1. BJ:

Shall identify in its Presidency a Focal Point to work with the Project Coordinator all throughout Project implementation, serving under terms of reference and with qualifications and experienced satisfactory to the Association, and who shall: (i) be responsible for assuring the transversality of the Project; (ii) participate in the Steering Committee with non-voting faculties; and (iii) be a member of the Technical Committee.

Shall, pursuant to Section I.A.2.a of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a cross-cutting Steering Committee to address Project coordination challenges through a whole-of-government approach, in particular to guide the course of the Project and to draw together necessary competencies and resolve any issues that might arise related to the management and implementation of the fID system at both the central and local level; and shall, pursuant to Section I.A.3 of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a Technical Committee vested with the responsibility of providing to the PIU key technical and operational inputs necessary for the fID System in order to facilitate Project implementation.

Sections and Description

2. BJ:

ANIP shall, pursuant to Section I.A.1 of the Schedule of the ANIP Project Agreement, establish, not later than one (1) month after the Effective Date, and thereafter maintain, within its structure and throughout Project implementation, the Project Implementation Unit to be headed by the Project Coordinator and comprising a technical team with expertise on all relevant disciplines, all satisfactory to the Association and under terms of reference and with resources adequate for its mandate. To that end, ANIP shall not later than: (i) one (1) month after the Effective Date, recruit and appoint a Project Coordinator, a technical architect, and a senior environmental and social development specialist with experience in grievance redress mechanisms and consultations; (ii) three (3)

months after the Effective Date, recruit and appoint a financial management specialist, a procurement specialist, an accountant, a monitoring and evaluation specialist, and an assistant trained in grievance redress mechanisms; and (iii) six (6) months after the Effective Date, recruit and appoint a communications specialist, all in a manner satisfactory to the Association.

Sections and Description

3. BJ:

ANIP shall pursuant to Section I.G of the Schedule of the ANIP Project Agreement, ensure that the PIU: (i) not later than three (3) months after the Effective Date, acquire, install and thereafter maintain in the PIU an accounting software suitable to meet the requirements of the Project and train its staff on the use of said software; and (ii) recruit and appoint to the PIU, not later than six (6) months after the Effective Date, an internal auditor and an external auditor, both of them under terms of reference and with qualifications and experience satisfactory to the Association, to oversee the accounting functions of the PIU.

Sections and Description

4. BJ:

ANIP shall, pursuant to Section I.D of the Schedule of the ANIP Project Agreement, (i) not later than three (3) months after the Effective Date, adopt the Project Implementation Manual, which shall include a financial manual of procedures setting forth the internal control procedures, in form and substance satisfactory to the Association; and (ii) thereafter, take all action required to carry out the Project in accordance with the provisions and requirements set forth or referred to in the Project Implementation Manual; (iii) submit recommendations to the Association for its consideration for changes and updates of the Project Implementation Manual as they may become necessary or advisable during Project implementation in order to achieve the objective the Project; and (iv) not assign, amend, abrogate or waive the Project Implementation Manual or any of its provisions without the Association’s prior agreement.

Sections and Description

5. BJ:

ANIP shall, pursuant to Section I.C.5 of the Schedule of the ANIP Project Agreement, (i) not later than five (5) months after the Effective Date, to submit to the Association for its review and approval, the draft Environmental and Social Assessment and Management Plan; and (ii) thereafter, finalize the Environmental and Social Assessment and Management Plan taking into consideration the recommendations of the Association; and shall, pursuant to Section I.C.4 of the Schedule of the ANIP Project Agreement: not later than six (6) months after the Effective Date, and thereafter, maintain and publicize, throughout the implementation of the Project, the availability of a grievance redress mechanism, in form and substance satisfactory to the Association, to hear and determine fairly and in good faith all complaints raised in relation to the Project, and shall take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Association.

Sections and Description

6. BJ:
ANIP shall, pursuant to Section I.C.3 of the Schedule of the ANIP Project Agreement, (a) take all measures necessary to collect, compile, and furnish to the Association through regular reports, with the frequency specified in the ESCP, and promptly in a separate report or reports, if so requested by the Association, information on the status of compliance with the ESCP and the management tools and instruments referred to therein, all such reports in form and substance acceptable to the Association, setting out, inter alia: (i) the status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions; and, (b) promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including without limitation, the denial of fID System registration or the denial of the provision of a fID Credential to the registrant, the denial of services for lack of possession of a fID Credentials, violations and/or abuses of established data protection and privacy norms (such as the use of the fID System for discriminatory purposes or surveillance), violence by registration personnel (especially towards vulnerable groups and gender-based violence), all in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards.

Sections and Description

7. BJ:
Shall, pursuant to Section II.B of Schedule 2 of the Financing Agreement, not later than six (6) months after the Effective Date, appoint an independent third party, under terms of reference and with qualifications and experience satisfactory to the Association, to carry out the oversight of the use of the identification systems being designed and implemented under the Project.

Sections and Description

1. BF:
Shall identify in its Office of the Prime Minister a Focal Point (responsible for the budget program to which the Project is attached) to work with the Project Coordinator all throughout Project implementation, serving under terms of reference and with qualifications and experienced satisfactory to the Association, and who shall: (i) be responsible for assuring the transversality of the Project; (ii) participate in the Steering Committee with voting rights; and (iii) be a member of the Technical Committee.
Shall, pursuant to Section I.A.2.a of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a cross-cutting Steering Committee to address Project coordination challenges through a whole-of-government approach, in particular to guide the course of the Project and to draw together necessary competencies and resolve any issues that might arise related to the management and implementation of the fID system at both the central and local level; and shall, pursuant to Section I.A.3 of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a Technical

Committee vested with the responsibility of providing to the PIU key technical and operational inputs necessary for the fID System in order to facilitate Project implementation.

Sections and Description

2. BF:

Shall, pursuant to Section I.A.4 of Schedule 2 of the Financing Agreement, through its Office of the Prime Minister, establish, not later than one (1) month after the Effective Date, and thereafter maintain, within its structure and throughout Project implementation, the Project Implementation Unit to be headed by the Project Coordinator and comprising a technical team with expertise on all relevant disciplines, all satisfactory to the Association and under terms of reference and with resources adequate for its mandate; and shall, pursuant to Section I.A.4 of Schedule 2 of the Financing Agreement: not later than: (i) one (1) month after the Effective Date, recruit or appoint a Project Coordinator, a technical architect, and a senior environmental and social development specialist with experience in grievance redress mechanisms and consultations; (ii) three (3) months after the Effective Date, recruit or appoint a financial management specialist, a procurement specialist, an accountant, a monitoring and evaluation specialist, and an assistant trained in grievance redress mechanisms; and (iii) six (6) months after the Effective Date, recruit or appoint, a communications specialist, all in a manner satisfactory to the Association.

Sections and Description

3. BF:

Shall, pursuant to Section I.F of Schedule 2 of the Financing Agreement, ensure that the PIU: (i) not later than three (3) months after the Effective Date, acquire, install and thereafter maintain in the PIU an accounting software suitable to meet the requirements of the Project and train its staff on the use of said software; and (ii) recruit and appoint to the PIU, not later than six (6) months after the Effective Date, an internal auditor and an external auditor, both of them under terms of reference and with qualifications and experience satisfactory to the Association, to oversee the accounting functions of the PIU.

Sections and Description

4. BF:

Shall, pursuant to Section I.D of Schedule 2 of the Financing Agreement, (i) not later than three (3) months after the Effective Date, adopt the Project Implementation Manual, which shall include a financial manual of procedures setting forth the internal control procedures, in form and substance satisfactory to the Association; and (ii) thereafter, take all action required to carry out the Project in accordance with the provisions and requirements set forth or referred to in the Project Implementation Manual; (iii) submit recommendations to the Association for its consideration for changes and updates of the Project Implementation Manual as they may become necessary or advisable during Project implementation in order to achieve the objective the Project; and (iv) not assign, amend, abrogate or waive the Project Implementation Manual or any of its provisions without the Association’s prior agreement.

Sections and Description

5. BF:
Shall, pursuant to Section I.B.5 of Schedule 2 of the Financing Agreement,: (i) not later than five (5) months after the Effective Date, submit to the Association for its review and approval, the draft Environmental and Social Assessment and Management Plan; (ii) thereafter, finalize the Environmental and Social Assessment and Management Plan taking into consideration the recommendations of the Association; and (iii) not later than six (6) months after the Effective Date, disclose in the Recipient's and the Association's websites the final Environmental and Social Assessment and Management Plan as approved by the Association; and, pursuant to Section I.B.4 of Schedule 2 of the Financing Agreement, shall, not later than six (6) months after the Effective Date, establish, and thereafter, maintain and publicize throughout the implementation of the Project, the availability of a grievance redress mechanism, in form and substance satisfactory to the Association, to hear and determine fairly and in good faith all complaints raised in relation to the Project, and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Association.

Sections and Description

6. BF:
Shall, pursuant to Section I.B.3.a of Schedule 2 of the Financing Agreement, (a) take all measures necessary on its part to collect, compile, and furnish to the Association through regular reports, with the frequency specified in the ESCP, and promptly in a separate report or reports, if so requested by the Association, information on the status of compliance with the ESCP and the management tools and instruments referred to therein, all such reports in form and substance acceptable to the Association, setting out, inter alia: (i) the status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions; ; and, pursuant to Section I.B.3.b of Schedule 2 of the Financing Agreement, promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including without limitation, the denial of fID System registration or the denial of the provision of a fID Credential to the registrant, the denial of services for lack of possession of a fID Credentials, violations and/or abuses of established data protection and privacy norms (such as the use of the fID System for discriminatory purposes or surveillance), violence by registration personnel (especially towards vulnerable groups and gender-based violence), all in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards.

Sections and Description

7. BF:
Shall, pursuant to Section II.B of Schedule 2 of the Financing Agreement, not later than six (6) months after the Effective Date, appoint an independent third party, under terms of reference and with qualifications and experience satisfactory to the Association, to carry out the oversight of the use of the identification systems being designed and implemented under the Project.

Sections and Description

1. NE:
Shall take all measures necessary to ensure that the ANSI: (i) acts through its Director General as the Focal Point, under terms of reference and with qualifications and experienced satisfactory to the Association; (ii) works with the Project Coordinator all throughout Project implementation; (iii) assures the transversality of the Project; (iv) participates in the Steering Committee; and (v) joins the Technical Committee as a member.
Shall, pursuant to Section I.A.2.a of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a cross-cutting Steering Committee to address Project coordination challenges through a whole-of-government approach, in particular to guide the course of the Project and to draw together necessary competencies and resolve any issues that might arise related to the management and implementation of the fID system at both the central and local level; and shall, pursuant to Section I.A.3 of Schedule 2 of the Financing Agreement, not later than three (3) months after the Effective Date, establish, under terms of reference and with qualified and experienced staff in adequate number, all satisfactory to the Association, and thereafter maintain throughout Project implementation, a Technical Committee vested with the responsibility of providing to the PIU key technical and operational inputs necessary for the fID System in order to facilitate Project implementation.

Sections and Description

2. NE:
The Recipient shall, pursuant to Section I.A.4 of Schedule 2 of the Financing Agreement, through the Office of the President of the Republic of Niger, establish, not later than one (1) month after the Effective Date, and thereafter maintain, within its structure and throughout Project implementation, the Project Implementation Unit to be headed by the Project Coordinator and comprising a technical team with expertise on all relevant disciplines, all satisfactory to the Association and under terms of reference and with resources adequate for its mandate. To that end, the Recipient shall not later than: (i) one (1) month after the Effective Date, recruit or appoint a Project Coordinator, a technical architect, and a senior environmental and social development specialist with experience in grievance redress mechanisms and consultations; (ii) three (3) months after the Effective Date, recruit or appoint a financial management specialist, a procurement specialist, an accountant, a monitoring and evaluation specialist, and an assistant trained in grievance redress mechanisms; and (iii) six (6) months after the Effective Date, recruit or appoint a communications specialist, all in a manner satisfactory to the Association.

Sections and Description

3. NE:
Shall, pursuant to Section I.F of Schedule 2 of the Financing Agreement, (i) not later than three (3) months after the Effective Date, acquire, install, configure and thereafter maintain in the PIU an accounting software suitable to meet the requirements of the Project and train its staff on the use of said software; and (ii) recruit and appoint to the PIU, not later than six (6) months after the Effective Date, an internal auditor and an external auditor, both of them under terms of reference and with qualifications and experience satisfactory to the Association, to oversee the accounting functions of the PIU.

Sections and Description

4. NE:

Shall, pursuant to Section I.D of Schedule 2 of the Financing Agreement, not later than three (3) months of the Effective Date, prepare and adopt a Project Implementation Manual (PIM), which shall include a financial manual of procedures setting forth the internal control procedures, in form and substance satisfactory to the Association; further, the Republic of Niger shall carry out the Project in accordance with the PIM, and shall not assign, amend, abrogate or waive the Project Implementation Manual or any of its provisions without the Association's prior agreement.

Sections and Description

5. NE:

Shall, pursuant to Section I.B.5 of Schedule 2 of the Financing Agreement, (i) not later than five (5) months after the Effective Date, submit to the Association for its review and approval, the draft Environmental and Social Assessment and Management Plan; (ii) thereafter, finalize the Environmental and Social Assessment and Management Plan taking into consideration the recommendations of the Association; and (iii) not later than six (6) months after the Effective Date, disclose in the Recipient's and the Association's websites the final Environmental and Social Assessment and Management Plan as approved by the Association; and shall, pursuant to Section I.B.4 of Schedule 2 of the Financing Agreement: (i) not later than six (6) months of the Effective Date, establish, and thereafter maintain and publicize throughout the period of implementation of the Project, the availability of a grievance redress mechanism in form and substance satisfactory to the Association, to hear and determine fairly and in good faith all complaints raised in relation to the Project, and take all measures necessary to implement the determinations made by such mechanism in a manner satisfactory to the Association.

Sections and Description

6. NE:

Shall, pursuant to Section I.B.3.a of Schedule 2 of the Financing Agreement, (a) take all measures necessary on its part to collect, compile, and furnish to the Association through regular reports, with the frequency specified in the ESCP, and promptly in a separate report or reports, if so requested by the Association, information on the status of compliance with the ESCP and the management tools and instruments referred to therein, all such reports in form and substance acceptable to the Association, setting out, inter alia: (i) the status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions; and, pursuant to Section I.B.3.b of Schedule 2 of the Financing Agreement, promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including without limitation, the denial of fID System registration or the denial of the provision of a fID Credential to the registrant, the denial of services for lack of possession of a fID Credentials, violations and/or abuses of established data protection and privacy norms (such as the use of the fID System for discriminatory purposes or surveillance), violence by registration personnel (especially towards

vulnerable groups and gender-based violence), all in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards.

Sections and Description

7. NE:

Shall, pursuant to Section II.B of Schedule 2 of the Financing Agreement, not later than six (6) months after the Effective Date, appoint an independent third party, under terms of reference and with qualifications and experience satisfactory to the Association, to carry out the oversight of the use of the identification systems being designed and implemented under the Project.

Conditions

I. PROGRAM CONTEXT

1. **This Project Appraisal Document (PAD) covers the second phase of the West Africa Unique Identification for Regional Integration and Inclusion (WURI[13]) program which uses the Multiphase Programmatic Approach (MPA, or Program)[14].** Details of financing for Phase 1 countries are in the first PAD[15]. The Program was approved by the World Bank's Board of Executive Directors on the June 5, 2018 (P161329) with an overall Program financing envelope of International Development Association (IDA) US$317.1 million.

A. MPA Program Context

2. **The WURI Program is designed in two phases: Phase 1 includes Côte d'Ivoire, Guinea and the Economic Community of West African States (ECOWAS) Commission; and Phase 2 includes Togo, Benin, Burkina Faso and Niger.** Togo requested to take part in WURI after the Board's approval of the overall Program, and therefore is a new borrower to join the operation. Togo's addition to the WURI operation, with a request for US$72 million IDA financing, is being processed and appraised as part of Phase 2. The total financing envelope for Phases 1 and 2 amounts to US$395.1 million.

3. **The Program was approved to facilitate access to services by financing the development of foundational identification (*f*ID) systems[16], which would allow all persons physically in the territory of a participating country, irrespective of, and without accounting for, nationality, legal status or residency, to receive a government-recognized unique identity credential.** *f*ID systems serve the sole purpose of uniquely identifying a person (typically through associating a person's minimal biographic data with their biometrics); they neither accord nor recognize a person's rights (*e.g.*, nationality, legal status). The *f*ID system is intended to provide assurance of a person's unique identity ("I am who I say I am"), and nothing more. Other services—social protection, health, education and finance, to name a few—may then rely on the *f*ID system to identify and to authenticate[17] individuals. These programs may apply targeting policies, determine eligibility and deliver social benefits and services to individuals and households. Furthermore, in the event of covariate shocks, such as the COVID-19 pandemic or climate-related events, *f*ID systems could facilitate rapid scaling up of programs to protect the poor and vulnerable.

4. **Phase 1 countries have learned—and shown—that the adoption of digital technologies for identification and service delivery is a complex endeavor.** Disruptive technologies are converging and changing the way people live, work and organize. On the one hand, this dynamism presents a unique opportunity to solve intractable development challenges. On the other hand, the adoption of these very technologies can exacerbate exclusion and marginalization, as well as diminish people's digital privacy and control over their data. Advancing identification for all persons, irrespective of nationality or legal status, in order to facilitate service delivery, is thus a high-risk, high-reward endeavor. When paired with cyberspace, the risks increase exponentially as the "virtual" space, though parallel to the "real" world, has potentially severe implications[18], particularly for the vulnerable. Higher level lessons learned on

[13] WURI, named after a West African counting game, is about "making everyone count".
[14] Operations Policy and Country Services. World Bank. 2017. Multiphase Programmatic Approach. Report. Washington, DC: World Bank Group. *https://hubs.worldbank.org/news/News%20Documents/MPA.pdf.*
[15] PAD2480. World Bank. 2018. *Côte d'Ivoire, Guinea and ECOWAS Commission - West Africa Unique Identification for Regional Integration and Inclusion Project* (English). Washington, DC: World Bank Group. *http://documents.worldbank.org/curated/en/771571528428669934/C%C3%B4te-dIvoire-Guinea-and-ECOWAS-Commission-West-Africa-Unique-Identification-for-Regional-Integration-and-Inclusion-Project*.
[16] 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).
[17] *See* Glossary, above.
[18] World Bank. 2017. *Combatting Cybercrime: Tools and Capacity Building for Emerging Economies*. Washington, DC: World Bank Group. *www.combattingcybercrime.org*.

identification for service delivery, cybersurveillance and governance since Phase 1 of the WURI program include:

a) ***Safeguarding the poor and the vulnerable in a "brave new world"***. *f*ID systems play a key role in improving inclusion and coverage of social safety programs. They are all the more relevant in helping scale up programs to new beneficiaries at times of covariate shocks, such as the COVID-19[19] pandemic. Additionally, protections and safeguards that go well beyond a "do-no-harm" approach are needed to mitigate the risks amplified through the adoption of digital technologies such as artificial intelligence, predictive analytics and biometric identifiers.[20] Managing risks of surveillance, poor public accountability, discrimination and entrenchment of inequality, and creating and maintaining trust in *f*ID systems is critical to achieving universal coverage and to fostering system use across services, both public and private. Further, experience has shown that trust can be easily undermined where weak governance and institutional capacity allow abuses to occur. ***In light of these frontier risks and concerns, the Program in Phase 2 aims to (i) carry out additional sensitization, policy dialogue and technical assistance to ensure inclusion; (ii) continue support for strengthening countries' legal and regulatory frameworks and put in place risk management measures, including continued emphasis on the narrow and explicit purpose limitation of fID systems to facilitate service delivery, and their separation from systems serving security, law enforcement and/or surveillance objectives; and (iii) further strengthening legal and administrative grievance redress mechanisms (GRMs).***

b) ***Building a culture of trust between the State and individuals through data protection.*** The legal and institutional framework should be supported by a broader privacy regime, by offering robust data protection guarantees, as well as by actively promoting non-discrimination and inclusion. To achieve this end, a law alone is not sufficient: the governance and institutional arrangements must engender a culture of trust between the State and individuals, otherwise individuals will be unwilling to give the authorities their data. Beyond assuring the existence of basic data privacy rights in the law, more granular and easily comprehensible texts need to be developed that are understood to extend and apply to all actors (e.g., agents at delivery points, systems' operators). ***In Phase 2, the Program will extend greater support for financing data protection and privacy and cybersecurity objectives, strengthening adoption of privacy-by-design, as well as a trust framework for regional interoperability and service delivery.***

c) ***Finding "windows of opportunity" in the political economy of reforms***. Participating countries are grappling with complex political, cultural and legal legacies around the deployment of identification systems. For instance, biometric voter registration and identity verification in the context of elections is contentious in a number of participating countries and tied to tricky identity politics that are exacerbated by historic migration patterns across the subregion. It is complicated by ethnic affiliations which may

[19] The coronavirus disease (COVID-19), caused by the 2019 novel coronavirus (SARS-CoV-2), has been spreading rapidly across the world since December 2019 with significant public health, social and economic impacts.

[20] The Special Rapporteur on extreme poverty and human rights said in 2019 to the UN General Assembly that "as humankind moves, perhaps inexorably, towards the digital welfare future it needs to alter course significantly and rapidly to avoid stumbling zombie-like into a digital welfare dystopia." UN Human Rights Council, *Report of the Special Rapporteur on Extreme Poverty and Human Rights on Promotion and protection of human rights: Human rights questions, including alternative approaches for improving the effective enjoyment of human rights and fundamental freedoms*. 11 Oct. 2019, A/74/48037. *https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25156*.

contrast with national ones, as well as by the historical regimes that the countries have adopted.[21,22] Further, many West African countries model themselves according to the Civil Law tradition of France,[23] under which the ability to identify oneself is not easily understood apart from the question of "legal identity", and in which the Civil Registry (or "*état civil*"), which records vital events of the population (typically births, deaths, marriages), plays a principal part in both creating and attributing legal identity, and is administratively burdensome.[24,25,26] ***In Phase 2, the Program will: (i) create further space for careful political economy review, analysis and ethnographic studies to map vulnerable populations and the barriers they face in accessing identification; and (ii) provide additional financing for targeted communications and messaging to all stakeholders, finding windows of opportunity for nurturing the reforms, and strengthening political buy-in and commitment.***

d) ***Targeted approaches for closing the gender gap in identification.*** Evidence shows a gender gap in ownership of identity credentials across all countries in the region. Women face additional constraints including restriction on their mobility, lack of time and financial costs. Social norms also may limit women's demand for identity credentials. Identification needs to be tied to those services used by women. ***In Phase 2, the Program will ensure: (i) consultations include representatives from women's groups; (ii) targeted communications and outreach campaigns indicating, among others, the importance and benefits of registration for all members of a household as well as processes for registration; (iii) where possible, customized registration processes (for instance, mobile registration units, female enumerators) to address mobility and other constraints; and (iv) gender-disaggregated monitoring of both registration and use of the fID system.***

5. **Operational, institution and political economy lessons learned from Phase 1 of the Program have informed the design and resulted in targeted improvements in the preparation of Phase 2. These include the following:**

a) ***Creating institutional anchorage that assures unbiased, crosscutting appeal*****.** In light of the political economy challenges, the Program's operations need to be designed to transcend electoral politics and to have a "trusted" institutional home for coordinating across silos and assure purpose limitation, thereby ensuring that *f*ID systems are used for service delivery and not for security or surveillance purposes. The *f*ID System Authority needs to be able to operate transversally and to gather political support from multiple sectors and agencies, while also having the mandate, authority and resources to implement a system that is fully aligned with the *Principles on Identification for Sustainable Development: Toward the Digital Age* ("*ID4D Principles*")[27]. ***In Phase 2, the Program will: (i) institutionally anchor the fID systems***

[21] Banegas, Richard.2011. *Post-election Crisis in Côte d'Ivoire: The Gbonhi War*. African Affairs. *https://academic.oup.com/afraf/article-abstract/110/440/457/107855.*
[22] Marshall-Fratani, Ruth. 2006. *The War of "Who Is Who": Autochthony, Nationalism, and Citizenship in the Ivoirian Crisis*. African Studies Association. *http://projects.chass.utoronto.ca/ruthmarshall/wp-content/uploads/2011/07/War-of-who-is-who.pdf.*
[23] Of the sixteen countries in West Africa, ten were once French colonies.
[24] Aïdan, Géraldine & Debaets, Emilie. *L'identité juridique de la personne humaine*. L'Harmattan. 1 juin 2013.
[25] *See* Glossary, above.
[26] The notion of identity in the Civil Law tradition is often in opposition to the visions espoused by countries following Common Law tradition, where the question of legal identity is only an issue in a subset of matters.
[27] World Bank. 2018. *Principles on Identification for Sustainable Development: Toward the Digital Age (English)*. Washington, DC: World Bank Group *http://documents.worldbank.org/curated/en/213581486378184357/Principles-on-identification-for-sustainable-development-toward-the-digital-age* ("*ID4D Principles*"). Endorsed by 25 international organizations, including various UN agencies, the African Development Bank and other development partners, the *ID4D Principles* include universal coverage, accessibility, robust, secure, responsive and sustainable design, as well as building trust by protecting privacy and user rights, as key elements to the building of identification systems. The *ID4D Principles* of 2018 are incorporated in the Financial Agreements between the World Bank and each WURI participating country.

under a dedicated, independent fID System Authority benefiting from structural checks-and-balances to safeguard against system and data abuse; (ii) provide support for extensive stakeholder consultations on institutional arrangements; (iii) support capacity-building to ensure implementation capacity and increased financing for project management; and (iv) encourage budget financing for the identification authorities. Building robust institutional measures alone cannot guarantee that the identification data will be kept interference-free, but it will help to build capacity and therefore to assure a culture of accountability, with the presence and support of civil society.

b) ***Enhancing technical capacity for implementation, innovation and social assessments.*** Phase 1 implementation has highlighted the challenges associated with attracting high quality technical and managerial staff who can lead implementation, introduce innovation and conduct rigorous social assessment studies. Furthermore, the procurement strategy developed for Phase 1 countries included a host of complex procurement packages as well as multiple individual consultants for technical assistance and social assessments, resulting in slow progress on procurement and hence implementation. ***In Phase 2 the Program will: (i) propose a smaller number of higher-value procurement packages, and have a limited number of individual consultants for technical assistance; (ii) consider the procurement of an owner's agent to help bolster the capacity of the project implementation unit (PIU) by bringing in high-quality technical staff to provide consistent and coherent advice, technical and administrative assistance, and to support with conducting social assessments and building capacity in the fID System Authority.***

c) ***Strengthening the Program's regional approach*****.** Institutional arrangements at the regional level remain weak. Nonetheless, country interest in regional dialogue and benefits is considerable, and each country's *f*ID system needs to be open to operating in a larger, regional context. ***In Phase 2, the Program will strengthen regionality by: (i) setting up a steering committee to ensure long-term consistency and dialogue to support the establishment of fID systems and the policy measures, technical standards and mechanisms needed for regional interoperability; (ii) promoting cross-border use-cases of service delivery through dialogue and joint prototyping, where possible; and (iii) including financing in Component 3 for the linking of national systems.***

d) ***Emphasizing the role of fID systems in service delivery from an early stage.*** Creating a shared understanding and key stakeholder buy-in for this vision requires early, sustained engagement with government, general public and service providers. Further, *f*ID system registration will be free, and authentication methods designed and adapted to prevent exclusion.[28] ***In Phase 2, the Program lays greater emphasis on: (i) engagement across government to develop national strategies for using fID credentials for service delivery; (ii) increased financing for communications and outreach; and (iii) designing appropriate service delivery and authentication methods according to an all-doors-open policy[29] so as not to inadvertently lead to any form of exclusion, especially of the poor and vulnerable from receiving benefits and services.[30] Phase 2 of the Program has already identified services and***

[28] For example, in rural areas with poor connectivity, there is little merit in designing a completely online system of biometric, without manual touchpoints or fail-safe methods.
[29] An "*all-doors-open policy*" means that *f*ID system registration might be completed at any point where services might be delivered, such as a hospital, school or a cash transfer payment point. *See* Lindert, Kathy; George Karippacheril, Tina; and Rodriguez Caillava, Ines. 2020. *Sourcebook on the Foundations of Social Protection Delivery Systems.* World Bank: Washington, DC (*forthcoming*).
[30] *https://www.theguardian.com/technology/series/automating-poverty*.

initiated discussions with providers in the four countries: Benin, linking to the government's flagship health and pension insurance program and the social registry; Burkina Faso, linking to universal healthcare, social safety nets and education; Niger, linking to smart villages, financial inclusion, safety nets and civil servant registration; and Togo, linking to the social registry.

e) ***Coexistence with existing systems.*** There needs to be greater clarity as to how *f*ID systems coexist and interoperate with other functional identification initiatives. At the country level, the project will emphasize that the *f*ID system will not replace any of the existing functional identification initiatives. It will merely serve the need to ensure universal registration and access to unique identification for all persons, whether they are citizens, residents or simply passing through the territory, in order to have reliable information enabling the targeted provision of public, social and commercial services. ***Phase 2 includes further policy dialogue and increased engagement with all stakeholders to this end.***

B. Updated MPA Program Framework

6. **With the addition of Phase 2 countries, the Program will be implemented in six, contiguous countries in the ECOWAS region.** (*See* Map in Annex 4.) On the basis of the ECOWAS Protocol relating to Free Movement of Persons, Residence and Establishment[31], which establishes the right to enter, reside and establish economic activities among Member States, Phase 2 will seek to extend and to build linkages to two Sahelian countries (Burkina Faso and Niger) and two coastal countries (Benin and Togo), joining to Phase 1 countries (Côte d'Ivoire and Guinea). Subsequent phases may include countries, contributing to building a regionally integrated and inclusive economic and labor-mobility corridor.

7. **The tables below summarize the overall distribution of costs among Phase 2 countries, as well as between national and regional IDA and type of financing (credit / grant).**

Table 1: Regional and National Distribution of Financing for Phase 2

Country/Regional Entity	National IDA		Regional IDA		Total (US$, million)
	Grant (US$, million)	Credit (US$, million)	Grant (US$, million)	Credit (US$, million)	
Togo		24.00	24.00	24.00	72.00
Benin		15.00	15.00	15.00	45.00
Burkina Faso	-	25.00	25.00	25.00	75.00
Niger	-	27.00	27.00	27.00	81.00
TOTAL					273.00

[31] ECOWAS. 29th May 1979. *Protocol Relating to Free Movement of Persons, Residence and Establishment.* A/P.1/5/79.

Table 2: Revised Program Framework

Phase #	Project ID	Sequential or Simultaneous	Phase's Proposed DO*	IPF or PforR	Estimated IDA Amount (US$ million)	Estimated Other Amount (US$ million)	Estimated Approval Date	Estimated Environmental & Social Risk Rating
1	P161329	-	To increase the number of persons in Côte d'Ivoire and Guinea who have government-recognized proof of unique identity that facilitate access at least one public service.	IPF	122.10	0.00	05 Jun. 2018	Category B
2	P169594	Simultaneous	To increase the number of persons in Togo, Benin, Burkina Faso and Niger who have government-recognized proof of unique identity that facilitate access to access at least one public service.	IPF	273.00	0.00	23 Apr. 2020	ESF 'Substantial'
Total					395.10	0.00		
Revised Financing Envelope					395.10			
Board-Approved Financing Envelope					317.10			

II. REGIONAL CONTEXT

A. Relevance to Higher Level Objectives

8. **Robust and inclusive *f*ID systems advance sustainable development and the World Bank's twin goals of ending extreme poverty and of boosting shared prosperity in numerous ways**.[32] *f*ID systems boost access to services, especially for the poorest and most vulnerable. Moreover, the identity verification and authentication mechanisms offered by the *f*ID system strengthen the integrity, cost-effectiveness and ease of service delivery across a number of sectors, including health, educational, financial and social services within countries and across the region. The Program also contributes to closing the gender gaps in identification, and provide a means to enable access to services for those vulnerable to climate change risks and fragile contexts. Participating ECOWAS Member States are expected to reap substantial socioeconomic benefits at both the regional and national levels over the medium-to-long term.

9. **The Program contributes to the World Bank's Regional Integration (RI) Strategy.**[33] By creating regionally interoperable *f*ID systems, underpinned by common legal, policy and technical frameworks which allow for the mutual recognition of *f*ID credentials and which support for linkages with services, the Program will contribute to three strategic pillars of the RI Strategy. First, it will contribute directly to Strategic Priority 3: Scale-up Access to Quality Public Services and Entrepreneurship through Complementary Regional Solutions and Objective 3.3: Promote harmonized development of information systems / statistics and national identification systems to improve provision of services. Second, the Program will also support Strategic Priority 1: Generate Economic Dynamism Along Regional Economic Corridors, especially Objective 1.3: Harmonize policy and reduce non-tariff barriers to promote trade and improve productivity along these economic corridors. Third, it will contribute to Strategic Priority 2: Develop Functioning Regional Markets in Identified Priority Sectors, through Objective 2.3: Address market fragmentation in financial sector and ICT/telecommunications sector by promoting harmonization of standards and policies and by expanding access and reducing costs to consumers.

10. **The Program is aligned with the Country Partnership Frameworks (CPF) of all four countries.** For Togo, the Program supports CPF FY17-20 Focus Area 2: Inclusive public service delivery, and in particular Objectives 2.2 and 2.3, to strengthen basic services at the local level and social safety nets for the most vulnerable.[34] For Benin, it is relevant to achieving the CPF FY18-23 Objective 8: Improving social protection systems. In particular, it will support the improvement of administration of pensions and health insurance by linking the *f*ID system with the Government's flagship insurance program, Insurance to Strengthen Human Capital (ARCH).[35] For Burkina Faso, the Program supports CPF FY18-23 Objectives 2.3: Expand social protection to the most vulnerable and Objective 1.4: Promote Small and Medium Enterprises and access to inclusive finance.[36] For Niger, the Program contributes to CPF FY18-22 Objective 5: Improved social protection system and ability to manage forced displacement and Objective 6: Improved access to digital services.[37]

[32] World Bank. "What We Do". *https://www.worldbank.org/en/about/what-we-do.*
[33] World Bank, International Finance Corporation and the Multilateral Investment Guarantee Agency. 2017. Supporting Africa's Transformation: Regional Integration and Cooperation Assistance Strategy for the period FY18-FY23. Report No. 121912-AFR.
[34] World Bank. 2017. Country Partnership Framework for the Togolese Republic. Report No. 112965-TG.
[35] World Bank. 2018. Country Partnership Framework for the Republic of Benin. Report No. 123031-BJ. "*Assurance pour le Renforcement du Capital Humain.*"
[36] World Bank. 2018. Country Partnership Framework for Burkina Faso. Report No. 123712-BF.
[37] World Bank. 2018. Country Partnership Framework for the Republic of Niger. Report No. 123736-NE.

11. **The Program contributes to the Africa Human Capital Plan by facilitating access to services**.[38] While progress has been made on the main ingredients of next generation's human capital—defined as survival, schooling and health—many challenges remain. The Program will support achieving these targets in the six countries covered by facilitating access to services through regionally interoperable *f*ID systems. This includes linking *f*ID systems to safety net programs and social registries, health and pension programs, financial inclusion, women's inclusion and empowerment and labor mobility.

B. Country Context

(i) Togo

12. **Economic activity regained momentum in 2018 and the economic outlook remains favorable.** After declining in 2017 to 4.4 percent amid heightened political tensions and fiscal consolidation, growth in 2018 reached 4.9 percent, supported by stronger private consumption, public investment and a robust performance of the service sector. In 2019-2021, growth is projected to be around 5.2 percent.

13. **Although declining, poverty remains high and is geographically concentrated in rural areas**. The poverty rate (using the national poverty line of CFAF 943.6 per day) decreased from 58.7 percent in 2011 to 55.1 percent in 2015. Recent simulations suggest poverty has continued to fall since 2015, particularly in rural areas thanks to relatively strong agricultural production. However, the pace of poverty reduction is expected to slow down. Downside risks include political uncertainty, heightened insecurity in neighboring countries and banking sector vulnerability.

14. These economic projections were written before the impacts of the COVID-19 pandemic were understood.

- ***Identification Ecosystem***

15. **The principal credentials in Togo are the National identity (NID) cards, passports and voter cards.** NID cards and passports are issued by the Directorate-General for National Documentation within the Ministry of the Interior .[39] NID cards—issued since 2006—are plastic, with a personal identification number and a tamper-proof seal, and can be obtained for CFAF 5,000 (approximately US$8.48). They are not mandatory, and are complicated to obtain, with only about 40 percent of the adult populations estimated to have one. Further, there is a large gender gap in coverage: 68.5 percent of women lack a NID card, compared to 51.9 percent of men[40].

16. **Following biometric voter registration in 2014, voter cards became the most common form of identification in Togo for citizens.** The voter registration drive, conducted by the Independent National Electoral Commission (CENI), used its existing database of three million records to check and remove all records of deceased and invalid citizens, including those that had been lost or duplicated. CENI verifies both demographic data and biometric data (*i.e.*, ten fingerprints). After this two-step verification is complete, the citizens receive a printed voter card [41]. Based on the latest voter registration data from Togo's 2018 elections, it is estimated that 75 percent of the electoral population have voter cards. However, voter cards are not relevant for all persons (including children and non-nationals), and are not accepted for access to several services.

[38] World Bank. 2019. Africa Human Capital Plan. *https://www.worldbank.org/en/region/afr/publication/africa-human-capital-plan*.
[39] *Décret n° 2003-268/PR du 29 octobre 2003 portant rattachement du Service des Passeports et des Etrangers au Ministère de l'Intérieur, de la Sécurité et de la Décentralisation*.
[40] World Bank. Global Findex Survey, 2017.
[41] World Bank. 2017. *The State of Identification Systems in Africa*. Identification for Development. Washington, DC: World Bank Group. *http://documents.worldbank.org/curated/en/298651503551191964/pdf/119065-WP-ID4D-country-profiles-report-final-PUBLIC.pdf*.

17. **Since July 2017, the Government has been developing the "e-ID Togo" project to enable the targeted provision of public, social and commercial services by ensuring unique identification for all persons on Togolese territory.** Providing the basis for Togo's *f*ID system, "e-ID Togo" will develop a modern biometric system allowing all persons to identify themselves, be they citizens, residents or simply passing through Togolese territory.

- ***Legal and Institutional***

18. **Togo is putting in place the foundational elements needed for creating a robust data protection and privacy regime.** Togo recently legislated a data protection law,[42] inspired by and closely tracking the approach of the European Union's General Data Protection Regulation (GDPR)[43] which sets the present high-water mark in the data protection and privacy world. The law also creates an independent and autonomous data protection authority to supervise and implement the new regime, although that authority has yet to be operationalized. Several other relevant laws have either been legislated or are in the works.[44]

19. **The Government is progressively building the institutional anchorage to implement the identification agenda.** A Steering Committee led by the Ministry of Digital Economy[45] and composed of four other ministries (Interior, Territorial Administration, Justice and Defense) is in charge of the identification agenda. Under the direction of the Steering Committee, the project will be managed by an existing PIU attached to the Ministry of Digital Economy.[46] The Government intends to establish an independent, high-level agency that will work transversely with the entire Togolese administration to facilitate access to services through the use of a basic identification system.

- ***Access to Services***

20. **Togo is approaching its project as one that is open to all persons, and with the explicit objective of facilitating access to services.** The Presidency has championed the development of the digital economy as a way of increasing inclusion, of furthering regional integration and of boosting the country's visibility, and has placed the attribution of a UNI to all persons in the territory of the country as an essential prerequisite. Besides, the Government of Togo has made the development of a national biometric identification coupled with a social registry one of the enablers of the implementation of its vision of consolidating social development and strengthening inclusion mechanisms, as established in the National Development Plan. The Government of Togo expects the linking of the social registry to the *f*ID platform to facilitate better intake, registration and needs assessment of potential beneficiaries of social services.

21. **Although restricted by limited internet connectivity, both the country's small geographical size and the limited number of actors in telecommunications position Togo well to expand mobile services to its population.** Togo's two telecommunications operators, Togocel and Moov, are both in the process of strategizing how their networks and user base might be extended, both by increasing connectivity to more remote parts of the country, but also by

[42] *Loi n° 2019-014 du 29 octobre 2019 relative à la protection des données à caractère personnel*.
[43] Regulation (EU) 2016/679 of 27 April 2016 (GDPR).
[44] *See, e.g., loi n° 2013-003 du 19 février 2013 portant modification de la loi n° 2012-018 du 17 décembre 2012 sur les communications électroniques ; loi n° 2017-007 du 22 juin 2017 relative aux transactions électroniques ; décret n° 2018-062/PR du 21 mars 18 portant règlementation des transactions et services électroniques au Togo ; loi n° 2017-006 du 22 juin 2017 d'orientation sur la société de l'information au Togo (LOSITO) ; loi n°2018-026 du 07 décembre 2018 sur la Cybersécurité et la lutte contre la Cybercriminalité ; décret n° 2019-095/PR du 15 février 2019 portant attributions, organisation et fonctionnement de l'Agence nationale de la cybersécurité (ANCY)*.
[45] *Ministère des Postes, de l'Economie numérique et des Innovations technologiques*.
[46] *Arrêté n° 005/MPENIT/CAB du 23 décembre 2019 portant autorisation de gestion des ressources fiduciaires du projet e-ID Togo par l'Unité de Coordination de Projet WARCIP*.

facilitating access to microfinance. Private sector banks are equally looking for means of reliably authenticating individuals in order to offer more robust banking and credit services.

22. **Additionally, the Government wishes to ensure coordination between the general population and housing census processes planned for 2020 and the enrolment of individuals for the establishment of the identification system.** The Government seeks to ensure efficiency gains in technical choices, and administrative functions.

(ii) Benin

23. **Economic growth accelerated to 6.7 percent in 2018 and is projected to remain high in the coming years.** This acceleration has been mainly driven by booming cotton production, and strong construction and port activity following a series of reforms that improved port management and facilitated trade. However, Nigeria's decision to unilaterally close the shared border in August 2019 will impact growth projections.[47]

24. **Although declining, poverty levels remain high.** The World Bank estimates that the share of the population living below US$1.9 a day (2011 PPP) declined from 49.5 percent in 2015 to 46.4 percent in 2018. Nonmonetary poverty indicators have improved over this period as well. Inequality is estimated to be moderate based on consumption aggregates, with a Gini coefficient of 48.0 in 2015.[48]

25. These economic projections were written before the impacts of the COVID-19 pandemic were understood.

- ***Identification Ecosystem***

26. **The principal identity credentials in Benin are the birth certificate and the NID card.** In keeping with the Civil Law tradition, the birth certificate establishes an individual's legal identity. However, as of 2017, 14.4 percent of children aged zero to four years have not had their birth registered, and only 64 percent have a birth certificate.[49] The RAVIP project, which had the objective of identifying all person in the territory of the country[50], revealed an even larger gap in birth registration and certification, as about 25 percent of the registered population could not present a birth certificate for enrollment.[51] For adults in Benin, the principal identity credential is the NID card, which is mandatory for citizens aged 18 and over. Extensive supporting documentation is required to obtain a NID card, as the credential testifies to nationality; at CFAF 2,400 (approximately US$4.12), and with a validity period of five years, the NID card is relatively costly for much of the population.[52] As of 2017, the coverage of the NID card was estimated at 46 percent (5.14 million of a population of 11.18 million), and only 37.2 percent for women.[53]

27. **Having registered over 10 million people[54]—or close to 90 percent of its population—the Government is now looking to build a *f*ID system in order to facilitate access to services and to boost inclusion**. Over a period of six

[47] In mid-August 2019, Nigeria decided to close its shared border with Benin to curb smuggling of rice and other commodities, banning the entry of 29 Beninese export products. As of March 2020 this border remains closed.
[48] Based on World Bank. 2019. Macro Poverty Outlook - Benin. *http://pubdocs.worldbank.org/en/720441492455091991/mpo-ssa.pdf*.
[49] Ministère du Plan et du Développement. 2019. *Cinquième Enquête Démographique et de Santé au Bénin* (EDSB-V): 2017-2018. Institut National de la Statistique et de l'Analyse Économique (INSAE). *https://dhsprogram.com/pubs/pdf/FR350/FR350.pdf*.
[50] *Décret n° 2016-724 du 25 novembre 2016 définissant les modalités du Rencensement administratif à Vocation d'Identification de la Population.*
[51] *https://www.gouv.bj/actualite/309/amelioration-de-letat-civil-au-benin-la-phase-pilote-de-distribution-gratuite-des-actes-de-naissance-du-pedec-officiellement-lancee/*.
[52] World Bank. ID4D, *The State of Identification Systems in Africa: Country Briefs*.
[53] World Bank. Global Findex Survey 2017.
[54] *https://www.gouv.bj/actualite/309/amelioration-de-letat-civil-au-benin-la-phase-pilote-de-distribution-gratuite-des-actes-de-naissance-du-pedec-officiellement-lancee/.*

months, the Government conducted a registration sweep of the country's population under RAVIP project.[55] In so doing, the Government collected biometrics (ten fingerprints and photograph), and assigned each registrant a UNI.[56] However, the need for a complementary registration campaign and to update the RAVIP database is an important step in constructing of the *f*ID system.

28. **The Government has undertaken important initiatives to integrate its identification systems and to ensure universal inclusion.** The Government is seeking to create a more integrated and unified identification ecosystem, especially as non-nationals are only indirectly included in the Civil Registry, and as RAVIP required identity documentation (or two witnesses and the village chief's validation) and collected surrounding demographic details, such as nationality. In the process of RAVIP registration, the Government has sensitized its population to the practical realities of being identified but that database is a static snapshot. Several additional related initiatives have been undertaken, principally aiming at reconstituting the Civil Registry, with measures allowing for exceptional registration of the undocumented.

- ***Legal and Institutional***

29. **Benin has a robust data protection regime in place**. In 2009, Benin enacted its data protection law, which adhered to international good practices of the day, and which also created an autonomous and independent data protection agency.[57] As of 2017, Benin also has instituted a cybersecurity regime[58] with a cybersecurity authority, ANSSI[59]. Further, Benin is in the final stages of acceding to the Convention on Cybercrime of the Council of Europe (commonly known as the Budapest Convention)[60] and to ratifying the African Union Convention on Cyber Security and Personal Data Protection (commonly known as the Malabo Convention)[61].

30. **The Government has made significant progress towards building an institutional anchorage to implement the identification agenda, gathering stakeholder and political support behind a commonly shared vision**. In order to explore and guide the process, the Government created a cross-sectoral Technical Steering Committee, which led RAVIP. Attached to the Presidency, and bringing together key stakeholders and competencies, the Committee is being institutionalized in the autonomous National Agency for the Identification of Persons (ANIP)[62,63], which will build upon RAVIP, with the goal of turning a presently-static database into an active, operational *f*ID system with autonomy and institutional resources.

- ***Access to Services***

[55] *Loi n° 2017-08 du 19 juin 2017 portant identification des personnes physiques en République du Bénin*.
[56] *See, e.g.*, Government of Benin. "Présentation du RAVIP". *https://ravip.bj/presentation/*.
[57] *Loi n° 2009-09 du 22 mai 2009 portant protection des données à caractère personnel en République du Bénin*. *Autorité de Protection des Données Personnelles*; formerly the *Commission Nationale de l'Informatique et des Libertés.* This law was updated in 2017 with *Loi n° 2017-20 du 13 juin 2017 portant code du numérique en République du Bénin.*
[58] *Loi n° 2017-20 du 13 juin 2017 portant code du numérique en République du Bénin*.
[59] *Décret n° 2018-529 du 14 novembre 2018 portant approbation des statuts de l'Agence nationale de la Sécurité des Systèmes d'Information.*
[60] Council of Europe, *Convention on Cybercrime* ("Budapest Convention"), CETS No.185, 23 Nov. 2001. *https://www.refworld.org/docid/47fdfb202.html*.
[61] African Union, *Convention on Cyber Security and Personal Data Protection* ("Malabo Convention"), 27 Jun. 2014. *https://au.int/en/treaties/african-union-convention-cyber-security-and-personal-data-protection*. With only five ratifications, the Malabo Convention has not yet entered into force.
[62] *Loi n° 2017-08 du 9 juin 2017.*
[63] *Décret n° 2018-206 du 06 juin 2018 portant attributions, organisation et fonctionnement de l'Agence Nationale d'Identification des Personnes (ANIP).*

31. **The Government has made access to services not only the key objective but also the key incentive for being identified.** In order to improve access to basic social services and increase economic opportunities towards reducing poverty and inequality, the Government has put in place a social protection program, ARCH, to strengthen human capital.[64] ARCH will provide social protection services, including health insurance, retirement insurance, microcredit and training, for the poorest and most marginalized segments of the population. The Government recognizes the key role of a well-functioning *f*ID system for effective implementation of the ARCH program, as beneficiaries need to be authenticated to access services. Further, the Government's social safety net system, including the social registry, will also benefit from a well-functioning *f*ID system.

32. **Private sector actors, notably telecommunication operators and financial institutions, are particularly interested in the authentication services that a trusted *f*ID system would provide, thereby facilitating the expansion of their own customer base and operations.** The existing infrastructure is ready to support such initiatives: despite mobile-broadband penetration of only 29 percent and an estimated 53 percent unique subscribers' penetration rate,[65] almost 63 percent of the population and 75 percent of public education and health institutions are covered by 3G services, preparing the way for *f*ID system authentication services. Further, the World Bank-supported Digital Rural Transformation Project aims to extend connectivity to the 663 villages not currently covered and increase digital and financial literacy.[66]

(iii) Burkina Faso

33. **Growth increased from 6.3 percent in 2017 to 6.8 percent in 2018.** Growth came largely from a rebound in agricultural production, as well as from the financial services and ICT sectors. However, while growth is expected to have reduced poverty, intensifying insecurity has heightened vulnerability. Gross domestic product (GDP) growth is projected to stabilize around six percent in the coming years. Overall strong economic performance is estimated to have contributed to the decline in poverty from 40 percent in 2017 to 38 percent in 2018. While the deteriorating security situation has had limited impacts on economic activity, social impacts are substantial. Terrorism threats are the major domestic risks.[67]

34. **In a context of deteriorating security, the Burkinabe government is intensifying its efforts to deliver services to its population.** In addition to increasing violent extremism, particularly in the north and east regions of the country, the Government is faced with a growing number of internally displaced persons (IDPs). Overall it is estimated that insecurity has displaced almost 500,000 individuals and is affecting 1.5 million people, and that almost 250,000 people are believed to be food insecure, 90 percent of whom are IDPs.[68] To respond to the situation and to counter violent extremism, the Government is working to enhance service delivery in an increasingly challenging environment.

35. These economic projections were written before the impacts of the COVID-19 pandemic were understood.

- ***Identification Ecosystem***

[64] *Décret n° 2017-362 du 12 juillet 2017 portant création, attributions, organisation et fonctionnement du cadre institutionnel de pilotage du Projet "Assurance pour le Renforcement du Capital Humain (UCP-ARCH)"*.
[65] GSMA Intelligence 2019.
[66] Digital Rural Transformation Project - P162599.
[67] World Bank. 2019. Macro Poverty Outlook - Burkina Faso. *http://pubdocs.worldbank.org/en/720441492455091991/mpo-ssa.pdf*.
[68] World Food Program. 2019. Burkina Faso Emergency Response Situation Report #6. 15 Nov. 2019.

36. **The principal identity credentials in Burkina Faso are the birth certificate and the NID card.** As with other countries in the region, the birth certificate establishes an individual's legal identity. As of 2010 (the most recent available data point), birth registration of those aged under five years was estimated at 77 percent. However, important disparities remain throughout the territory: while 93 percent of births are registered in the capital of Ouagadougou, only 40 percent are recorded in the Sahel region.[69] Approximately 4.8 million people, or 27 percent of the population—including both children and adults—do not have an official proof of identity.[70] Among those 15 years of age and older, around 20 percent—and one in four women—do not have a NID card.[71]

37. **Although the original, long-form birth certificate ("*acte de naissance*") is cost-free, short-form birth certificates ("*extrait acte de naissance*"), which are required for most administrative purposes, have an administrative fee of CFAF 300 (approximately US$0.50).** Poor coverage of civil registration centers has impeded registration. In response, the National Strategy for Civil Registration 2016–2022 aimed to raise the number of secondary registration centers from around 1,000 to 5,000, and to digitize the whole process. However, implementation has experienced delays.

38. **It is in principle mandatory for all Burkinabe aged 15 years and over to be in possession of a NID card.** However, as a birth certificate is required to obtain a NID card, a significant share of the adult population remains excluded. The NID card is valid for 10 years and costs CFAF 2,500 to obtain (approximately US$4.20). The registration process of the NID card is almost fully digitized, with the National Identification Office (ONI) operating its own data center, and being responsible for registration and production. As of June 2019, 8.5 million (of 19.19 million) people had a NID card.[72]

39. **A roadmap for the implementation of a unique, electronic biometric identifier has been adopted by decree[73], and will help address system fragmentation between the CR and NID systems, each of which have their own identification numbers**. However, it has yet to be operationalized. It is intended that the unique identifier will be the basis of the WURI-financed *f*ID system.

- ***Legal and Institutional***

40. **Burkina Faso has a mature data protection regime**. Burkina Faso has a data protection law, one of the first in Africa, and has an internationally and regionally well-respected data protection authority.[74]

41. **The national identification system, which issues the NID card, and that of civil registration are administered independently.** NID cards are managed by the National Identification Office, which is attached to the Ministry of Security. Civil registration is managed through the civil registry offices coordinated by the Ministry of Territorial Administration, Decentralization and Social Cohesion's Directorate-General for the Modernization of the Civil Registry (DGMEC).

42. **Recently, the Government has undertaken steps towards putting in place a unique identifier and reforming the institutional framework in Burkina Faso.** To this end, the Government has adopted[75] a road map for the

[69] *https://data.unicef.org/topic/child-protection/birth-registration/.*
[70] Burkina Faso, *Enquête Multisectorielle Continue (EMC), Phase 1 : Rapport Thématique 1 : Caractéristiques sociodémographiques de la population*. Institution National de la Statistique Démographique. February 2015.
[71] World Bank. Global Findex Survey, 2017.
[72] World Bank. 2019. *Global ID4D Dataset*. Identification for Development. Washington, DC: World Bank Group (*forthcoming*).
[73] *Décret n° 2018-0497/PRES/PM/MDENP du 19 juin 2018 portant adoption de la feuille de route pour la mise en place d'un identifiant unique électronique de la personne (IU) au Burkina Faso*.
[74] *Loi n° 010-2004/AN du 20 avril 2004 portant protection des données à caractère personnes*.
[75] *Décret n° 2018-0497/PRES/PM/MDENP du 19 juin 2018 portant adoption de la feuille de route pour la mise en place d'un identifiant unique électronique de la personne (IU) au Burkina Faso*.

implementation of an electronic, biometrically-linked unique identifier for each person in Burkina Faso. This decree also created a Monitoring Committee charged with operationalizing the unique identifier by (i) undertaking an in-depth study for its implementation; (ii) creating the authority charged with the management of the unique identifier; and (iii) mobilizing the resources needed for its implementation.

- ***Access to Services***

43. **Particularly in regions faced with insecurity, the Government is aiming to strengthen human capital-focused service delivery, which would benefit from a unique identifier.** Up-to-date information on births and deaths, and a way to uniquely identify individuals to ensure quality service delivery and case management, will be crucial to the success of the Government's proposed universal health care program. Furthermore, the targeting of subsidies through the social registry, as well as the Government's social safety nets program, which has already reached more than 500,000 individuals, would greatly benefit from unique identification. The effort to expand mobile cash transfers to fragile areas, particularly in the north of the country, would particularly benefit from the existence of an interoperable *f*ID system.

(iv) Niger

44. **Niger's GDP growth has contributed to reducing overall poverty, although there are indications that extreme poverty might have worsened in recent years**. Growth increased from 4.9 percent in 2017 to 6.5 percent in 2018. Good performance in agriculture and strong activity in the construction and service sectors were the main drivers. Growth is estimated to have contributed to Niger's reduction in poverty from about 50.3 percent to 45.7 percent (using the international poverty line of US$1.90) between 2005 and 2014. However, extreme poverty might have worsened over the same period to the extent that the bottom 10 percent of the population experienced negative growth in consumption. The Gini coefficient deteriorated markedly from 28.6 percent in 2005 to 33.6 percent in 2014. This is driven by further worsening in structural inequalities in asset ownership such as land and livestock.[76]

45. **The Government recognizes that, in order to deliver services to its mostly rural, growing and partly nomadic population, it needs to make use of modern delivery systems, for which a unique identifier is crucial**. Niger's young and rapidly growing population lives largely in rural areas.[77] Particularly in the vast north of the country, population density is low[78] and there are significant nomadic populations. Making expanding access to services a priority for the country, the Government has recognized that it will need to build on digital transformation and modern technologies to deliver services[79] and that a trusted and inclusive identification system is essential to implement its ambitious plans.

46. **Persistent fragility and significant populations of IDPs, refugees and returnees reinforce the need for robust identification.** Due to regional migration routes passing through the country's territory, persistent fragility, conflict and violence, growing security incidents (especially on the country's borders with Burkina Faso, Chad, Mali and

[76] World Bank. 2019. Macro Poverty Outlook - Niger. *http://pubdocs.worldbank.org/en/720441492455091991/mpo-ssa.pdf*.
[77] With an urbanization rate of 16.4 percent in 2018, only Burundi, Papua New Guinea and Liechtenstein had a lower proportion of its urban population in its overall population than Niger. *https://databank.worldbank.org/source/2?series=SP.URB.TOTL.IN.ZS&country=*.
[78] Niger's overall population density of 17.7 people per square km of land area is comparable to that of Mali. *https://databank.worldbank.org/reports.aspx?source=2&series=EN.POP.DNST&country=*.
[79] The Government of Niger sees digital transformation as key to enhanced service delivery and the development of the country and has made investment in digital technologies a cornerstone of its development agenda. Through its "Niger 2.0" strategy, which feeds into the Niger 2035 Strategy for Sustainable Development and Inclusive Growth (SDDCI), the government aims at benefiting from anticipated dividends of the digital economy and intends to transform all sectors of socio-economic life.

Nigeria), natural disasters and other factors, Niger hosts around 425,000 IDPs, refugees and returnees. For these populations only fragmented identification systems exist significantly hampering service delivery.

47. These economic projections were written before the impacts of the COVID-19 pandemic were understood.

- ***Identification Ecosystem***

48. **Only two in three births are registered, and more than half of Nigerien adults do not have a NID card.** [80] Overall, more than six million adults and four million children are estimated to lack an official proof of identity.[81] The 2017 Global Findex Survey[82] indicates a large gender gap in the coverage of the NID card: 68 percent of women, compared to 43 percent of men do not have the NID card.

49. **Various stakeholders have put in place stand-alone identification systems, leading to a high level of fragmentation and exclusion.** Numerous non-interoperable identification systems implemented by state and non-state actors alike exist, yet it is estimated that 55 percent of the population aged 15 and above and about one-third of children still do not have a government-recognized proof of unique identity. In addition to the Civil Registry, the NID system and passport database, the Government is currently in the process of biometrically registering voters for the 2020/21 general elections. With World Bank financing, it is also creating a biometric register for civil servants, pensioners and students.[83] In addition, development partners, such as United Nations High Commissioner for Refugees (UNHCR) and International Organization for Migration (IOM), also carry-out biometric registration for their target populations. Lastly, as part of a broader project aimed at digital transformation, the African Development Bank (AfDB) has carried out a study on the feasibility of unique identification (SIGIEP). (For a non-exhaustive list of on-going development partner engagements in WURI countries, *see* Table 4.) To reduce fragmentation, the Government is currently trying to assess and harmonize the various identification initiatives. By putting in place a *f*ID system that includes all people, and which is interoperable other initiatives and service providers, WURI will take into account the objectives of coordination and inclusion.

- ***Legal and Institutional***

50. **While Niger's data protection regime needs to be rendered fully operational, the core elements are in place.** A data protection law was passed in 2017, and the corresponding data protection authority was formally created through that the same law,[84] and with subsequent revisions strengthening the regime and the institution made in 2019.[85] Although the Authority's first members were sworn in on the November 27, 2019,[86] it remains to be fully operationalized: as of late October 2019, the Authority had no operational budget, administrative staff or dedicated

[80] World Bank. *Global ID4D Dataset*, 2018.
[81] World Bank. Global Findex Survey, 2017.
[82] Demirgüç-Kunt, Asli; Klapper, Leora; Singer, Dorothe; Ansar, Saniya; and Hess, Jake. *The Global Findex Database 2017: Measuring Financial Inclusion*. Policy Research Working Paper. 2018. World Bank Washington, DC. *https://globalfindex.worldbank.org/*.
[83] Financed by the World Bank: Public Sector Capacity and Performance for Service Delivery project - P145261.
[84] *Loi n° 2017-28 du 03 mai 2017, relative à la protection des données à caractère personnel*.
[85] *Loi n° 2019-71 du 24 décembre 2019 modifiant la loi n° 2017-28 du 03 mai 2017, relative à la protection des données à caractère personnel.*
[86] *Lettre n° 1651/MJGS/SG/DGAJ/DAP/C/OP du 6 novembre 2019 ; décret n° 2019-546/PRN/MJ du 20 septembre 2019 portant nomination de la Présidente et des membres de la Haute Autorité de Protection des Données à Caractère Personne*.

offices. Measures for allocating resources and reinforcing the Authority's independence are underway, but would be further supported by WURI.[87] A cybercriminality law also exists.[88]

51. **To reduce fragmentation, the Government is currently trying to assess and to harmonize the various identification initiatives and to implement a unique identifier.** Birth registration is done by the Ministry of the Interior's Directorate-General for Civil Registration, Migration and Refugees (DGEC).[89] Identification is carried out by the Directorate-General of National Police (DGPN) and by the National Gendarmerie (GN), both of which are under the auspices of the Ministry of the Interior. Plans to create a dedicated identification agency are being articulated, and will build upon a feasibility study, although its precise mandate is as-yet unknown. In an effort to build upon this base and to bring together the various other identification initiatives, an Interministerial Committee on Identification, chaired by the Ministry of the Interior and including key government stakeholders, has been created.[90] The Government's intention is to develop a *f*ID system that includes all persons in the territory of the country, irrespective of legal status; this initiative is intended to be the basis of the WURI-financed *f*ID system. To this effect, WURI will support a study of pertinent existing initiatives.

- ***Access to Services***

52. **Numerous services would benefit from the implementation of a robust and inclusive *f*ID system that allows individuals to be uniquely and reliably identified.** In addition to the Government's safety net programs,[91] which have reached around 140,000 households with cash transfers since inception and are currently expanding to another 50,000, and other human capital-focused services (*e.g.* eHealth), there are strong synergies with the Government's digital services and financial inclusion agenda. Through the World Bank-financed Smart Villages project, to be implemented by the National Agency for the Information Society (ANSI)[92], a unique identifier could facilitate access to digital and financial services for the most vulnerable and backstop the development of an electronic Know-Your-Customer (eKYC) registry, which would strengthen financial service delivery in the country and the region. A unique identifier would furthermore facilitate service delivery by partners such as UNHCR, IOM and others to host communities, refugees and IDPs, who often live in remote, inaccessible and unstable areas.

[87] In this regard, WURI will work with the Smart Villages for Rural Growth and Digital Inclusion project - P167543.
[88] *Loi n° 0267 du 25 juin 2019 portant sur la lutte contre la cybercriminalité au Niger*.
[89] *Loi n° 2019-29 du 1er juillet 2019, portant régime de l'état civil au Niger* ; *décret n° 2019-463/PRN/MI/SP/D/ACR du 23 aout 2019 fixant les modalités d'application de la loi n° 2019-29 du 1er juillet 2019, portant régime de l'état civil au Niger*.
[90] *Arrêté n° 963/MI/SP/D/ACR/DGECM-R du 09 septembre 2019 portant création, attributions, composition et fonctionnement du Comité Technique d'harmonisation des systèmes d'identification des personnes au Niger*.
[91] Financed through the World Bank: Niger Safety Net Project - P123399; Niger Adaptive Safety Net Project 2 - P166602.
[92] Niger: Smart Villages for Rural Growth and Digital Inclusion - P167543.

III. PROGRAM DESCRIPTION

A. Program Development Objective

(i) Program Development Objective (PrDO) and its relevance

53. The PrDO was not revised. The Program Development Objective of this MPA is to "*increase the number of persons in participating countries who have government-recognized proof of unique identity that facilitates access to services.*"

54. The PDO for Phase 2 of the Program is to "*increase the number of persons in the Togolese Republic, the Republic of Benin, Burkina Faso and the Republic of Niger who have government-recognized proof of unique identity that facilitates their access to services*."

(ii) Update on Key PrDO Indicators

55. **Progress towards the PrDO will continue to be measured through the following program-level outcome indicators**:

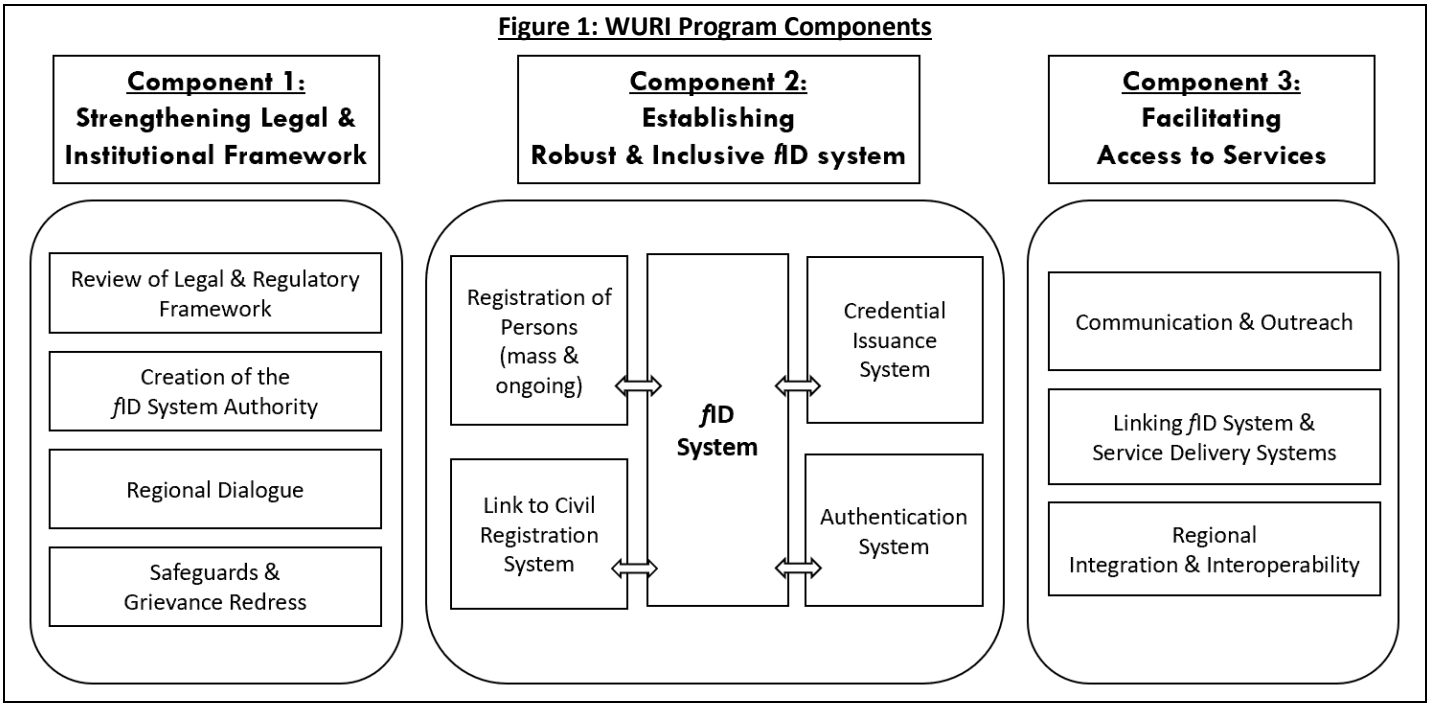
- ***Legal Robustness*:** The enabling legal and institutional framework for the development and support of the *f*ID system (including relevant identification and data protection and privacy laws, and a mandated *f*ID System Authority and data protection agency, respectively) is in place, in keeping with regional standards and international good practices;
- ***Technical Robustness*:** Existence of a *f*ID system which generates UNIs and is in alignment with international good practices;
- ***Inclusion and Coverage*:** Number of direct project beneficiaries who have received a UNI (of which women); and
- ***Access to Services*:** Number of national or regional functional public and private services linked to the *f*ID system.

B. Program Components

56. **Consistent with Phase 1, country-level operation of the Program is structured around three components**: (1) Strengthening the legal and institutional framework; (2) Establishing robust and inclusive *f*ID systems; and (3) Facilitating access to services through *f*ID credentials.

57. **Activities within each of these components have been adjusted to reflect lessons learned from Phase 1:**

Figure 1: WURI Program Components



58. **This section outlines the broad scope of each component as a generic framework that is applied and adjusted to each country-specific context**. (*See* Annex 2 for a detailed description of how these frameworks are applied to Togo, Benin, Burkina Faso and Niger.)

(i) PROGRAM COMPONENT 1 – Strengthening the Legal and Institutional Framework

59. **As in Phase 1, Component 1 will identify and address gaps in the legal and institutional frameworks and finance the preparation, development and implementation of the legal and institutional elements needed to underpin robust *ƒ*ID systems**. This Component will include appropriate legal and institutional safeguards to ensure the alignment of the design and implementation of the *ƒ*ID system with the *ID4D Principles* and international good practices, to strengthen data protection and privacy, as well as to bolster user rights throughout the identity lifecycle, especially in the context of data sharing. This Component will also support the establishment of independent oversight mechanisms, including third party monitoring, and effective and inclusive processes for grievance redress.

60. **At an institutional level, this Component will support the creation and reinforcement of the capacity of *ƒ*ID System Authority and project management support for the PIUs.** This Component will also finance ongoing capacity-building for administrators and operators of the *ƒ*ID system, both those at the central and decentralized levels.

61. **This Component will support activities to advance the regional dialogue on mutual recognition and cross-border authentication of *ƒ*ID credentials across participating ECOWAS Member States and put in place the governance and legal framework for regional interoperability**. This Component will facilitate regional dialogue leading to the definition of common standards and protocols. The aim will be the creation of a trust framework allowing beneficiaries to use either their UNI or *ƒ*ID credential for authentication purposes in order to access services not just domestically but also regionally, as facilitated by mutual recognition of *ƒ*ID systems.

(ii) PROGRAM COMPONENT 2 – Establishing robust and inclusive *f*ID systems

62. **As in Phase 1, Component 2 will finance the design, development and implementation of the *f*ID system, which will create UNIs linked to biometric data collected in accordance with international standards**. This Component will also finance the elaboration of a *National Strategy on Identification for Service Delivery* in each country. The Strategy will elaborate a financial and revenue model for the *f*ID System Authority in order to ensure sustainability. Particular attention will be paid to nuances allowing for institutional and technical interoperability mechanisms between the *f*ID system and the functional systems of sectoral services. Financing for the *f*ID system will include all the technical infrastructure necessary to operationalize the systems as well as technical advisory services to support the countries in aligning their systems with international good practice and to optimize system cost, security and utility. To ensure the operational sustainability of the *f*ID systems, the Component will support the use of secure data centers as well as backup centers, and the implementation of appropriate physical and virtual security measures to protect those databases (*e.g.*, from natural disasters, cyberattacks). Taking a Human-Centered Design (HCD) approach, the Program will seek to design the authentication model that works best for beneficiaries, especially the most vulnerable and potentially excluded groups. This Component will also, as in Phase 1, finance the design of a link between the *f*ID system and birth and death registration in order to allow for issuance of UNIs at birth, as well as to retire/deactivate UNIs after death.

63. **This Component will support the production of basic, low-cost credentials that will be issued at zero-cost to beneficiaries**. This Component will finance the production and delivery of basic *f*ID credentials printed on a low-cost material (*e.g.*, laminated paper, PVC), which does not contain a chip but which does include a machine-readable quick response (QR) code to store basic beneficiary data.

64. **Component 2 will finance the registration of all persons in the territory of the country, both through an initial mass registration campaign, as well as through continuous, permanent registration efforts**. Building on the legal basis established under Component 1, this Component will support the registration of all persons in the territory of the country, with as little paperwork or bureaucracy as possible, allowing all people, including those without any prior identification documents, to register. The design of *f*ID systems for registration, processing and issuance of *f*ID credentials will be informed by a HCD study. This Component will finance the procurement of registration devices and their operationalization, the contracting of temporary registration agents during the initial mass registration phase, as well as additional administrative, logistical, and transportation expenses associated with initial registration. Both for the ongoing registration communications campaign and the continuous, “steady-state”, registration, the Program will seek to leverage existing public infrastructure, such as health centers and schools. Where possible, and based on technical assessments, the project will reuse kits from other registration exercises.

(iii) PROGRAM COMPONENT 3 – Facilitating access to services through *f*ID credentials

65. **As in Phase 1, this Component will focus on service delivery at both the national and regional levels**. Building on each participating country’s *National Strategy on Identification for Service Delivery* developed under Component 2, this Component will enhance interoperability and facilitate secure data exchange between participating systems to enable identity verification and authentication for various services via the *f*ID system. It includes communications and community outreach, informing the population of the value of being registered, and bearing in mind the voluntary nature of the system. This Component will focus on awareness-raising and preparing the population—including vulnerable populations and women—for the registration sweep.

66. **This Component will finance the *f*ID system's authentication services**. In order for the *f*ID system to facilitate more effective service delivery, it must be able to authenticate beneficiaries at various points of service. Implementation of those authentication services will require particular attention to the idiosyncrasies of each particular service, and the methods that are most appropriate in each context.

67. **This Component will finance the linking of the *f*ID system with various service-delivery systems, both public and private, both at the national and regional level**. This includes the implementation of the technical architecture(s) for regional integration and interoperability. It includes also the design and development of public-sector systems for service providers that can pair with the *f*ID system and accept the authentication services that the *f*ID system will offer. Potential service sectors include health insurance programs, social protection programs (*e.g.*, cash transfers), emergency response programs (*e.g.* climate-related disasters, adaptive safety nets) and education (*e.g.*, student ID cards, empowerment programs for women and girls) and financial inclusion. At the regional level, potential programs include mobile services, financial services portability of pensions or cross-border trade. Links will be made in all the countries to enable authentication for mobile services (*e.g.*, SIM-card registration) and financial services (*e.g.*, eKYC).

Table 3: List of Service-delivery Systems with which the *f*ID System Could Be Linked[93]

Country	*Service-delivery Systems*
Regional	• Disease surveillance[94] • ECOWAS Energy Access[95] • Modernization of Living Conditions Surveys[96] • Sahel Digital Transformation[97] • Sahel Women's Empowerment[98]
Togo	• Social registry[99] • Social safety nets[100,101] • eServices/eAgriculture • Healthcare services[102,103] • Education[104,105]
Benin	• Social registry[106] • Access to local services[107] • ARCH human capital program[108]

[93] This table serves illustrative purposes, and is not exhaustive of possible existing or future services.
[94] Regional Disease Surveillance Systems Enhancement (REDISSE) - P154807.
[95] Regional Off-Grid Electrification Project - P160708.
[96] Regional Program to Harmonize and Modernize Living Conditions Surveys - P153702.
[97] Sahel Digital Transformation Program - P171532.
[98] Sahel Women's Empowerment and Demographics Project (SWEDD) - P163656.
[99] Supporting a Unified Social Registry for Integrated Social Protection System in Togo - P166630.
[100] Togo - Safety Nets and Basic Services Project - P157038.
[101] Togo - Community Development and Safety Nets Project - P127200.
[102] Togo Health System Performance Strengthening Project - P164886.
[103] Togo - Maternal and Child Health and Nutrition Services Support Project - P143843.
[104] Building Capacity In Uganda, Togo, Burkina Faso and Kosovo to Streamline Development of National Education Accounts - P165554.
[105] Togo - Quality and Equity Enhancement of Education Project - P172674.
[106] Community and Local Government Basic Social Services Project - P163560.
[107] Community and Local Government Basic Social Services Project - P163560.
[108] Benin: Support to Government's ARCH (Assurance pour le Renforcement du Capital Humain) Project - P172309.

	• eServices/eAgriculture[109] • Land registry
Burkina Faso	• Healthcare services[110] • Education[111] • Social safety nets[112] • Other services
Niger	• Student, civil servant and retiree registration[113] • Digital financial services[114] • Support to refugees and host communities[115] • Safety nets[116] • eServices[117]

C. Updated Program Results

68. **By the Program's end in 2028, the Program's aim is to have increased the number of persons in participating countries who have government-recognized proof of unique identity (*i.e.*, *f*ID credentials) to 100 million beneficiaries, thereby facilitating their access to services**. The Program aims to develop the necessary legal and institutional framework of participating client countries, while also attaining close-to-universal coverage of *f*ID credentials.

69. **The Program aims to develop a comprehensive enabling legal and institutional framework structuring the *f*ID system and linked systems**. Such a framework requires both (i) an enabling law that, among other things, supports an independent *f*ID System Authority responsible for rolling-out and maintaining the *f*ID system and (ii) a data protection and privacy law that provides the legal and institutional safeguards to support user-control of their data, and which is supported by an independent *f*ID System Authority.

70. **The legal frameworks of ECOWAS Member States continue to make important progress notably around data protection and privacy.** The program will continue to monitor institutional legal frameworks for data protection and identification since Phase 1, with cybersecurity added in phase 2. Of the 15 ECOWAS Member States, 12 have specific data protection legislation, most of which have also created an independent and central data protection authority. Across Africa, concern over data protection has steadily been gaining ground, with almost half of the continent's 54 countries having passed data protection laws. In 2010, ECOWAS adopted a Supplementary Act on Personal Data Protection,[118] and, in 2014, the African Union adopted the Malabo Convention. Additionally, several ECOWAS Member States have specific cybersecurity legislation, many of which of which have a dedicated cybersecurity authority.[119]

[109] Digital Rural Transformation Project - P163599.
[110] Health Services Reinforcement Project - P164696.
[111] Burkina Faso Safety Nets to Promote Education - P166556.
[112] Social Safety Net Project - P124015.
[113] NE-Public Sector Capacity and Performance for Service Delivery - P145261.
[114] Niger: Smart Villages for Rural Growth and Digital Inclusion - P167543.
[115] Niger Refugees and Host Communities Support Project - P164563.
[116] Niger Adaptive Safety Net Project 2 - P166602.
[117] Niger: Smart Villages for Rural Growth and Digital Inclusion - P167543.
[118] ECOWAS Supplementary Act A/SA.1/01/10 on personal data protection within ECOWAS (16th Feb. 2010).
[119] ECOWAS Directive C/DIR. 1/08/11 on fighting cyber-crime within ECOWAS (19th Aug. 2011).

D. Project Beneficiaries

71. **In Phase 2, the Program aims to provide *f*ID credentials to over 65 million potential beneficiaries in the ECOWAS region.** The Program is expected to provide *f*ID credentials to all persons physically in the territory of participating countries, irrespective of nationality, residency or legal status.

E. Role of Partners

72. **The World Bank is working closely with bilateral and multilateral development partners in the context of the Program.** Development partners stand to benefit from the Program, as their programming depends on their ability to identify and authenticate targeted beneficiaries. Given the absence of reliable and robust identification systems in most countries, development partners dedicate significant resources implementing stand-alone identification systems, including software, hardware and the infrastructure needed to manage the relevant data. A *f*ID system such as that being put in place through the Program would relieve partners of the necessity to put in place and maintain similar, costly systems for specific purposes. Furthermore, the Program represents a critical step in reforming overall country systems and will therefore facilitate additional donor initiatives. While the modernization and digitization of the CR system has been a challenging task in the past, the presence of a *f*ID system would facilitate such an effort. Other initiatives outside of the realm of identification would become more easily achievable as well—for example, e-Governance systems, tax reform and land registration depend on the ability to identify and authenticate individuals.

Table 4: Engagement with Development Partners on the Program[120]

Development Partners	*Domain of Engagement*
French Development Agency (Agence Française de Développement - AFD)	Civil registration; Identification
African Development Bank (AfDB)	Civil registration; Identification (Niger)
African Union (AU)	African Continental Free Trade Area (AfCFTA)
Belgian Technical Cooperation (BTC)	Civil registration
European Union (EU)	Civil Registration; Identification (Burkina Faso)
Food and Agriculture Organization (FAO)	Identification, particularly for vulnerable populations
International Organization for Migration (IOM)	Border security; Migration; ECOWAS
International Telecommunication Union (ITU)	Digital economy
United Nations Conference on Trade and Development (UNCTAD)	Digital transformation, e-commerce
United Nations Economic Commission for Africa (UNECA)	Civil registration
United Nations High Commissioner for Refugees (UNHCR)	Migration; Refugees
United Nations Children's Fund (UNICEF)	Civil registration
World Food Programme (WFP)	Identification, particularly for vulnerable populations
World Health Organization (WHO)	Civil registration and vital statistics

[120] This table serves illustrative purposes, and is not exhaustive of possible existing or future services.

IV. IMPLEMENTATION ARRANGEMENTS

A. Institutional and Implementation Arrangements

73. **Strong institutional anchorage of the project is essential with high-level political will capable of coordinating cross-ministerial engagement.** All participating countries have taken measures to develop an institutional framework on identification. The goal in each case is to establish a dedicated entity registering all persons in the territory of the country and giving them a unique identifier. Linkages with human-capital authorities (Social Protection, Health, Education, Gender, Nutrition, Population) will help achieve the target of facilitating access to services, and increase user demand and, therefore, program success. Structural mechanisms minimizing linkages to security, law enforcement, surveillance, and elections will be constructed from the start, with limited, controlled and permissioned uses governed by the legal regime.

74. **In Togo, the Presidency will have project oversight of the project; its implementation will be carried out by an existing PIU, the World Bank-financed West Africa Regional Communications Infrastructure Project (WARCIP),**[121] **anchored in the Ministry of Digital Economy**. The Project Coordinator will be responsible for project implementation. (*See* Annex 1.)

75. **In Benin, project implementation will be carried out by a PIU in its independent and autonomous *f*ID System Authority (ANIP), which reports to the Presidency**. This independent *f*ID System Authority has the explicit aim of facilitating access to services for all persons. The PIU will principally collaborate with the National Agency for Social Protection (ANPS). A Project Coordinator will be hired, who will be responsible for project implementation. (*See* Annex 1.)

76. **In Burkina Faso, the Office of the Prime Minister (PMO) will have project oversight, with a PIU being created in the PMO.** A Project Coordinator will be recruited or nominated, and will be responsible for project implementation. (*See* Annex 1.)

77. **In Niger, the Presidency will have project oversight, with a PIU to be established within its structure.** The Presidency has nominated the Director General of ANSI as its focal point. A Project Coordinator will be responsible for project implementation. (*See* Annex 1.)

78. **In each country, a cross-cutting Steering Committee, chaired at the highest political level possible, will coordinate key stakeholders across agencies.** The Steering Committee will be a multi-stakeholder coalition to ensure cross-sectoral participation and build reform momentum and buy-in. The objective of the Steering Committee will be to foster open and inclusive institutional arrangements and to develop the engagement between government, people, private sector and civil society to obtain buy-in and set up mechanisms to effectively reach vulnerable groups, and to solve the challenges of fragmentation of different identification approaches across government.

79. **A Technical Committee will be put in place in each country to discuss and validate technical, operational and logistical choices.** The Committee will assemble cross-cutting technical expertise. It will be composed of technical representatives of relevant stakeholders from the government and—based on the points to be discussed—from the

[121] West Africa Regional Communications Infrastructure Project APL 2 - P123093.

private sector, such as the banking and mobile networks operators. Working groups can be created to respond to respond to arising technical, operational and logistical needs.

80. **Additionally, a coordinating Regional Supervision Committee (RSC) will be established, including leadership and representatives from each country to guide regional engagement on the project.** Each country will send a delegation of the Project Coordinator, as well as one legal and one technical expert will attend to ensure ongoing regional dialogue so that policies and protocols are in place to ensure mutual recognition of *f*IDs credentials across countries. The RSC will meet twice a year, including at Program-supported Regional Workshops.

B. Results Monitoring and Evaluation Arrangements

81. **Progress towards the achievement of the overall PrDO will be measured based on the PrDO-level and intermediate results indicators as part of the Program's Results Framework (*see* Section VI)**. Relevant data pertaining to measuring results, including project outcomes and quality of project execution will be collected. The World Bank team will conduct an annual evaluation to review the progress against results indicators, based on data supplied by the PIUs. The Program will undertake a yearly review of the legal and institutional framework in each participating country.

Table 5: Existence of National Legal and Institutional Frameworks for Data Protection, Cybersecurity and Identification

ECOWAS Member State	*LEGAL INSTRUMENT*				*INSTITUTIONAL ARRANGEMENT*			
	Data Protection	*Cyber-security*	*National Identification*	*Foundational Identification*	*Data Protection*	*Cyber-security*	*National Identification*	*Foundational Identification*
Benin	Law *2009, 2017*	Law *2017*	Law *2017*	Law *2017*	HADP *Autonomous*	ANSSI *Presidency*	ANIP *Presidency*	ANIP *Presidency*
Burkina Faso	Law *2004*	Law *2008*	Decree *2001*	×	CIL *Autonomous*	ANSSI *PMO*	ONI *Ministry*	×
Cabo Verde	Law *2001*	Law *2005, 2016*	Law *2014*	×	CNDP *Autonomous*	NNC *Autonomous*	NOSi *Autonomous*	×
Côte d'Ivoire	Law *2013*	Law *2013*	Law *1998*	*[Bill]*	ARTCI *PMO*	ARTCI *PMO*	ONECI *Ministry*	×
The Gambia	×	×	×	×	×	×	×	×
Ghana	Law *2012*	*[Bill]*	Law *2006, 2008*	×	DPC *Autonomous*	NCSC	NIA	×
Guinea	Law *2016*	Law *2016*	×	×	×	ANSSI *Ministry*	×	×
Guinea-Bissau	×	×	Law *1992, 2010*	×	×	×	×	×
Liberia	×	×	Law *2011*	×	×	×	NIR *Autonomous*	×
Mali	Law *2013*	Law *2019*	Law *2006*	×	APDP *Autonomous*	×	CTDEC *Ministry*	×
Morocco†	Law *2009*	Law *2003*	Law *2007*	*[Bill]*	CNDP *Autonomous*	DGSSI *Ministry*	DGSN *Ministry*	×
Niger	Law *2017, 2019*	Law *2019*	Law *2019*	×	HAPDP *Ministry*	×	DGPN & GN *Ministry*	×
Nigeria	*[Bill]*	Law *2007, 2015*	Law *2017*	×	×	NITDA *Ministry*	NIMC *Autonomous*	NIMC *Autonomous*
Senegal	Law *2008*	Law *2008*	Law *2012, 2017*	×	CDP *Autonomous*	×	DAF *Ministry*	×

SIERRA LEONE	×	×	×	×	×	×	×	×
TOGO	Law *2019*	Law *2018*	Decree *2003*	*[Bill]*	IPDCP† *Autonomous*	ANCy *PMO*	DGDN *Ministry*	×

† While Morocco's ECOWAS membership has been approved in principle, it has not acceded to full membership status.
‡ Recently created, these institutions are not yet fully operational.
× Connotes the absence of formal instrument or institution.

82. **Project PIUs will be responsible for developing detailed monitoring and evaluation (M&E) plans, specifying standard protocols and developing guidelines for data collection and use for the duration of the project, as well as organizing trainings for relevant stakeholders in the M&E plan**. Progress reports will be closely reviewed by the multi-sectoral Steering Committees set up in each country. Project PIUs will provide quarterly monitoring tables and progress reports on all PDO- and intermediate-level results indicators, as well as any additional country-level indicators specified in the country projects' respective M&E plans to the World Bank during routine implementation-support missions. The Geo-Enabling Initiative for Monitoring and Supervision (GEMS), along with other geocoding, geospatial mapping and poverty maps, can be used to monitor the progress of the registration sweep and to track grievances. Such tools can pinpoint where registration sites should be setup and to dispatch mobile registration units to remote regions. Systematically collating (gender-disaggregated) registration data from remote/rural areas and urban areas can provide insight into the level of coverage, inclusion and access, especially in poor regions and along borders, and improve the accuracy and efficiency of registration as well as communication campaigns. (*See* Section VI.)

83. **Given the logistical challenges of monitoring progress across the four countries, a firm will be contracted to design the M&E parameters, to implement a system and to guide M&E activities at the regional level**. To ensure data is comparable across countries, the framework, tools and M&E system for data collection and reporting at the regional level on progress of the Program will need to be developed.

C. Sustainability

84. The Program will ensure sustainability by: (i) stimulating user-demand by ensuring that *f*ID credentials contributes to improved and easier beneficiary access to services; (ii) developing the institutional revenue model on the basis of authentication services; and (iii) developing a robust legal and institutional enabling framework.

(i) Stimulating user-demand for *f*ID credentials

85. **For *f*ID systems to be successful, the acceptance and use of *f*ID credentials by a wide range of services—public and private—is critical.** To achieve this, the *f*ID system must serve the identity verification and authentication needs of several service providers, as described in the Phase 1 PAD. Enabling linkages of the *f*ID system to services is addressed through all components of the Program.

(ii) Creating a revenue model on the basis of authentication services

86. **The Program will support the development of an authentication-based revenue model that respects the nature of the *f*ID System Authority as supporting a public good in a service-oriented culture.** That financial model will be elaborated in the course of developing a *National Strategy on Identification for Service Delivery*. The essence of that financial model will be shifting reliance away from the sale of costly "smart" cards and towards an authentication model, where the *f*ID System Authority is paid a small fee by service providers wishing to authenticate the identity of

a service user. There are several examples of the validity of such a model.[122] Through this model, the creation of the *f*ID system should support the State's role in providing a public good through, notably that of developing a platform for assuring all persons have free-of-charge government-recognized proof of unique identity that facilitates their access to services, through a line budget allocation.

87. **Economic sustainability will further depend on the development of a viable financial model for the *f*ID system**. A close analysis of the cost drivers of identification systems across 15 countries has revealed that the two largest cost components tend to be (a) staff costs associated with registration (35 to 65 percent) and (b) costs of issuing credentials (between 10 and 40 percent)[123]:

- ***a. Cost of Registration***: The Program has been designed based on lessons learned from other identification efforts. The initial costs associated with mass registration will be borne by the Program. However, recurring costs done after this initial registration campaign (including day-to-day registration, registry update and maintenance) will be carried out by civil servants and embedded in the existing government budget; and
- ***b. Cost of fID Credential Issuance***: To enable universal access to identification, the Program will support the issuance of low-cost government-recognized credentials that will be free of charge to beneficiaries. Should an additional, higher-cost credential be needed for certain population subsets (*e.g.*, for travel, extended services), those costs will be either supported by other sources of financing or passed on to end-users if appropriate to context.

88. **The Program will develop costed roadmaps for each country and studies to inform the design of their financial models.** Such roadmaps will ensure that the chosen financial model for the *f*ID system is sustainable beyond the life of the Program, both by making cost-effective design choices and by developing relevant revenue streams where possible. The economic and financial analysis further demonstrates the sustainability of the investment.

(iii) Developing a robust legal and institutional enabling framework

89. **The Program will build in sustainability through the creation of a robust legal, institutional and governance framework.** The development of laws and policies will set in place the necessary elements, such as an independent *f*ID System Authority with clearly assigned roles and responsibilities, to ensure the longevity of the *f*ID system. Strong institutional capacity is key to ensuring sustainability. To this end, competitive hiring will be used to ensure that the agency is staffed with those having the appropriate technical capacity and skills. In order to finance the recurrent costs of enrollment, updates and maintenance, through the existing government budget, a memorandum of understanding among government agencies will be devised for data sharing and the like, based on issues such as the authentication of services through *f*ID credentials or UNIs.

[122] World Bank. 2019. *Identity Authentication and Verification Fees: Overview of Current Practices*. *http://documents.worldbank.org/curated/en/945201555946417898/pdf/Identity-Authentication-and-Verification-Fees-Overview-of-Current-Practices.pdf*.

[123] Interestingly, there is a high (approximately 30 percentage point) spread in both these drivers in terms of their contribution to total cost; this variation is typically attributed to a few key design-choice based drivers—the choice of biometrics collected, the enrollment timeline, the technical features of the credential, the number of data fields collected and the level of linkage with the CR system.

V. PROJECT APPRAISAL SUMMARY

A. Technical, Economic and Financial Analysis

90. **The technical design of Phase 2 is aligned with that of Phase 1, adjusted to take into account lessons learnt as described earlier**. It is customized for each country as detailed in the Components section and Annex 2**.**

91. **The appraisal in this section captures: (i) the expected contribution to the socioeconomic development of the countries financed under this phase of the Program; and (ii) regional benefits**.[124] It draws on available evidence on the benefits of robust and inclusive identification systems. Recent studies continue to suggest strongly that social and economic returns justify the significant investment required for the development of *f*ID systems.

92. **The combined benefits to individuals, to the overall economy and to the fiscal situation suggest a high rate of return; however, those benefits are inherently difficult to measure.** According to a 2019 McKinsey study, countries implementing digital identification systems can generate three to 13 percent of GDP by 2030, depending on the share of the economy such issued credentials can address.[125] A *Cost-Benefit Analysis of National Identity Management System Development in Zambia*, the only such study found for a developing country and commissioned by the World Bank as part of its "Support Developing Identification and Registration Systems in Africa" efforts, estimated an internal rate of return ranged from 38 percent to more than 500 percent in the four scenarios presented.

(i) Increased Access to Services

93. **Identification plays a key role in improving access to health, education, social and pension services.** There are a number of examples from across the globe regarding the link between identification systems and improved health service delivery and health outcomes. In Thailand, the Government could identify the population that was not covered by health insurance by cross-checking databases with the NID card. This allowed them to increase coverage from 71 to 95 percent in two years.[126] A recent study found a positive relationship between birth registration and childhood vaccinations in the Dominican Republic.[127] Identification systems can also play an important role in expanding and improving social protection. In Peru, the World Bank partnered with the Peruvian identification agency to register poor children so that they could access cash transfers and nutritional support.[128] In India, a study found that Aadhaar enables more targeted subsidies and expands access to clean cooking fuel for poor rural households, especially women.[129] Conversely, there is evidence that gaps in coverage of social programs are sometimes due to lack of proof of identity. In Nepal, a study found that 12 percent of the elderly could not receive the old-age pension due to their inability to prove their identity and age. Identification can also help build equality for women and girls through increased access to services. Access to identification can enable more girls to enroll in school, women to open a bank

[124] *See* Phase 1 PAD for rationale for use of public sector resources and World Bank value-add.
[125] Bughin, Jacques; Manyika, James; Woetzel, Jonathan, et al.. April 2019. *Digital identification: A key to inclusive growth.* McKinsey Global Institute. *https://www.mckinsey.com/~/media/McKinsey/Business%20Functions/McKinsey%20Digital/Our%20Insights/Digital%20identification%20A%20key%20to%20inclusive%20growth/MGI-Digital-identification-Report.ashx*.
[126] World Bank. 2018. *ID for Healthcare.* Identification for Development. Washington, DC: World Bank Group
[127] Brito, Steve; Corbacho, Ana; and Osorio, Rene. 2017. "Does birth under-registration reduce childhood immunization? Evidence from the Dominican Republic," Health Economics Review, vol. 7, no. 14.
[128] *https://www.reniec.gob.pe/portal/intro.htm*.
[129] Mittal, Neeraj; Mukherjee, Anit; and Gelb, Alan. "Fuel Subsidy Reform in Developing Countries: Direct Benefit Transfer of LPG Cooking Gas Subsidy in India." CGD Policy Paper. Washington, DC: Center for Global Development. *https://www.cgdev.org/publication/fuel-subsidy-reform-developingcountries-india*.

account, access health and other services. There is even research suggesting that having age-verified government-recognized identity credentials can contribute to reducing child marriage.[130] In Pakistan, where registration was linked to the Benazir Income Support Program established in 2008, the number of women with a NID card doubled in the following five years[131], and the number of married women reporting having a CNIC number increased from 82 percent in 2011 to 89 percent in 2013.[132] It resulted in women benefiting from greater access to health services, including reproductive health.[133] Links to social registries, which will facilitate access to services, are anticipated in all four countries, and connection to health service or insurance programs are planned in Togo, Benin and Burkina Faso.

94. **One of the most significant returns from identification systems is that of greater financial and digital access and inclusion.** *f*ID systems can address some of the main barriers to opening a bank account or obtaining a SIM card: lack of necessary documentation and distance from branches. This lack disproportionately affects women. Across lower-income economies, 18 percent of unbanked individuals cite lack of identity credentials as a primary account barrier, with 21 percent citing distance from branches.[134] Without some form of identification that enables providers to authenticate their identity, individuals cannot use formal financial services, including deposit accounts, payment services, and credit. The lack of government-recognized proof of unique identity makes it difficult to fulfill KYC and anti-money laundering requirements or to establish reliable credit histories. Identification-authenticated mobile banking can help address these issues, as well as facilitating remote registration that can bring financial services closer to people. Linkages to ICT and financial services are anticipated in all four countries.

Table 6: Access to Banking and Mobile Phone Services in Phase 2 Countries

	Togo	*Burkina Faso*	*Niger*	*Benin*
People (age 15+) with a bank account[†]	45%	43%	16%	38%
People (age 15+) with a mobile money account[‡]	21%	33%	9%	18%
Unique mobile subscribers[‡]	45%	51%	36%	54%

[†] *Source: World Bank. Global Findex Survey, 2017.*

[†‡] *Source: GSMA Intelligence, 2019.*

95. **Inclusive and trusted *f*ID systems can boost productivity in agriculture through supporting the formal recognition of land ownership**.[135] *f*ID systems could enable land titles that would help farmers to sell or lease land and apply for new lines of credit that could increase investment and output on currently unregistered land. Identification-enabled digital land titling could make formal ownership of assets accessible to a wider range of farmers in emerging countries who currently own land without evidence or registered legal claims. For example, Thailand, Indonesia, and Brazil experienced 30 to 80 percent increases in land values following the rollout of programs that

[130] Hanmer and Elefante, 2016.
[131] World Bank, 2017. Implementation Completion and Results Report, Pakistan: Social Safety Net Project (P103160).
[132] World Bank, 2017. The Impacts of Cash Transfers on Women's Empowerment: Learning from Pakistan's BISP Program. Social Protection & Labor, Discussion Paper No. 1702.
[133] Oxford Policy Management. 2015. Benazir Income Support Programme Second Impact Evaluation Report. *https://www.opml.co.uk/files/Publications/7328-evaluating-pakistans-flagship-social-protection-programme-bisp/bisp-second-impact-evaluation-report.pdf?noredirect=1*
[134] World Bank. Global Findex Survey, 2017.
[135] McKinsey, 2019.

introduced formal land titling. Such programs led to increases in investment levels ranging from 40 to 105 percent in Brazil and Thailand, and increases in credit access from 200 to 350 percent in Brazil and Thailand.[136]

96. **The Program enables the development of adaptive social protection systems that help vulnerable households manage the risks from covariate shocks, such as the current COVID-19 shock**. Adaptive social protection systems underpinned by regionally-interoperable *f*ID systems would help countries address public health crises, such as the current COVID-19 outbreak, and climate-related events, such as droughts, and to quickly scale-up cash transfers via their social safety net programs or other humanitarian support. When everyone, regardless of legal, economic or social status, has a government-recognized proof of unique identity through a *f*ID system, Social Registries in these countries can potentially reach all persons in the country and reliably assess eligibility for social assistance, universal health and other shock-responsive programs, a matter especially challenging in the Sahelian countries. Government-to-person (G2P) payment systems can then transfer benefits, become flexible and shock-responsive, and contribute to digital financial inclusion of the poor and women's economic empowerment.

97. **Mutual recognition of regional *f*ID credentials is core to the objective of the Program and would bring additional benefits to the countries.** The movement of people (and associated financial flows) is relatively high compared to the rest of Sub-Saharan Africa. Intra-regional remittances account for US$6 billion, the equivalent of half of all cross-border remittances in Sub-Saharan Africa. Digital 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, largely a subset of the ECOWAS membership. Early discussions with West African Economic and Monetary Union (WAEMU) indicate interest in leveraging robust ECOWAS-wide interoperable *f*ID systems to allow for eKYC across the sub-region, a matter of increased interest in light of recent efforts on the single-currency agenda for the ECOWAS region. Mutual recognition will particularly facilitate access to markets for smaller countries, helping trade and labor market integration.[137]

(ii) Efficiency Gains to Public and Private Sector

98. **Public and private institutions benefit most from cost savings due to more efficient service provision and from reduced fraud related to benefits, payroll, and taxes**.[138] *f*ID systems reduce administrative and transaction costs, theft and fraud, and compliance costs, as well as liability costs for holding personal data. Onboarding costs and other identity verification or authentication transactions can be substantially reduced. In India, for example, it is estimated the Aadhaar system reduced a typical firm's onboarding cost from 1,500 rupees to 10 rupees.[139]

99. ***f*ID systems can contribute to the economy through increased private sector efficiency, especially in the finance and telecom sectors.** The Zambia study estimated that savings for banks and telecoms from lower costs of eKYC would run into the tens of millions of dollars over the medium term should the new government-recognized unique identity

[136] McKinsey, 2019. *See also* Toulmin, Camilla. 2009. "Securing land and property rights in sub-Saharan Africa: The role of local institutions." Land Use Policy. Feder, Gershon. 2002. "The Intricacies of Land Markets: Why the World Bank Succeeds in Economic Reform through Land Registration and Tenure Security", Queensland Government, Natural Resources and Mines.
[137] Hanmer, Lucia; and Lubega-Kyazze, Jean. 2017. "Opening door: How national IDs empower women cross border traders in East Africa". Blog. World Bank. *https://medium.com/world-of-opportunity/opening-doors-how-national-ids-empower-women-cross-border-traders-in-east-africa-8443c98e2aad*.
[138] McKinsey, 2019.
[139] World Bank. 2018. *Private Sector Economic Impacts from Identification Systems*. Identification for Development. Washington, DC: World Bank Group.

credential be introduced. The existence of a robust system for authentication obviates the need for individual entities or industry associations to set up their own siloed systems, which duplicate costs many times over. Credit rating agencies and micro-finance institutions also stand to benefit from the ability to link unique numbers across databases in order to track credit histories. This can have ripple effects across sectors, acting as a catalyst for other sectors.[140]

100. **Revenue generating opportunities are created through increased customer base, fees for identity related services, and higher consumer retention.** In Pakistan, for example, Telenor, a private-sector mobile data and digital services provider, met national SIM card registration requirements for unique identification through the digital authentication system of the NID system, allowing it to grow its unique-customer base for its Easypaisa payments service to 20 million users. Reciprocally, the growing of Telenor's customer base resulted in important government revenues, as each authentication costs a minimum charge for private sector companies; today, the firm processes amounts to the equivalent of three percent of the country's GDP.

101. **Regional interoperability of *f*ID systems can facilitate regional integration, encourage the movement of people, goods and capital, grow trade and improve security, with benefits accruing to both individual member states and to the ECOWAS region at large.** The Program can have significant benefits for small-scale cross-border trade, often a key source of income and basic commodities for vulnerable groups, including poor women and IDPs, in fragile regions. Control of identity credentials is often a major barrier for small-scale cross-border traders—for example while those who use the Alfalo crossing between Togo and Ghana generally traverse without stopping or showing any identification whatsoever, those at other crossings, such as the Paga border between Ghana and Burkina Faso, are rife with abusive practices by officials charging fees to those seeking to cross without presenting ECOWAS-recognized documentation. Some countries, like Rwanda, have been able to automate certain border controls (so-called "e-gates") to facilitate the movement of small-scale pedestrian traders. Elsewhere, typically where the use of paper identity credentials is frequent, the use of "*jetons*" (or "tokens") is common practice, the issuance of which is fraught with delays, and which also exposes traders, especially women, to harassment. Interventions that help these groups traverse frontiers are expected to have important positive development outcomes, as well as to encourage regional integration. Trade facilitation at national, bilateral, and regional levels would be well served if there were requirements and incentives for this very large group of small scale traders to be recognized through *f*ID credentials, so as to be protected from harassment and be part of a social security network. This measure has the potential to especially benefit border communities, particularly women, many of whom cross a border several times each week, or even repeatedly each day. To expand opportunities for women, the Program could disseminate information about the benefits of having a *f*ID credential for access to services and business expansion; indeed, the Program has already conducted a HCD assessment in Togo with a collective of fisherwomen, as well as on the Togo-Benin border.

(iii) Fiscal Savings and Revenue

102. ***f*ID credentials are likely to generate fiscal savings and revenues.** In Argentina, linking 34 social program databases with a UNI revealed inclusion errors in eligibility of various social programs and led to a reduction in spending of US$143 million over an 8-year period.[141] In 2010, Pakistan launched the Watan Card program in response to devastating floods that displaced some 20 million people (over 10 percent of the country's population), saving an estimated US$378 million. About 40 percent of the initial 2.7 million people that applied were found to be ineligible

[140] McKinsey, 2019.
[141] World Bank. 2018. *Public Sector Savings and Revenue from Identification Systems: Opportunities and Constraints*. Identification for Development. Washington, DC: World Bank Group.

or were duplicate family members.[142] This translates to an estimated savings of some PKR 21 billion (US$248 million in 2010). In 2016, Thailand eliminated 660,000 applicants out of 8.4 million from a cash transfer program aimed at low-income individuals based on cross-checking databases using the UNI, generating savings of US$30-60 million.[143] Additionally, there is the potential for greater knowledge of the tax base which may improve revenue mobilization.

103. **Savings are often found through reducing pension and wage bill costs for the civil service.** The problem of ghost workers and pensioners in the public sector is a common one in Africa. In 2016, Uganda removed around 6,000 ghost workers from its systems, generating savings estimated to be between US$8 and 11 million; as this result was achieved through the use of the NID cards, these savings are "generated" annually. In many countries, there have been one-off biometric censuses which have produced savings, but which allow the problem to emerge again in the future. Nigeria estimated savings from one such effort at US$1.12 billion between 2007 and 2014.[144]

B. Fiduciary

(i) Financial Management

104. **As part of project preparation, a financial management (FM) assessment of the implementing units has been conducted for Togo, Benin, Burkina Faso and Niger**. The objective of the assessment is to determine whether the respective selected implementing entities have adequate FM arrangements to ensure that: (a) project funds will be used for purposes intended in an efficient and economical way; (b) project financial reports will be prepared in an accurate, reliable and timely manner; (c) the project's assets will be safeguarded, and (d) it is subjected to a satisfactory auditing process. (*See* Annex 1 for detailed description.)

105. **Conclusion**: The description of the FM arrangements in the consolidated FM Annex 1 reveals that all the implementing entities have in place basic FM arrangements; however, it is critical that those arrangements are strengthened to comply with minimum requirements under World Bank Policy and Procedure for Investment Project Financing (IPF) operations. The overall FM residual risk rating is Substantial for the abovementioned countries. While all proposed implementing entities—expected to provide support at the beginning—have developed experience in working with World Bank-financed projects, the assessments identified some risks, which if not properly addressed as per the agreed mitigating measures may have an impact on project implementation. Those aspects include for the proposed PIU in Benin: (i) lack of familiarity with IDA procedures for reporting, disbursement arrangements and auditing; (ii) lack of qualified FM staff, including internal auditors; and (iii) lack of FM tools: accounting software, and manuals of accounting procedures and FM.

106. **Going forward, in order to mitigate the fiduciary risk to the extent possible, the following actions will need to be implemented**: (i) recruit dedicated FM specialists for Benin, Burkina Faso and Niger; (ii) recruit accountants to work exclusively on this new project for the four countries; (iii) develop FM manuals of procedures of this new project for the four countries; (iv) recruit internal auditors for Togo, Benin, Niger, and for Burkina Faso; (v) acquire and install computerized accounting systems for Benin, Burkina Faso and Niger, while the PIU in Togo will utilize a multi-site license of the existing accounting software used for UCP-WARCIP-Togo, (vi) agree upon the interim financial report (IFRs) formats for the project's semi-annual reports, and (vii) submit to World Bank non-objection the terms of

[142] Hakeem, Ali Arshad. 2010. "Citizens Damage Compensation Mechanism: National Database and Registration Authority". Presentation by Ali Arshad Hakeem, NADRA chairman, Government of Pakistan.
[143] World Bank. ID4D, *Public Sector Savings and Revenue from Identification Systems*.
[144] Gelb, Alan; and Metz, Anna Diofasi. 2018. *Identification Revolution: Can Digital ID Be Harnessed for Development?.*Washington, DC: Center for Global Development.

references (ToRs) for and subsequently recruit and maintain external auditors for Togo, Benin, Burkina Faso, and Niger.

(ii) Procurement

107. **The Recipients will carry out procurement for the project in accordance with applicable World Bank procedures.** The World Bank's "Procurement Regulations for IPF Borrowers" (Procurement Regulations), dated July 2016 and revised in November 2017 and August 2018 under the New Procurement Framework, and the "Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants", dated 15th October 2006 and revised in January 2011 and as of 1st July 2016 apply for procurement matters.

108. **All goods and non-consulting services will be procured in accordance with the requirements set forth or referred to in the Section VI-Approved Methods: Goods, Works, and Non-Consulting Services of the Procurement Regulations**. The Consulting Services will be procured in accordance with the requirements set forth or referred to in the Section VII-Approved Selection Methods: Consulting Services of the Procurement Regulations, the Project Procurement Strategy for Development (PPSD), and the Procurement Plan, approved by the World Bank. The Procurement Plan, including its updates, shall include for each contract: (i) a brief description of the activities/contracts; (ii) selection methods to be applied; (iii) cost estimates; (iv) time schedules; (v) the World Bank's review requirements; (vi) any other relevant procurement information. The Procurement Plan for each participating country covering the first 18 months of the project implementation has been prepared and agreed during negotiations. Any update of the Procurement Plan will be submitted for the World Bank's approval. The Recipients shall use the World Bank's online procurement planning and tracking tools (STEP) to prepare, clear, and update its Procurement Plans and conduct all procurement transactions.

109. **All procuring entities as well as bidders, and service providers (*i.e.*, suppliers, contractors, and consultants) shall observe the highest standard of ethics during the procurement and execution of contracts financed under the project in accordance with paragraph 3.32 and Annex IV of the Procurement Regulations**. When procurement is done in the national market, as agreed in the Procurement Plan, the country's own procurement procedures may be used with the requirements set forth or referred to in paragraphs 5.3 to 5.6 related to National Procurement Procedures.

110. **Procurement Documents will adopt provisions of World Bank standard procurement documents related to environmental, social (including sexual exploitation and abuse and gender-based violence), health and safety (ESHS) risks and impacts**. This includes codes of conduct that include prohibitions against sexual harassment and sexual abuse.

111. **Procurement assessments were carried out during the preparation of the project. The overall procurement risk under this project is High**. The main risks identified are:

a) Staff involved in the project may not have enough knowledge of the New Procurement Framework (NPF).
b) Procurement staff with the qualification and experience required to effectively implement procurement actions and procedures are insufficient.
c) Inadequate coordination and interaction between beneficiaries and the PIUs may lead to delays in procurement and poor cost projections.
d) Bureaucratic practices and unnecessary control may result in procurement delays affecting project implementation.

e) The procurement in remote and unsecured areas with few bidders can restrict competition and possibly increase prices and collusion risks.
f) Insufficient capacity which can lead to poor contract management.

112. **Overall, all these risks can cause mis-procurement, possible delays in evaluation of bids, and technical proposals leading to implementation delays, poor quality of contract deliverables, and reputational risks to the World Bank and the project**.

113. **The overall procurement risk is *high*, but after the implementation of the proposed mitigation measures below, the risk will be *substantial***. These measures include for each designated implementing agency (a) hiring on a competitive basis, a procurement specialist who is experienced and familiar with World Bank procurement procedures and policies, to be located in each country ; (b) training all project staff involved on the NPF; (c) developing a section on procurement procedures as part of the project implementation manual (PIM) to clarify roles for each team member involved in the procurement process and define the maximum delay for each procurement stage, specifically with regard to review and approval systems, and the signing of contracts; d) develop contract management plans for prior review contracts (and (e) improving the filing system at the new created PIUs level to ensure compliance with the World Bank procurement filing manual.

114. **The Project Procurement Strategies for Development (PPSD) and the Procurement Plan detailing the first 18 months of implementation have been prepared by the Borrowers and submitted to the World Bank**. The project envisages several complex procurements such as Information Systems and IT equipment that could be challenging in the context of the project. During implementation, the project will facilitate the development of a regional procurement strategy and approach. The main procurement activities include: large contracts of IT systems (population registration services to collect demographic and biometric data for the *f*ID system, implementation and maintenance of the *f*ID system), goods and consultants' services. The different approaches, selection methods, need for pre-qualification, estimated costs, prior review requirements, and time frame are agreed between the recipient and the World Bank in the Procurement Plans. The initial Procurement Plans were approved by the World Bank during the negotiations. During implementation, the Procurement Plans will be updated as required and at least annually, to reflect actual program implementation needs and improvements in institutional capacity.

115. **Special Considerations**: As certain countries of the project are affected by the insecurity and fragility situation, the project will trigger on case by case basis, the paragraph 12 of the Policy for IPF in order to apply flexibilities and simplification to facilitate procurement implementation. These procurement arrangements will draw on the World Bank Guidance on Procurement Procedures in Situations of Urgent need of Assistance or Capacity Constraints issued on March 7, 2019. These measures include the use of Borrower's national procurement provided the arrangements are consistent with the World Bank's Core Procurement Principles. The simplified procurement arrangements will be detailed on the procurement section of the PIM. Burkina and Niger will review the possibility of using Hands-on Expanded Implementation Support (HEIS).

C. Legal Operational Policies

	Triggered?
Projects on International Waterways OP 7.50	No

Projects in Disputed Areas OP 7.60	No

D. Environmental and Social Safeguards

116. ***f*ID systems are expected to have substantial socio-economic benefits as they facilitate universal access to public and private services**. In addition, *f*ID credentials that are mutually recognizable across ECOWAS Member States will expedite travel, limit costs (to both the state and the individual), cut down on corruption and harassment and help combat human trafficking. *f*ID credentials will eventually facilitate service access and delivery across the ECOWAS region. In this regard, the benefits will be particularly evident for cross-border traders and those residing in border regions.

117. **By promoting universal coverage, the *f*ID system will help to break patterns of exclusion and discrimination, especially for women and girls and for the historically marginalized**. Due attention will be given throughout the identity life cycle (*see* Annex 2) to ensuring that vulnerable groups are included, and that discrimination is actively combated. Vulnerable groups in each country are being identified through stakeholder consultations and targeted outreach activities. These will incorporate tailored measures to remove obstacles—logistical, cost (including indirect fees), distance—to assure universality. Approaches such as home-based registration and mobile registration units can help reach the elderly, women, persons with disabilities and the illiterate, as well as those living in remote and isolated communities. Special attention will be given to ensuring accessible, culturally-sensitive implementation, with efforts supported through strong collaboration with national human right bodies, local civil society organizations, women's organizations and international non-governmental organizations and agencies (IOM, UNICEF, UNHCR, WFP). Further, risks of exclusion will be managed through (i) training registration teams, at all levels, in non-discrimination and cultural awareness and sensitivity; (ii) culturally appropriate and targeted public information and awareness campaigns to inform users of their rights, the benefits and importance of registration each individual within a household; (iii) development of a non-discrimination policy and enabling regulation by the relevant national identification agency; and (iv) development of strong GRMs. These measures will be monitored through a set of stakeholder engagement indicators as part of the Results Framework and M&E system.

118. **Understanding barriers at the individual and community level is paramount to guaranteeing universal inclusion**. Early findings from qualitative research in Nigeria indicate that it is important for community leaders to convince men to support and encourage registration of female members of their households and that indirect costs (e.g. transport) and long wait times or multiple visits to registration create especially high barriers for poor women. Qualitative research in Phase 1 and the ongoing social assessments for Côte d'Ivoire and Guinea have also provided some important insights into motivations and disincentives for registration. These will inform the national-level Environmental and Social Assessments and Management Plans (ESAMPs) that will be prepared during implementation, to inform the design of the *f*ID systems under Component 2 and provide a roadmap for the overall implementation of the project.

119. **Stakeholder engagement, awareness campaigns and social accountability measures are integral to project success**. In each country, the PIU will be responsible for developing national, project-specific, Stakeholder Engagement Plans (SEP), drafts of which have been prepared during appraisal. To coordinate and implement the social risk management activities and instruments, the PIUs will each recruit one full-time, senior social development specialist and one support staff. Additionally, each PIU will ensure that the views of direct project beneficiaries have been

accounted for in project M&E and that an independent third party is retained to monitor implementation and ensure inclusion.

120. **The project will develop GRMs to respond to queries or clarifications, resolve problems with implementation and efficiently and effectively address complaints**. The GRMs will (i) be responsive to the needs of beneficiaries; (ii) serve as a channel for soliciting enquiries, inviting suggestions and increasing participation; (iii) collect information to improve operational performance; (iv) enhance project legitimacy among stakeholders; (v) promote transparency and accountability; (vi) deter fraud and corruption; and (vi) mitigate project risks. Where possible, GRMs will be technology-enhanced using hotlines, mobile apps, text messaging and social media channels.

121. **Regarding data protection and privacy, the Program structurally limits concerns about the improper use, or sharing of, data leading to discrimination or persecution**. *f*ID systems will only collect and manage a very limited data set. Data collected for the *f*ID system will be extremely limited and will not include any socio-economic or demographic data. Furthermore, the assigned UNI will be unique, random and unintelligible. These systems will also be accompanied by strong legal and institutional controls. Further, WURI will support capacity-building activities for data protection authorities.

122. **No civil works will be financed, and no land acquisition is expected. Therefore, the Environmental and Social Standard (ESS) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5) does not apply**. ESS7 is not currently relevant to the project as the Program is not being implemented in areas where Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities (IP/SSAHUTLCs) are present or in areas to which they have collective attachment. Should the presence of indigenous communities be confirmed through further screening during project implementation, the project will address any risks posed to them and measures will be put in place to ensure that they are included in the Program, per the requirements of ESS7. The stakeholder engagement plan is inclusive, with a robust approach to reach out to all communities in the countries, especially those that are historically marginalized and thus at risk of not participating in the Program.

123. **The Program is expected to have minimal to no adverse environmental impacts as no civil works are financed. Limited physical investments will be made to set up data centers and *f*ID system infrastructure at national levels including servers, computers and tablets.** Therefore, energy efficiency, e-waste handling and disposal might be relevant and will be assessed and managed according to requirements of ESS1 and ESS3 of the ESF and World Bank Group (WBG) General EHS Guidelines. The Program is not a significant user of water or other raw materials. The Program is not a significant greenhouse gas (GHG) emitter and therefore no GHG emission estimation is required. Phase 1 was rated as Safeguards Category B, consistent with the provision of OP/BP 4.01 Environmental Assessment due to social risks.

124. **The four countries have prepared and disclosed Environmental and Social Commitment Plans (ESCP), SEP and Labor Management Plans (LMP)**. The countries have also prepared ToRs for environmental and social assessments which have been disclosed. These assessments will be prepared, consulted upon, cleared by the World Bank and disclosed in-country and at the World Bank's website. They will be used to inform the project about social risks and, as and when necessary, the program will include measures to address these risks.

VI. GRIEVANCE REDRESS SERVICES

125. Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's Grievance Redress

Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit: *http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service*. For information on how to submit complaints to the World Bank Inspection Panel, please visit *www.inspectionpanel.org*.

VII. KEY RISKS

126. **The Program's overall risk remains *High***. Table 7 presents risks by category of the Systematic Operational Risk-Rating Tool (SORT). Primary risks arise from: (i) disruptions caused by electoral activities and sector governance; (ii) sector strategies and policies related to identity credentials, including the absence of strong data protection and privacy frameworks; (iii) technical design; (iv) low institutional capacity for implementation; (v) stakeholders' differing incentives and priorities; and (vi) existing private sector practices.

Table 7: Risk Rating

Risk Categories	*Rating*
Political and Governance	High
Macroeconomic	Moderate
Sector strategies and policies	High
Technical design of project or program	High
Institutional capacity for implementation and sustainability	High
Fiduciary	Substantial
Environment and social	Substantial
Stakeholders	High
Other: Lack of Technology Neutrality and Vendor Lock-in	High
OVERALL	**HIGH**

127. **Political and Governance risks are *High***. As the identification agenda is closely intertwined with questions of inclusion, recognition, and access, it is inherently political. The experience in Côte d'Ivoire in Phase 1 has shown that these aspects become particularly apparent in (pre-)electoral periods, in which the attribution of (national) identity credentials becomes directly associated with the right vote or the right to register for voter rolls. The Program will therefore have to carefully monitor activities undertaken in preparation of the elections and how these influence the overall identification landscape and WURI implementation. It has been communicated clearly to counterparts that Program financing is not intended to, and cannot be used to contribute to, the preparation of voter registries.

128. **Another important political and governance risk arises from the institutional arrangements and oversight associated with the identification agenda**. With the primary purpose of facilitating delivery of human capital and financial sector services, the *f*ID system seeks application in a wide variety of sectors. Thus, governance and institutional arrangements will be developed under the auspices of a transversal actor, and ideally creating an independent, dedicated *f*ID System Authority to coordinate in the longer term. Moreover, the Program will continue to raise awareness of the authorities at every level of the project objectives and the focus on access to services, provide capacity building on data management and data privacy, and ensure close monitoring of implementation.

129. **Insecurity provides significant risks to project implementation, particularly in the context of Burkina Faso and Niger**. Terrorist activities, inter-community conflict and resulting displacement of large parts of the population have made service delivery challenging in certain regions. The Program will consider, if necessary, partnerships with local actors and third-party implementers in insecure zones, including with UN actors such as UNHCR and others who maintain a presence on the ground in insecure areas and local actors who could support some level of continued implementation and monitoring in those areas, as well as the use of digital technology. The project will also take into

account security costs and resources needed to allow implementation in these areas, and work closely with the government to ensure the security of project areas.

130. **Sector strategy and policy risks are *High*.** Conceiving of identification systems as foundational platforms that enable anyone physically present in a country's territory to authenticate themselves and to access services is a novel approach. Many countries have been creating functional, sectoral identification systems that duplicate processes with data already stored elsewhere. Convincing stakeholders of the benefits of a foundational platform whereby sectoral applications become modules that complement the *f*ID system has proven challenging in Phase 1 and will continue to be challenging. Identification needs to be communicated and well understood as a cross-cutting function that is not limited to any particular sector.

131. **Technical Design risks are *High***. Previous data collection exercises and identification initiatives in the region have often been characterized by a lack of interoperability and integration. Further, the market for identification systems in Africa is dominated by a small number of vendors whose solutions have often involved proprietary elements, which have contributed to vendor lock-in and narrowed competition in the market, resulting in the implementation of excessively costly, siloed systems (*see* Other Risks.)[145] The introduction of a foundational platform emphasizing free credentials and the use of open technologies and interoperability could challenge current industry practices. To mitigate this risk the Program will thoroughly assess the existing identification landscape and obtain government commitment to ensure an open, vendor-neutral and inclusive system architecture. Regional dialogue and partnership will be critical in this regard.

132. **Institutional capacity for implementation risks are *High***. As the Program combines challenging technical architecture with a complex political and stakeholder environment, PIUs and *f*ID System Authorities need to combine technical expertise with political savvy. Long-term institutional arrangements need to be defined. The Program will ensure continuous implementation support, relevant knowledge-sharing and training of counterparts.

133. **Fiduciary risks are *Substantial***. Given the intricate design and the fact that large and technically complex procurement packages are foreseen under the implementation, diligent fiduciary management will be crucial for program success. As a result, the Program will insist on strong fiduciary capacity among *f*ID System Authority.

134. **Social risks are *Substantial***. Historically, one of the reasons identification systems have contributed to exclusion is the conditioning of registration on an applicants' ability to prove their nationality or legal status, as well as registration practices that made registration prohibitively difficult, especially for members of vulnerable groups. The *f*ID system's approach of de-linking unique identification from legal status and minimizing documentary requirements for registration as well as the number of data fields collected, will promote universal accessibility to government-recognized identity credentials. In addition, exclusion risks will be identified and addressed through extensive stakeholder consultations, which will aim to expose existing and potential barriers to accessing identification and explore attitudes towards privacy, freedom of movement and access to services. These will all be gender-informed. Strong public awareness campaigns, tailored outreach strategies, an inclusive and transparent communications plan, a robust GRM and continuous stakeholder engagement will further help manage this risk. Another potential risk relates to privacy and data abuse. The Program structurally limits concerns about the improper use or sharing of data leading to discrimination or targeted persecution by, first, the limited data in the *f*ID system and, second, the development of

[145] Piccolino, Giulia. 2015. *What other African elections tell us about Nigeria's bet on biometrics*. Washington Post. *https://www.washingtonpost.com/news/monkey-cage/wp/2015/03/10/what-other-african-elections-tell-us-about-nigerias-bet-on-biometrics/*.

strong legal and institutional controls. Where the data protection framework is less robust, third party monitoring will be considered as a risk mitigation measure.

135. **Stakeholder risks are *High***. Since identification touches many aspects of daily life and is relevant for many sectors of the economy, stakeholder interest in this agenda is high. Risks include resistance and non-participation from sectorial government ministries; exclusion and potential security risks to vulnerable populations, as well as data protection and privacy risks to registered individuals. Overall, the Program will require targeted communications campaigns as well as continuous and adapted stakeholder engagement, and strengthening of the legal frameworks. By engaging government stakeholders through Steering Committees, workshops and other means, and anchoring the project in a dedicated agency attached to a high-level, cross-cutting stakeholder such as the Presidency, the PMO or the Ministry of Finance, the Program seeks to ensure a whole-of-government approach.

136. **Other risks related to technology neutrality and vendor lock-in are *High***. As highlighted in Phase 1, proprietary systems and a lack of interoperability carries a significant risk of creating dependencies on specific technologies and vendors (so-called "vendor lock-in"). While there are increasingly initiatives to move towards open and interoperable technologies and a completely open source identification solution is now available, there is still a heightened risk for countries to find themselves in situations of vendor lock-in. To mitigate this risk, the Program will continue to sensitize stakeholders and carefully assess procurement packages.

137. **To mitigate overall risks, the Program will continue to follow a flexible, modular approach**. The sequencing of Components and of activities will be adapted to the different country contexts to allow reacting to existing technological solutions and legal and institutional frameworks, different levels of capacity, and different political economy environments. Continuous, regional exchanges will make sure that while each country follows its own trajectory, the objective of regional interoperability is attained.

138. **Although the risks of engaging on this agenda are non-trivial, the benefits are significant and the risk of not engaging might be even greater.** Identification is a core function of government, and one that is necessary for delivering a diverse range of services, including social protection, financial inclusion, health, humanitarian assistance and digital development, to name but a few. Cognizant of the need for identification for service delivery and driven by other motives such as insecurity in certain regions, African governments have increasingly carried out identification initiatives in recent years, most often with limited financial resources and technical capacity. As a result, these systems have tended to be expensive, narrow in scope and sometimes exclusionary.[146] Furthermore, weak data protection and privacy regimes have created substantial risks for individuals providing sensitive information to vendors, governments and other stakeholders. The Program can support the governments of Togo, Benin, Burkina Faso and Niger to put in place robust, secure and inclusive *f*ID systems for service delivery.

[146] Public private partnerships whereby revenue is generated by charging beneficiaries, including the poorest and most vulnerable, for sophisticated cards while guaranteeing exclusivity to specific vendors are common place.

VIII. RESULTS FRAMEWORK AND MONITORING

Results Framework

COUNTRY: Western Africa

West Africa Unique Identification for Regional Integration and Inclusion - Phase 2

Project Development Objective(s)

Increase the number of persons in the Togolese Republic, Republic of Benin, Burkina Faso and Republic of Niger, who have government-recognized proof of unique identity that facilitates their access to services.

Project Development Objective Indicators

Indicator Name	DLI	Baseline	End Target
Legal Robustness			
The enabling legal and institutional framework for the development and support of the fID system is in place (Text)		No	Yes
Technical Robustness			
Existence of a fID system which generates UNIs and is in alignment with international good practices (Text)		No	Yes
Inclusion and Coverage			
Number of direct project beneficiaries who have received a UNI (of which, women) (Number (Thousand))		0.00	65,000.00
Access to Services			
Number of national or regional functional public and private services linked to the fID system (Number)		0.00	4.00

Intermediate Results Indicators by Components

Indicator Name	DLI	Baseline	End Target
Technical Robustness			
The fID system is operational and ready for roll out (Yes/No)		No	Yes
Percentage of individuals in the fID system whose biometric and demographic data meet international quality standards (Percentage)		0.00	100.00
Legal Robustness			
The law for the fID system has been adopted, establishing, inter alia, inclusivity for all persons in the country, issuance of UNIs, linking to the CR system, and assuring data protection and privacy (Yes/No)		No	Yes
Inclusion and Coverage (incl. stakeholder engagement)			
Percentage of newborn birth registrations that are assigned UNIs (of which, girls) (Percentage)		0.00	80.00
Regular consultations held with beneficiaries, ID stakeholders, vulnerable groups and government to solicit feedback and report on actions taken to address feedback since prior consultations (Yes/No)		No	Yes
Percentage of grievances responded to and/or resolved within the stipulated service standards for response times (Percentage)		0.00	90.00
Access to Services			
Number of digital authentications made per month by service providers on behalf of their beneficiaries or clients (of which, women) (Number)		0.00	3,200.00
Regional Integration			
Agreement among (at least 2) countries on mutual recognition of UNIs (Yes/No)		No	Yes
Number of programs that are cross-border users of the fID system from a participating country (Number)		0.00	4.00

Monitoring & Evaluation Plan: PDO Indicators					
Indicator Name	**Definition/Description**	**Frequency**	**Datasource**	**Methodology for Data Collection**	**Responsibility for Data Collection**
The enabling legal and institutional framework for the development and support of the fID system is in place	Adoption of data protection, cybersecurity, and identification legal instruments and existence of mandated and operational institutional arrangements (Options: no / partially / yes)	All: Annual	All: National gazette / Government website	All: On publication	All: PIU
Existence of a fID system which generates UNIs and is in alignment with international good practices	Existence of a fID platform that generates UNIs and is developed in alignment with international good practices including the Principles on Identification for Sustainable Development ("ID4D Principles") of 2018. (Options: no / partially / yes)	All: every 6 months	All: PIU	All: PIU reporting	All: PIU
Number of direct project beneficiaries who have received a UNI (of which, women)	The total number of persons who have received a UNI (of which women)	All: Every 6 months	All: Monitoring dashboard of fID system	All: BI report	All: PIU

Number of national or regional functional public and private services linked to the fID system	The total number of public and private services that are linked to the fID system	All: Every 6 months	All: Monitoring dashboard of fID system	All: BI report	All: PIU

Monitoring & Evaluation Plan: Intermediate Results Indicators					
Indicator Name	**Definition/Description**	**Frequency**	**Datasource**	**Methodology for Data Collection**	**Responsibility for Data Collection**
The fID system is operational and ready for roll out	The fID system is in production.	All: Every 6 months	All: Monitoring dashboard of fID system	All: BI report	All: PIU
Percentage of individuals in the fID system whose biometric and demographic data meet international quality standards	The percentage of individuals that are registered in participating countries' fID systems whose biometric and demographic data meet ID4D and ECOWAS technical standards	All: Annual	All: Monitoring dashboard of fID system	All: BI	All: PIU
The law for the fID system has been adopted, establishing, inter alia, inclusivity for all persons in the country, issuance of UNIs, linking to the CR system, and assuring data protection and privacy	The adoption of a law for the fID system that establishes, inter alia, inclusivity for all persons in the country, issuance of UNIs, linking to the CR system, and assures data protection and privacy	All: Annual	All: National gazette / government website	All: Publication	All: PIU
Percentage of newborn birth registrations that are assigned UNIs (of which, girls)	The percentage of total newborn birth registrations	All: Every 6 months	All: Monitoring dashboard	All: BI report	All: PIU

	that are assigned UNIs (of which, girls)		of fID system		
Regular consultations held with beneficiaries, ID stakeholders, vulnerable groups and government to solicit feedback and report on actions taken to address feedback since prior consultations	A consultation is held with beneficiaries, ID stakeholders, vulnerable groups, women's organizations and government at least once per semester to solicit feedback and report on actions taken to address feedback	All: Every 6 months	All: Attendance lists ("fiche de présence")	All: PIU report	All: PIU
Percentage of grievances responded to and/or resolved within the stipulated service standards for response times	The percentage of grievances that have been responded to and/or resolved within the stipulated service standards for response times	All: Every 6 months	All: Monitoring dashboard of GRM system	All: BI report	All: PIU
Number of digital authentications made per month by service providers on behalf of their beneficiaries or clients (of which, women)	The number of digital authentications per month made by service providers per month on behalf of their beneficiaries or clients (of which, women)	All: Every 6 months	All: Monitoring dashboard of fID system	All: BI report	All: PIU
Agreement among (at least 2) countries on mutual recognition of UNIs	Existence of an MOU or other legal agreement among at least 2 participating countries on mutual recognition of UNIs	All: Annual	All: Government website	All: PIU report	All: PIU
Number of programs that are cross-border users of the fID system from a	The number of (private or public) programs that are	All: Annual	All: Monitoring dashboard	All: BI report	All: PIU

participating country	cross-border users of the fID System from a participating country		of fID system		

ANNEX 1: IMPLEMENTATION ARRANGEMENTS AND SUPPORT PLAN

COUNTRY: Western Africa

West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program - Phase 2

A. Strategy and Approach for Implementation

1. **At the country level, implementation will be carried out by PIUs.** Each country will separately design and develop specific *f*ID system implementation arrangements and components of the project. Depending on each country assessment, the project will either rely on an existing PIU of another World Bank-financed project, or create a new PIU. Each country PIU will need key personnel, hired based on the recommendations of the FM, procurement and safeguards assessments. In order to ensure project sustainability, the PIU will bring experienced staff and capacity to ensure cross-cutting implementation of the identification agenda, as well as lessons learned from Phase 1 experiences.

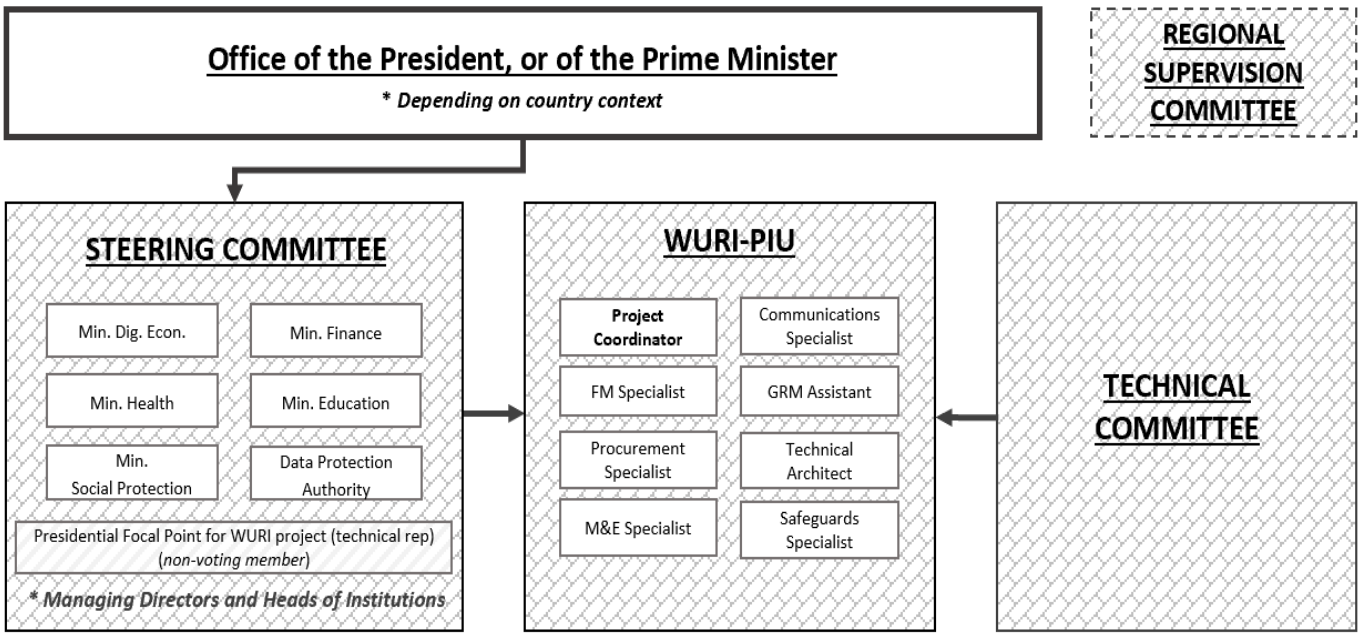
2. **In order to ensure outreach and registration in remote and hard-to-reach areas, project implementation arrangements will also include modalities for registering people through the use of national, sub-national or local actors.**[147] Inability to reach people and to register them can be a binding constraint on inclusion, which could hamper project scale-up and the attaining of national scope and universal coverage. The project's implementation arrangements will aim to increase the number, training and skills of frontline agents or mobile teams to carry out registration tasks and to visit local communities where there is little-to-no local government presence. Such a network would be of particular importance in ensuring inclusion and registration of people in the Sahel and areas under stress of fragility, conflict or violence.

3. **For each country, a high-level, transversal Steering Committee for the project will address coordination challenges through a whole-of-government approach, with a supporting Technical Committee for addressing technical and operational matters**. Based on lessons learned from Phase 1, a cross-cutting Steering Committee guiding the course of the project is a key institutional piece to project success, and is especially helpful in convening all stakeholders, drawing together necessary competencies and resolving any issues that might arise among peer-level actors related to the management and implementation of the *f*ID system. Each Steering Committee will be composed of appropriate ministry and agency heads, and capable of making decisions, including on (i) issues of data sharing among respective sectoral systems; (ii) establishing policy positions on the management of the *f*ID system; (iii) creating a division of labor between different levels and agencies of government; and (iv) incorporating and integrating uncoordinated and fragmented identification approaches. Depending on the context, the Steering Committee will be composed of the representative heads of ministries charged with Finance, Digital Economy, Social Protection, Health, Education, the data protection authority, and other service providers with an interest in the identification for service delivery agenda. For more granular, operational matters, a Technical Committee, convening with greater frequency than the Steering Committee, will be tasked with resolving issues such as enterprise architecture and interoperability, harmonization of data, and definition- and standard-setting, and will be used to discuss and validate technical, operational and logistical choices. On the basis of the inputs of the Technical Committee, the Steering Committee will make strategic policy, operational and technical decisions. Implementation of the recommendations and decisions from these Committees will be done through the PIU. These institutional arrangements will likely require time and

[147] Subnational actors may include the administrative branches of states, regions, or provinces. Local actors may include municipal administrative offices, local offices of the central agency, specialized local offices, and mobile teams. Depending on the country context, registration may be outsourced to specialized providers, such as foundations or non-governmental organizations, private contractors, payment agents, specific service providers (such as training institutes, child care providers, shelters or other protective services), and other actors.

continued engagement to become established, and attention will be needed to ensure that neither Committee becomes a mere procedural venue where there is debate but little action, existing only because it is "required" by the project. (*See* Figure 2.)

Figure 2: Generic PIU and Structural Arrangements for each Project[148]



4. **At the regional level, a coordinating Regional Supervision Committee (RSC) will be established, including representatives from each country to guide regional engagement**. The RSC will ensure ongoing regional dialogue so that policies and protocols are in place to ensure mutual recognition of *f*ID credentials across countries. For RSC meetings, each country will send a delegation of composed of the Project Coordinator, as well as one legal and one technical expert. The RSC will meet twice a year, including at Program-supported Regional Workshops.

5. **To put in place implementation arrangements, participating countries can make use of retroactive financing; Togo also benefits from a project preparation advance (PPA).** For each country, eligible expenditures incurred on or after January 1, 2020 until the date of effectiveness, and up to an amount of SDR 728,000 (US$1 million equivalent), will be eligible for retroactive financing. Togo furthermore has been provided with a PPA of US$3 million equivalent for preparatory activities.

(i) Togo

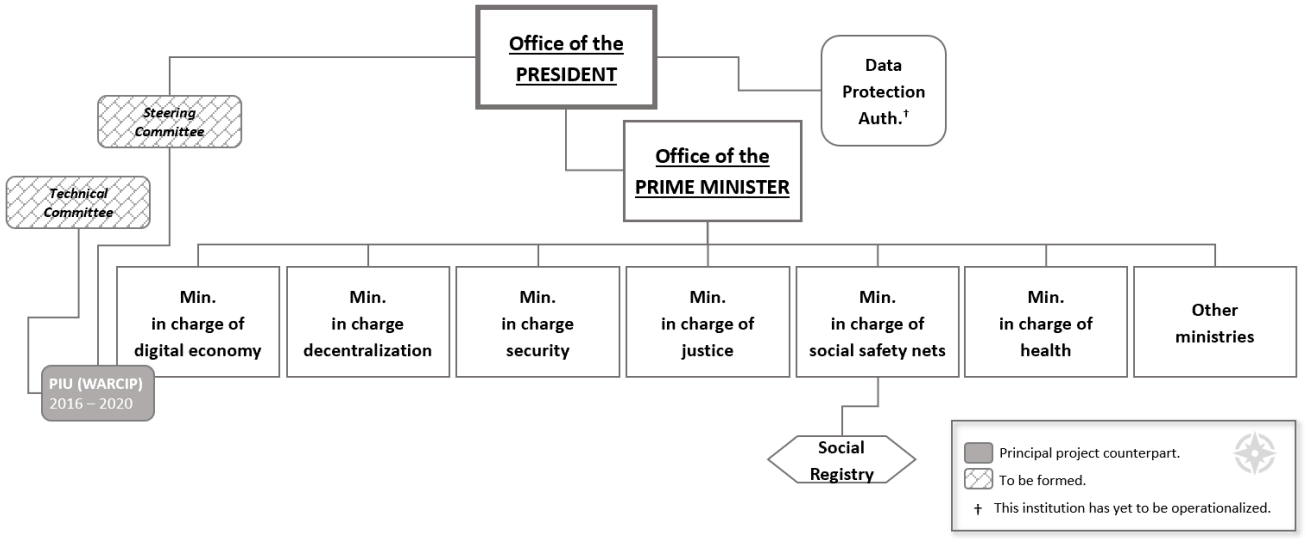
6. **In Togo, the Presidency will have project oversight, with project implementation being done through an existing PIU anchored in the Ministry of Digital Economy**. Project implementation will be undertaken by the World Bank-WARCIP[149], led by a Project Coordinator, and include maintaining of the existing FM Specialist and Procurement Specialist, and a Technical Architect and a Senior Environmental and Social Development Specialist with experience in GRM and consultations, to be in place within one month of effectiveness; an M&E Specialist and GRM Assistant, to be in place within three months of effectiveness; and an Accountant and a Communications Specialist, to be in place

[148] This schematic is general and indicative, with precisions to be determined on a country-by-country basis.
[149] West Africa Regional Communications Infrastructure Project APL 2 - P123093.

within six months of effectiveness. The PIU will report to a Steering Committee that makes strategic decisions, upon which the PIU will act. The Project Coordinator will be responsible for project operations, results and achievement of dated covenants; make periodic presentations to the Steering Committee on project operations and progress; recommend strategic issues to the Steering Committee for discussion and decision; validate the project's Annual Work Plan and Budget (AWP&B) with the Technical Committee and put them forward to the Steering Committee for review and approval. The PIU will also work with the ministry in charge of social protection to provide unique identifiers to the Social Registry information system in order to deliver on Component 3 of the project. The Government will prepare specific budget allocations for WURI in order to sustain the project. (*See* Figure 3.)

Figure 3: Institutional Arrangements in Togo

The Office of the President to oversee the Project through a focal point, supported by a PIU in the Ministry of Digital Economy.



7. **Charged with defining the larger dimensions of the *f*ID system, the Steering Committee will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions.** The Steering Committee and the Technical Committee will both be established within three months of effectiveness. The Technical Committee will provide key technical and operational inputs necessary for the *f*ID system. The Technical Committee will give inputs to the PIU in order to facilitate its preparation of technical and operational documents.

8. **The Presidency's involvement is to assure the transversality and to oversee the project**. Following review by the Steering Committee, the Presidency will, through a focal point, have final approval of (i) the project's AWP&B, which are first formed and recommended to the Steering Committee by the PIU; (ii) the *f*ID system design and implementation, as recommended by the PIU on the basis of the Technical Committee's recommendations; and (iii) the elaborated *National Strategy on Identification for Service Delivery*, as developed by the PIU on the basis of inputs and recommendations from all stakeholders. The focal point in the Presidency will work along with the Project Coordinator of the PIU. The focal point will participate in the Steering Committee as a fully participating non-voting member, and will be a member of the Technical Committee.[150]

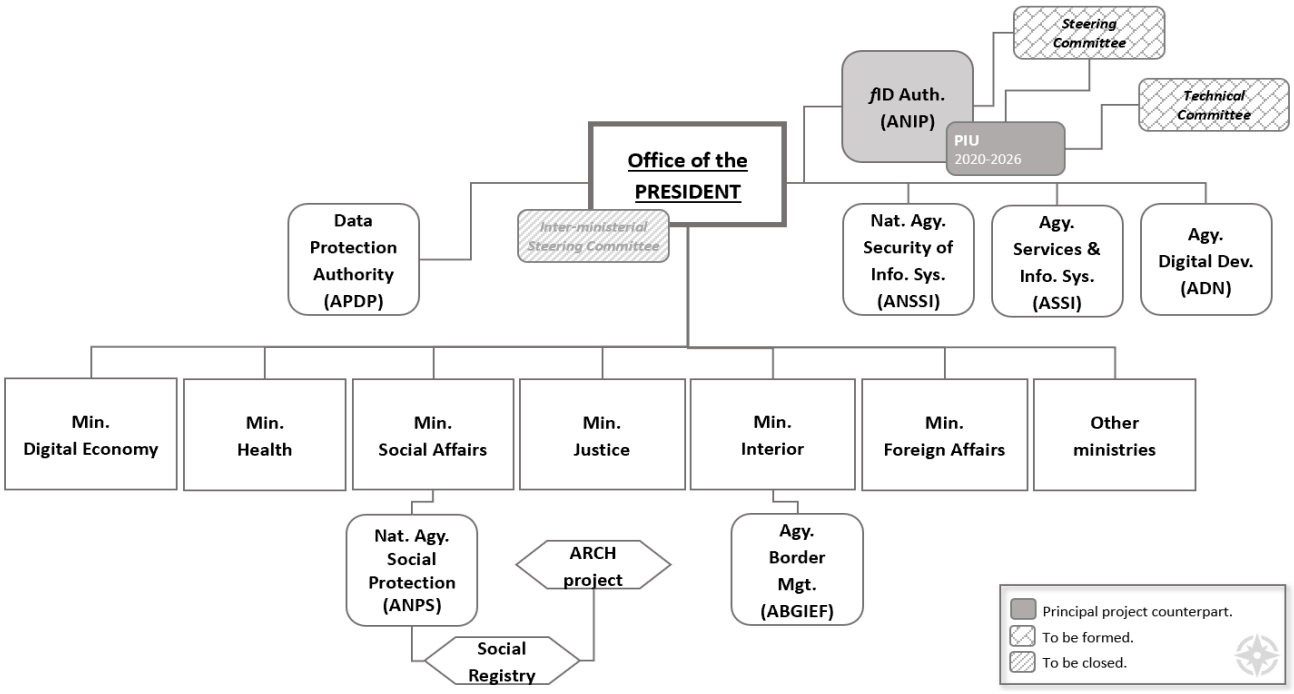
[150] In the instance that a representative of the Presidency chairs the Steering Committee (which would make it analogous to the other countries), then the Presidency would not have the stated final approval.

(ii) Benin

9. **Benin has taken measures to assure institutional anchorage of the project in an independent *f*ID System Authority (ANIP), which reports to the Presidency and which benefits from institutional autonomy and independence.** Project implementation, including fiduciary management, will be carried out by a new PIU to be set up in ANIP, led by a Project Coordinator, and include a Technical Architect and a Senior Environmental and Social Development Specialist with experience in GRM and consultations, to be in place within one month of project effectiveness; an FM Specialist, a Procurement Specialist, an Accountant, an M&E Specialist and a GRM Assistant, to be in place within three months of effectiveness; and a Communications Specialist, to be in place within six months of effectiveness. The PIU will collaborate closely with service delivery authorities, as well as with competent agencies, including ANPS, ANSSI, the Agency for Services and Information Systems (ASSI), the Agency for Digital Development (ADN) and the Ministry of Digital Economy, as well as with the ministries of social affairs, health and foreign affairs. Under the project, ANIP is responsible for fiduciary management and will work closely with the ANPS to deliver on Component 3 of the project, including *f*ID system interoperability with service delivery. While the PIU will implement, it will work closely with a Steering Committee that makes strategic decisions. The Project Coordinator will be responsible for project operations, results and achievement of dated covenants; make periodic presentations to the Steering Committee on project operations and progress; recommend strategic issues to the Steering Committee for discussion and decision; prepare the project's AWP&B with the Technical Committee and put these forward to the Steering Committee for review and approval. The Government will include dedicated budget for ANIP, as well as specific budget allocations for WURI in order to sustain the project. (*See* Figure 4.) This budget is spread across the duration of the project and is to be determined on an annual basis.

Figure 4: Institutional Arrangements in Benin

The Office of the President to oversee the Project through a focal point, supported by a PIU in the independent fID System Authority (ANIP).



10. **The Steering Committee will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions.** Chaired by ANIP and composed of the heads of the chief stakeholders, the Steering Committee will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions. The Technical Committee will provide key technical and operational inputs necessary for the *f*ID system, and will give inputs to the PIU in order to facilitate its preparation of technical and operational documents. The Steering Committee and the Technical Committee will be established within three months of effectiveness.

11. **The Presidency's involvement is to assure the transversality and to oversee the project.** Following review by the Steering Committee, the Presidency will, through a focal point, have final approval of the Steering's Committee's review of (i) the project's AWP&B, which are first formed and recommended to the Steering Committee by the PIU; (ii) the *f*ID system design and implementation, as recommended by the PIU on the basis of the Technical Committee's recommendations; and (iii) the *National Strategy on Identification for Service Delivery*, as developed by the PIU on the basis of inputs and recommendations from all stakeholders.[151] The focal point in the Presidency will work with the Project Coordinator of the PIU. The focal point will participate in the Steering Committee as a fully participating non-voting member, and will be a member of the Technical Committee.

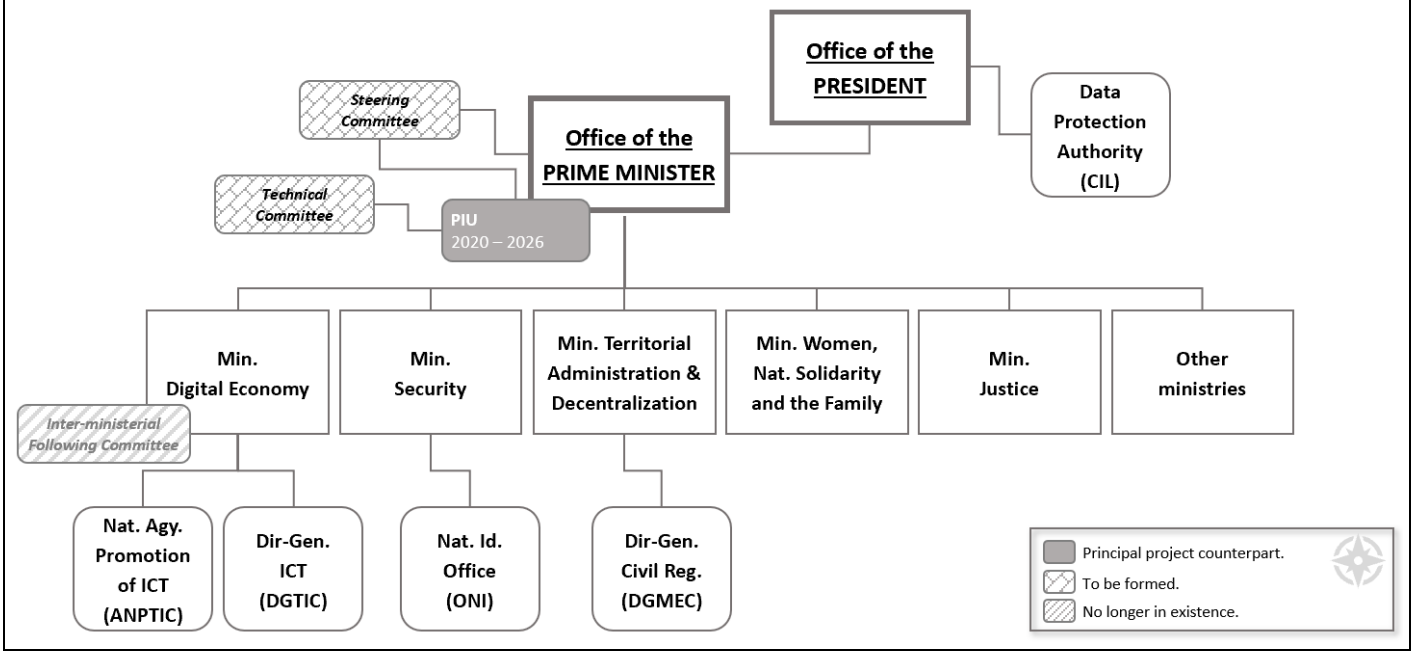
(iii) Burkina Faso

12. **In Burkina Faso, the PMO will have project oversight, with implementation of the project being carried out by a new PIU being created in the PMO.** The Government has elected to anchor the project in the PMO until such time as a more permanent institutional arrangement for overseeing the *f*ID system (*i.e.*, a *f*ID System Authority) can be established. Project implementation will be carried out by a new PIU created under one of the PMO's budget-programs. The budgetary program ("*programme budgétaire*") is led by a program manager ("*responsable du programme budgétaire*"), who will also play the role of focal point for the PMO to the project. The PIU will be led by a Project Coordinator ("*chargé de project*", in the nomenclature of Burkina Faso), and will include a Technical Architect and a Senior Environmental and Social Development Specialist with experience in GRM and consultations, to be in place within one month of project effectiveness; an FM Specialist, a Procurement Specialist, an Accountant, a M&E Specialist and a GRM Assistant, to be in place within three months of project effectiveness; and a Communications Specialist, to be in place within six months of project effectiveness. The project may call upon any other specialist judged necessary for its implementation. The PIU will report to a Steering Committee that makes strategic decisions, then passed down to the PIU to implement. The Project Coordinator is responsible for project operations, results and achievement of dated covenants; will make periodic presentations to the Steering Committee on project operations and progress; recommend strategic issues to the Steering Committee for discussion and decision; validate the project's AWP&B with the Technical Committee and put these forward to the Steering Committee for review and approval. The PIU will work closely with relevant sectorial ministries in order to deliver on Component 3 of the project. The Government will include specific budget allocations for WURI in order to sustain the project. (*See* Figure 5.)

[151] In the instance that a representative of the Presidency chairs the Steering Committee (which would make it analogous to the other countries), then the Presidency would not have the stated final approval.

Figure 5: Institutional Arrangements in Burkina Faso

The Office of the Prime Minister to oversee the Project through a focal point, supported by a PIU in that Office.



13. **Two separate organs will be created: a Steering Committee and a Technical Committee.** Composed of, among others, the heads and directors of the chief stakeholders, or their representatives with decision-making authority, the Steering Committee ("*Comité de revue*", in the nomenclature of Burkina Faso) will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions. The Technical Committee will give inputs to the PIU in order to facilitate its preparation of technical and operational documents. The Steering Committee and the Technical Committee will be established within three months of effectiveness. In preparation for the project, the Government of Burkina Faso has adopted the national roadmap on unique identifiers that its Monitoring Committee ("*Comité de suivi*") developed.

14. **The PMO's involvement is to assure the transversality and to oversee the project.** After review by the focal point within the PMO, the Steering Committee will have: (i) final approval of the project's AWP&B, which are first formed and recommended to the Steering Committee by the PIU; (ii) validation of technical reports on the design of the *f*ID system and on its implementation, as recommended by the PIU on the basis of the Technical Committee's recommendations; and (iii) before submission to the Council of Ministers, review of the *National Strategy on Identification for Service Delivery*, as developed by the PIU on the basis of inputs and recommendations from all stakeholders. The focal point in the PMO will work with the Project Coordinator of the PIU. The focal point will participate in the Steering Committee as a fully participating member, and will be a member of the Technical Committee.

(iv) Niger

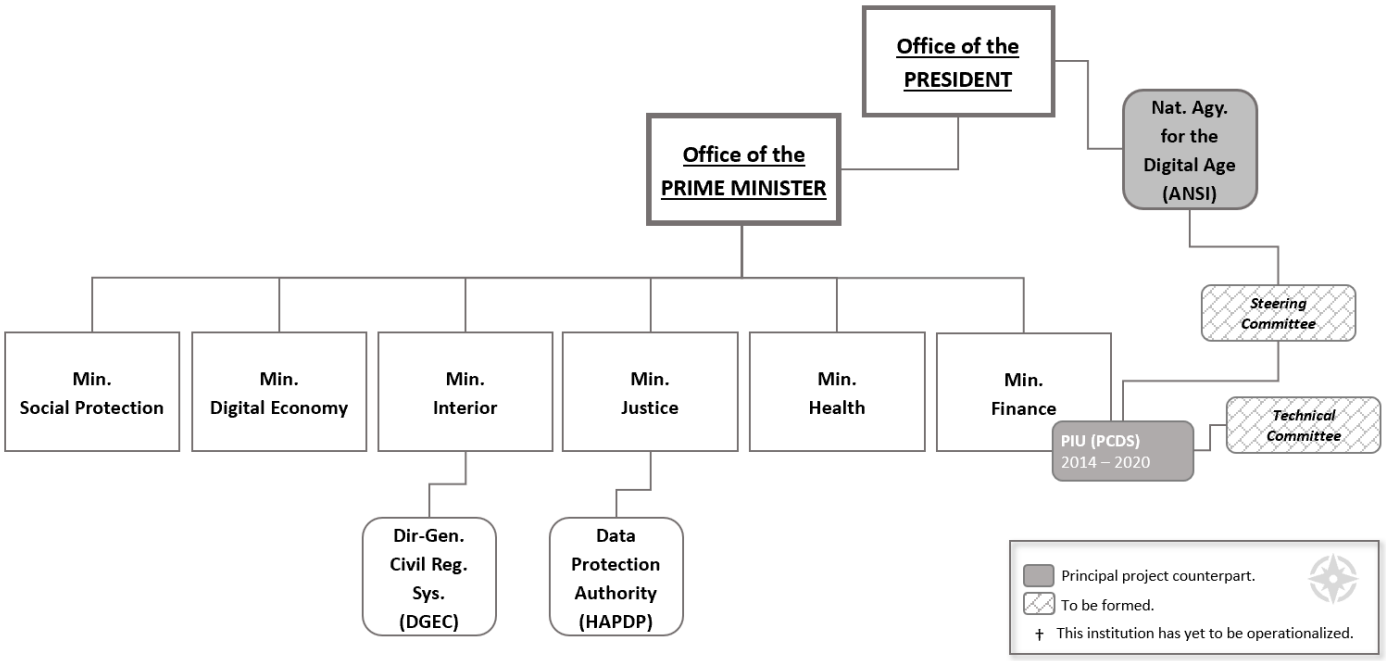
15. **In Niger, the Presidency will have project oversight through a focal point, and a new PIU will be established within its structure.** The Director-General of the ANSI[152] will serve as the focal point for the Presidency. Operational

[152] *Décret n° 2017-759/PRN du 29 juin 2017 portant approbation des statuts de l'Agence Nationale pour la Société de l'Information (ANSI).*

support will be provided by the PIU of an existing World Bank project, the Public Sector Capacity and Performance for Service Delivery Project (PCDS)[153], which is anchored in the Ministry of Finance. Project implementation will be carried out by the PIU, led by a Project Coordinator, and including a Technical Architect and a Senior Environmental and Social Development Specialist with experience in GRM and consultations, to be in place within one month of effectiveness; an FM Specialist, a Procurement Specialist, an Accountant, an M&E Specialist and a GRM Assistant, all to be in place within three months of project effectiveness; and a Communications Specialist, to be in place within six months of effectiveness. The PIU will report to a Steering Committee that makes strategic decisions, then passed down to the PIU to implement. The Project Coordinator is responsible for project operations, results and achievement of dated covenants; will make periodic presentations to the Steering Committee on project operations and progress; recommend strategic issues to the Steering Committee for discussion and decision; validate the project's AWP&B with the Technical Committee and put these forward to the Steering Committee for review and approval. The project will work closely with ANSI, the Ministry of Digital Economy and line ministries in charge of human capital development to provide unique identifiers for the social registry information system, financial inclusion, education, health and to offer support to refugees and host communities, to deliver on Component 3 of the project. The Government will include specific budget allocations for WURI in order to sustain the project. (*See* Figure 6.)

Figure 6: Institutional Arrangements in Niger

The Office of the President to oversee the Project through a focal point in ANSI, supported initially by the PCDS-PIU



16. **The Steering Committee will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions.** Composed of the heads of the principal stakeholders, the Steering Committee will have overall supervising authority and will follow-up and approve technical progress, as well as have financial oversight and make decisions. The PMO will have final approval of the Steering's

[153] NE-Public Sector Capacity and Performance for Service Delivery - P145261.

Committee's review of (i) the project's AWP&B, which are first formed and recommended to the Steering Committee by the PIU; (ii) the *f*ID system design and implementation, as recommended by the PIU on the basis of the Technical Committee's recommendations; and (iii) the elaborated *National Strategy on Identification for Service Delivery*, as developed by the PIU on the basis of inputs and recommendations from all stakeholders.[154] The Technical Committee will give inputs to the PIU in order to facilitate its preparation of technical and operational documents. The Steering Committee and the Technical Committee will be established within three months of effectiveness.

17. **The PMO's involvement is to assure the transversality and to oversee the project.** The PMO will have final approval of the Steering's Committee's review of (i) the project's AWP&B; (ii) the *f*ID system design and implementation; and (iii) the elaborated *National Strategy on Identification for Service Delivery*, as developed by the PIU on the basis of inputs and recommendations from all stakeholders.[155] A focal point in the PMO will work with the Project Coordinator of the PIU. The focal point will participate in the Steering Committee as a fully participating non-voting member, and will be a member of the Technical Committee.

B. Financial Management

18. **As part of project preparation, a FM assessment of the proposed PIUs has been conducted for Togo, Benin, Burkina Faso and Niger.** The objective of the assessment is to determine whether the respective selected projects implementing units have adequate FM arrangements to ensure that: (a) project funds will be used for purposes intended in an efficient and economical way; (b) project financial reports will be prepared in an accurate, reliable and timely manner; (c) the project's assets will be safeguarded, and (d) it is subjected to a satisfactory auditing process[156]. The review of the FM existing systems included budgeting, staffing, financial accounting, financial reporting, funds flow and disbursements, internal and external audit arrangements.

(i) Financial Management and Disbursement

19. The assessment covered the project implementing units: UCP-WARCIP-Togo, the project implementing unit of West Africa Regional Communications Infrastructure Project - APL 2 (P123093) in Togo; ANIP[157] under the supervision of the Presidency in Benin; Burkina PIU, the project implementation unit to set up within the PMO in Burkina Faso (Burkina PIU); and the PIU for the ongoing IDA funded NE-Public Sector Capacity and Performance for Service Delivery Project (P145261)—PCDS-PIU—in Niger.[158] In line with the country regulation of projects and programs, the Government of Burkina Faso will issue, by effectiveness, an order creating the PIU within a budget program of the PMO (Burkina PIU).

(ii) Budgeting Arrangements

20. The UCP-WARCIP-Togo, ANIP PIU, Burkina PIU and PCDS-PIU (and later the new PIU) in Togo, Benin, Burkina Faso and Niger respectively will prepare an annual work plan and budget (AWP&B) based on their own work plans. Implementing entities receiving funds from the above-mentioned project implementing entities will submit their

[154] In the instance that a representative of the PMO chairs the Steering Committee (which would make it analogous to the other countries), then the PMO would not have the stated final approval.
[155] In the instance that a representative of the PMO chairs the Steering Committee (which would make it analogous to the other countries), then the PMO would not have the stated final approval.
[156] The FM assessment was carried out in accordance with the Financial Management Manual for World Bank-Financed Investment Operations effective on the 1st March 2010, and reissued on the 10th of February 2017, and the supporting guidelines
[157] *Décret n° 2018-206 du 06 juin 2018*.
[158] Individual assessments are filed in World Bank's operational systems.

budgets to the respective PIUs for consolidation. The AWP&B will then be approved by respective Steering Committees and submitted to the World Bank before the beginning of the fiscal year.

21. The implementing entities will monitor the project's execution with the projects' accounting software in accordance with the budgeting procedures specified in the FM manual of procedures and report on variances along with the semi-annual IFRs. The budgeting system needs to forecast for each fiscal year the origin and use of funds under the project. Only budgeted expenditures would be committed and incurred to ensure the resources are used within the agreed upon allocations and for the intended purposes. The semi-annual IFRs will be used to monitor the execution of the AWP&B.

(iii) Accounting Arrangements

22. ***Accounting Policies and Procedures, and information system:*** Overall, there are adequate accounting procedures for the selected project implementing entities for the four countries; three entities in Benin, Burkina Faso and Niger will acquire and install accounting software appropriate for the needs of the project based on ToRs to be agreed with the World Bank, while the entity in Togo will utilize a multi-site license of the existing accounting software used for UCP-WARCIP-Togo to reflect the needs of the proposed project. The accounting staff in each project implementing entity will be trained to be conversant with the accounting software.

23. ***Accounting Staff:*** To strengthen the accounting staffing arrangements in the selected project implementing entities for the four countries, a number of actions are recommended. All accounting staff where necessary, will be trained in the World Bank FM and Disbursement procedures as well as in the use of the projects' accounting software.

- ***Togo***: The UCP-WARCIP-Togo needs to maintain the current accounting staff for this project. An adequately qualified and experienced FM staff will be recruited to work exclusively on WURI: comprising of an Accountant within six months of effectiveness.
- ***Benin***: The PIU within ANIP will need to competitively recruit an FM specialist and an Accountant within three months of effectiveness.
- ***Burkina Faso***: The Burkina PIU will recruit on a competitive basis, an FM Specialist and an Accountant with experience and qualifications acceptable to the World Bank and to be dedicated to WURI within three months of effectiveness.
- ***Niger***: The existing FM staff within the PCDS-PIU will handle WURI activities during preparation; within three months of effectiveness, a qualified and experienced FM specialist and an Accountant will be competitively recruited and dedicated to WURI in the new PIU.

24. ***Accounting Standards and basis:*** All fiduciary units in Togo, Benin, Burkina Faso and Niger will use the SYSCOHADA accounting system customized for African Francophone Countries. They will also use the cash basis of accounting.

(iv) Internal Control and Internal Audit Arrangements

25. ***Internal Controls:*** The internal control procedures will be documented in the FM Manuals of procedures for each of the project implementing entities and their PIMs that will take into consideration gaps in their existing FM Manuals/Regulations to ensure project FM arrangements are in line with the Financing Agreement. These will ensure that the project does have an effective internal control system covering the procedures required to support activities under different components, including those that will be carried out with subnational and local actors. A review of the

internal control systems was conducted, and there are no major internal control or accountability issues that were noted.

26. ***Internal Audit:*** it was agreed that each of the project implementing entities will recruit a qualified and experienced internal auditor for Togo within three months of effectiveness, and in Benin, Niger and Burkina Faso and within six months of effectiveness, to ensure that project implementation is going on as planned. Internal auditors in each of the implementing entities should ensure that the project's audit is included in their work plan and the audit conducted using a risk-based approach.

(v) Governance and Anti-Corruption (GAC) Arrangements

27. All of the country implementing entities will follow their institutional rules/regulation/guidelines/policies and procedures. FM arrangements will ensure that there are internal control systems in place and audits conducted to prevent and detect fraud and corruption. Transparency and accountability are highly encouraged by putting the project's budget and audited financial statements on the project implementing entity's websites where applicable. Complaints handling mechanisms should also be set up by the project implementing entities such that beneficiaries who are not receiving services as planned can have a mechanism to raise their complaints such that they are followed up and addressed. This will involve putting in place a system to record all complaints received, direct them to the responsible person to be addressed and record when a response is sent to the complainant. In addition, there are the World Bank Anti-Corruption Guidelines that the project will have to comply with.

(vi) Funds Flow Arrangements

28. ***Designated and Project Accounts*:** ANIP in Benin as well as the PIU in Burkina Faso will have to open Designated Account (DA), denominated in CFAF, at the Central Bank of West African States (Banque Centrale des Etats de l'Afrique de l'Ouest - BCEAO), and a Project Operational Account denominated in local currency. UCP-WARCIP-Togo and PCDS-PIU (and later the new PIU in Niger) will open a DA in a reputable commercial bank acceptable to the World Bank. The signatories to these bank accounts should be in line with the FM Manuals of procedures of the implementing entities. Payments to eligible expenditure can be made from either the DA and project operational account. The signatories to these accounts should be in line with the FM Manuals of the sub-implementing entities and they should be submitted to the main implementing entities in the country.

29. ***Disbursements:*** All the project implementing entities in the four countries will access funding from the World Bank using the disbursement methods as described in the World Bank Disbursement Handbook, (*i.e.*, advance, direct payment, reimbursement, and special commitments). Detailed disbursement procedures will be documented in the FM Manuals of procedures. Upon credit/grant effectiveness, each entity will be required to submit a withdrawal application for an initial deposit to the DA, drawn from the IDA credit/grant, in an amount to be agreed to in the Disbursement and Financial Information Letter (DFIL). Further deposit of funds from IDA to the DA will be made upon evidence of satisfactory utilization of the advance, reflected in Statements of Expenditure (SOEs). Withdrawal applications would be required to be submitted regularly at least once a month.

30. If ineligible expenditures are found to have been made from the Designated and/or Project Accounts, the borrower will be obligated to refund the same. If the DA remains inactive for more than three months, the World Bank may reduce the amount advanced. The World Bank will have the right, as reflected in the terms of the Financing Agreement, to suspend disbursement of the funds if significant conditions, including reporting requirements, are not complied with. Additional details regarding disbursement will be provided in the disbursement letters.

31. ***Financial Reporting Arrangements***. UCP-WARCIP-Togo, ANIP PIU in Benin, Burkina PIU and PCDS-PIU (and later the new PIU) in Niger will prepare semi-annual un-audited IFRs in form and content satisfactory to the World Bank, which will be submitted to the World Bank within 45 days after the end of the semester to which they relate. The formats and contents of the IFR have been agreed between the World Bank and the national implementing entities during negotiations. The contents of the IFR for all implementing entities will include the following information to account for project funds:

- Statement of Sources and Uses of Funds;
- Statement of Uses of Funds by Project Activity/Component;
- Designated Account Activity Statement;
- Bank statements for both the Designated and Project Account and related bank reconciliation statements;
- Summary statement of DA expenditures for contracts subject to prior review; and
- Summary statement of DA expenditures not subject to prior review.

32. UCP-WARCIP-Togo, ANIP in Benin, Burkina PIU and PCDS-PIU in Niger respectively will also prepare the Project's annual financial statements within three months after the end of the accounting year in accordance with International Public Sector Accounting Standards. The audited financial statements will be required to be submitted to the World Bank within six months after the end of the fiscal year.

33. ***External Audit Arrangements:*** Togo, Benin, Burkina Faso and Niger will use private audit firms that are acceptable to the World Bank; the cost of hiring a private audit firm will be met by the project. All audits should be carried out in accordance with International Standards on Auditing. ToRs for each implementing entity will be agreed with the World Bank. The external auditors should be appointed within six months of effectiveness. Audit reports together with management letters should be submitted to the World Bank within six months after the end of the government's fiscal year (December 31st for the four countries). The audit reports will be publicly disclosed by the WBG in accordance with the World Bank's disclosure policy. A review of audit reports of each of the project implementing entities was done and as documented under Internal Controls above, there were no major accountability and internal control issues that need to be addressed. Neither of the two existing PIUs (WARCIP-Togo; PCDS-Niger) have outstanding audit reports.

Table 8: Financial Management Action Plan

Issue/Topic	*Action Recommended*	*Responsible Body/Person*	*Completion Status/Date*
Country Specific Actions			
Togo			
Staffing	Maintain existing FM Specialist	WARCIP-PIU	N/A
	Recruitment and appointment an accountant dedicated to the WURI project	WARCIP-PIU	Within six months of effectiveness
Information system accounting software	Configure WARCIP-TOGO's accounting software parameters to take into consideration the specificity of the new project	WARCIP-PIU	Within three months of effectiveness

Issue/Topic	*Action Recommended*	*Responsible Body/Person*	*Completion Status/Date*
Country Specific Actions			
Administrative Accounting and Financial Manual	Preparation of a PIM	WARCIP-PIU	Within one month of effectiveness
Internal Auditing	Recruitment and appointment of an internal auditor	WARCIP-PIU	Within three months of effectiveness
External Auditing	Recruitment and appointment of an external auditor	WARCIP-PIU	Within six months of effectiveness
Benin			
Staffing	Recruitment and appointment of (i) FM Specialist and (ii) Accountant	Government of Benin	Within three months of effectiveness
Information system accounting software	Acquisition of an accounting software	Government of Benin	Within three months of effectiveness
Administrative Accounting and Financial Manual	Preparation of a PIM	Government of Benin	Within three month of effectiveness
Internal Auditing	Recruitment and appointment of an internal auditor	Government of Benin	Within six months of effectiveness
External Auditing	Recruitment and appointment of an external auditor	Government of Benin	Within six months of effectiveness
Burkina Faso			
Staffing	Recruitment and appointment of (i) FM Specialist and (ii) Accountant	Government of Burkina Faso	Within three months of effectiveness
Information system accounting software	Acquisition of an accounting software	Government of Burkina Faso	Within three months of effectiveness
Administrative Accounting & Financial Manual	Preparation of a PIM	Government of Burkina Faso	Within three month of effectiveness
Internal Auditing	Recruitment and appointment of an internal auditor	Government of Burkina Faso	Within six months of effectiveness
External Auditing	Recruitment and appointment of an external auditor	Government of Burkina Faso	Within six months of effectiveness
Niger			
Staffing	Recruitment and appointment of (i) a FM specialist and (ii) an accountant	Government of Niger	Within three month of effectiveness
Information system accounting software	Acquisition of an accounting software	Government of Niger	Within three months of effectiveness

Issue/Topic	*Action Recommended*	*Responsible Body/Person*	*Completion Status/Date*
Country Specific Actions			
Administrative Accounting & Financial Manual	Preparation of a PIM	Government of Niger	Within three months of effectiveness
Internal Auditing	Recruitment and appointment of an internal auditor	Government of Niger	Within six months of effectiveness
External Auditing	Recruitment and appointment of an external auditor	Government of Niger	Within six months of effectiveness

34. **Implementation Support Plan:** FM implementation support missions will be carried out twice a year for the four countries based on the substantial FM residual risk rating. Implementation Support will also include desk reviews such as the review of the IFRs and audit reports. In-depth reviews and forensic reviews may be done where deemed necessary. The FM implementation support will be an integral part of the project's implementation reviews.

35. ***Conclusion:*** The conclusion of the assessment is that the FM arrangements in place meet the World Bank's (IDA's) meet the World Bank's minimum requirements under World Bank Policy IPF, and therefore are adequate to provide, with reasonable assurance, accurate and timely information on the status of the project required by World Bank (IDA). The overall FM residual risk rating is substantial for the four countries (Togo, Benin, Burkina Faso and Niger).

C. Procurement

36. **Guidelines.** Procurement for goods, works, and non-consulting and consulting services will be carried out in accordance with the procedures specified in the World Bank Procurement Regulations, dated July 2016, revised November 2017 and August 2018 (Procurement Regulations), and provisions stipulated in the Financing Agreement.

37. **Fraud, coercion, and corruption.** The project's procurement activities will be carried out in accordance with the Anticorruption Guidelines (Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants", dated October 15, 2006 and revised in January 2011 and as of July 1, 2016).

38. **Procurement documents.** For international competitive procurement for goods, non-consulting services, and consulting services, the borrower shall use the World Bank's Standard Procurement Documents with minimum changes, acceptable to the World Bank, as necessary to address any project specific conditions.

39. **Procurement information and documentation—filing and database.** Procurement information will be recorded and reported as follows:

(a) Complete procurement documentation for each contract, including bidding documents, advertisements, bids received, bid evaluations, letters of acceptance, contract agreements, securities, and related correspondence will be maintained at the level of respective ministries in an orderly manner, readily available for audit.

(b) Contract award information will be promptly recorded and contract rosters, as agreed, will be maintained.

(c) Comprehensive quarterly reports indicating (i) revised cost estimates, where applicable, for each contract; (ii) status of ongoing procurement, including a comparison of originally planned and actual

dates of the procurement actions, preparation of bidding documents, advertising, bidding, evaluation, contract award, and completion time for each contract; and (iii) updated Procurement Plans, including revised dates, where applicable, for all procurement actions.

40. **General Procurement Notice**, **Specific Procurement Notices, Requests for Expression of Interest, and results of the evaluation and contracts award** should be published in accordance with advertising provisions in the Procurement Regulations.

41. For request for bids and request for proposals that involve international bidders/consultants, the contract awards shall be published in the United Nations Development Business in line with the provisions of the Procurement Regulations.

42. **Training, workshops, study tours and conferences**. The training (including training material and support), workshops, and conferences attendance based on individual needs, as well as group requirements, on-the-job training, will be carried out based on an approved annual training and workshop/conference plan that would identify the general framework of training activities for the year. A detailed plan and terms of reference providing the nature of training/workshop, number of trainees/participants, duration, staff months, timing, and estimated cost will be submitted to IDA for review and approval before initiating the process. The appropriate methods of selection will be derived from the detailed schedule. After the training, each beneficiary will be requested to submit a brief report indicating what skills have been acquired and how these skills will contribute to enhance his/her performance and contribute to the attainment of the PDO. Reports by the trainees, including completion certificate/diploma upon completion of training, shall be provided to the Project Coordinator, will be kept as parts of the records, and will be shared with the World Bank if required.

43. **Procurement Manual**. Procurement arrangements, roles and responsibilities, methods, and requirements for carrying out procurement shall be elaborated in detail in the Procurement Manual, which will be a section of the PIM. The fragility context of countries and the capacity constraints will be considered, and simplified procurement arrangements will be designed accordingly. The PIM shall be prepared by the Recipients and agreed with the World Bank within three months of the effectiveness date in the cases of Benin, Burkina Faso and Niger. Togo will prepare the PIM within one month of effectiveness.

44. **Operating costs**. Operating costs financed by the project are incremental expenses, incurred by the PIUs or its regional representations, based on the AWP&B as approved by the Association, on account of project implementation, management, and M&E, including utilities, office space rental, office supplies, bank charges, vehicles operation, maintenance and insurance, maintenance of equipment and buildings, communication costs, travel and supervision costs (that is, transport, accommodation, and per diem), and salaries of contracted and temporary staff. They will be procured using the procurement procedures specified in the project's manual of administrative, financial, accounting and procurement procedures accepted and approved by the World Bank.

45. The procurement activities for the project will be executed by the respective Project Implementing agencies; Project Implementing Units (PIU) will be set out within these agencies. The PIU will carry out the following activities: (a) managing the overall procurement activities and ensuring compliance with the procurement process described in the relevant manuals; (b) ensuring compliance of bidding documents, draft requests for proposals, evaluation reports, and contracts with World Bank procedures; (c) preparing and updating the Procurement Plan; (d) monitoring the implementation of procurement activities; (e) developing procurement reports; and (f) seeking and obtaining approval of internal designated entities and then of IDA on procurement documents, as required.

46. The PIU will participate in the process of all procurement activities and will notably support the following activities: (a) preparation of ToRs and the bidding documents; (b) preparation of evaluation reports and contracts related with World Bank procedures; and (c) participation in procurement commission activities and all related meetings. Detailed assessments of each implementing agency were carried out to assess each agency's capacities. Table 9 below summarizes actions to be undertaken by each country to strengthen capacity and mitigate any procurement risks.

47. **For all PIUs, procurement under the proposed project will be carried out in accordance with the following World Bank procedures:** (a) the *World Bank Procurement Regulations (PR) for IPF Borrowers*, dated July 2016 and revised in November 2017, and August 2018; (b) "Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants", dated the 15th October 2006 and revised in January 2011 and applicable as of the 1st July 2016; and (c) other provisions stipulated in the Financial Agreements.

48. The overall procurement risks for the Program is considered high considering the lack of experience in World Bank procurement procedures, the size of contracts to be procured and the overall fiduciary risks in the countries concerned. An action plan was agreed upon during the appraisal with the PIUs in Togo, Benin, Burkina and Niger to mitigate the risks identified in the procurement assessment. With the implementation of the proposed mitigation measures of the action plan (*see* Table 9 below) and the support of World Bank team, the overall residual procurement risk is rated moderate.

Table 9: Procurement Action Plan

Issue/Topic	*Milestone*	*Responsible Body/Person*	*Completion Status/Date*
Togo			
Staffing	Maintain existing procurement Specialist	WARCIP-PIU	n/a
Procurement strategy and plan	PPSD	WARCIP-PIU	Completed
	Procurement plan	WARCIP-PIU	Completed
Benin			
Staffing	Recruitment and appointment of one procurement specialist	ANIP	Within three months of effectiveness
Procurement strategy and plan	PPSD	ANIP	Completed
	Procurement plan	ANIP	Completed
Burkina Faso			
Staffing	Recruitment and appointment of one procurement specialist	Government of Burkina Faso	Within three months of effectiveness
Procurement strategy and plan	PPSD	MDENP	Completed
	Procurement plan	MDENP	Completed

Niger			
Staffing	Recruitment and appointment of one procurement specialist	Government of Niger	Within three months of effectiveness
Procurement strategy and plan	PPSD	PCDS-PIU	Completed
	Procurement plan	PCDS-PIU	Completed

49. **Procurement methods.** The Recipients will use the procurement methods and market approach in accordance with the Procurement Regulations.

50. **Procurement Procedures**. When approaching the national market, the country's own procurement procedures may be used with the requirements set forth or referred to in paragraphs 5.3 to 5.6 related to National Procurement Procedures and subject to certain requirements for national open competitive procurement. Other national procurement arrangements (other than national open competitive procurement) that may be applied by the Recipients (such as Limited/Restricted Competitive Bidding, RFQ, Shopping, Local Bidding, and Direct Contracting), shall be consistent with the World Bank's core procurement principles and ensure that the World Bank's Anticorruption Guidelines and Sanctions Framework and contractual remedies set out in its Legal Agreement apply.

51. **Special considerations**. Some countries comprise high zones of fragility and insecurity. Therefore, for them, the project will trigger paragraph 12 of the Policy for IPF in order to apply flexibilities and simplification to facilitate procurement implementation. These procurement arrangements will draw on the World Bank Guidance on Procurement Procedures in Situations of Urgent need of Assistance or Capacity Constraints issued on 1st July 2016. These measures include the use of Borrower's national procurement provided the arrangements are consistent with the World Bank's Core Procurement Principles. The simplified procurement arrangements will be detailed in the procurement section of the PIM. Burkina and Niger will review the possibility of using Hands-on Expanded Implementation Support (HEIS).

52. **Frequency of procurement reviews and implementation support.** The World Bank's prior and post reviews will be carried out based on thresholds indicated in Table 10. IDA will conduct six-monthly implementation support missions and annual post procurement reviews. The standard post procurement reviews by the World Bank staff should cover at least twenty percent of contracts subject to post review. Post reviews consist of reviewing technical, financial, and procurement reports on project procurement actions by the World Bank staff or consultants selected and hired by the World Bank. Project supervision missions shall include a World Bank procurement specialist or a specialized consultant. IDA may also conduct an independent procurement review at any time until two years after the closing date of the project.

53. **Procurement prior review.** The procurement risk is rated High. Table 10 summarizes the procurement prior review High risk. These prior review thresholds can evolve according to the variation of procurement risk during the life of the project.

Table 10: Procurement Prior Review Thresholds (US$, millions) for High Risk

Type of Procurement	*Thresholds*
Works	5.0
Goods, information technology, and non-consulting services	1.5
Consulting firms	0.5
Individual consultants	0.2

54. **Contract management and administration.** For all prior review contracts, contract management plans (in line with the provisions of Regulations Annex XI) will be developed during contracts creation and completed at the time the contracts are signed.

55. **PPSD and Procurement Plan.** (a) The different approaches, the selection methods, the need for pre-qualification, estimated costs, prior review requirements, and time frame are agreed between the recipient and the World Bank in the Procurement Plan. (b) PPSDs and derived Procurement Plans for the first 18 months of program implementation were developed during project preparation. The Procurement Plans were finalized and approved during the negotiations. During implementation, the Procurement Plans will be updated as required—at least annually—to reflect the actual program implementation needs and improvements in institutional capacity. Given the complex technology procurements anticipated in the context of this project, during implementation, the project will facilitate the development of a regional procurement strategy and approach.

D. Environmental and Social (Including Safeguards)

56. ***f*ID systems are expected to have substantial socio-economic benefits as they facilitate universal access to public and private services**. In addition, *f*ID credentials that are mutually recognizable across ECOWAS Member States will expedite travel, limit costs (to both the state and the individual), cut down on corruption and harassment and help combat human trafficking. *f*ID credentials will eventually facilitate service access and delivery across the ECOWAS region. In this regard, the benefits will be particularly evident for frequent travelers, such as cross-border traders and those residing in border regions.

57. **By promoting universal coverage, the *f*ID system will help to break patterns of exclusion and discrimination, especially for the historically marginalized**. Due attention will be given throughout the identification life cycle (*see* Annex 2) to ensuring that vulnerable groups are included, and that discrimination is actively combated. Vulnerable groups in each country are being identified through stakeholder consultations and targeted outreach activities. These will incorporate tailored measures to remove obstacles—logistical, cost (including indirect fees), distance—to assure universality. Approaches such as home-based registration and mobile registration units can help reach the elderly, women, persons with disabilities and the illiterate, as well as those living in remote and isolated communities. Special attention will be given to ensuring accessible, culturally-sensitive implementation, with efforts supported through strong collaboration with national human right bodies, local civil society organizations and international non-governmental organizations and agencies (IOM, UNICEF, UNHCR). Further, risks of exclusion will be managed through (i) training registration teams, at all levels, in non-discrimination and cultural awareness and sensitivity; (ii) public information and awareness campaigns to inform users of their rights; (iii) development of a non-discrimination policy by the relevant national identification agency; and (iv) development of strong GRMs. These measures will be monitored through a set of stakeholder engagement indicators as part of the results framework and M&E system.

58. **Understanding barriers at the individual and community level is paramount to guaranteeing universal inclusion.** Qualitative research in Phase 1 and the ongoing social assessments for Cote d'Ivoire and Guinea have already provided some important insights into motivations and disincentives for registration. These will inform the national-level ESAMPs that will be prepared to inform the design of the *f*ID systems under Component 2 and will provide a roadmap for the overall implementation of the project.

59. **Stakeholder engagement, awareness campaigns and social accountability measures are integral to the Project's success.** In each country, the PIU will be responsible for developing national, project-specific, SEPs, drafts of which were prepared during appraisal. To coordinate and implement the social risk management activities and instruments, the PIUs will each recruit one full-time, senior social development specialist and one support staff. Additionally, each PIU will ensure that the views of direct project beneficiaries have been accounted for in project M&E and that an independent third party is retained to oversee implementation, as well as usage of the *f*ID system, taking into account its organizational and institutional aspects. (Table 11, below, summarizes activities to be undertaken by the borrower with regards to environmental and social safeguards.)

60. **The Project will develop GRMs to respond to queries or clarifications, resolve problems with implementation and efficiently and effectively address complaints.** The GRMs will (i) be responsive to the needs of beneficiaries; (ii) serve as a channel for soliciting enquiries, inviting suggestions and increasing participation; (iii) collect information to improve operational performance; (iv) enhance project legitimacy among stakeholders; (v) promote transparency and accountability; (vi) deter fraud and corruption; and (vi) mitigate project risks. Where possible, GRMs will be technology-enhanced using hotlines, mobile apps, text messaging and social media channels.

61. **Regarding data protection and privacy, the Program structurally limits concerns about the improper use, or sharing of, data leading to discrimination or persecution**. *f*ID systems will only collect and manage a very limited data set. Data collected for the *f*ID system will be extremely limited and will not include any socio-economic or demographic data. Furthermore, the assigned UNI will be unique, random and unintelligible. These systems will also be accompanied by strong legal and institutional controls. Further, WURI will support capacity-building activities for data protection authorities.

62. **No civil works will be financed, and no land acquisition is expected**. Therefore, the Environmental and Social Standard on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5) does not apply. There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities as per the definition of ESS7 in the Program areas of the Phase 2 countries and thus this Standard is also not relevant. Nonetheless, the multilingual and multicultural richness of the countries, including the presence of pastoralists, require close collaboration with local and traditional authorities as well as consideration of certain ethnic and cultural groups that might be historically marginalized and thus less likely to participate in the Project without culturally appropriate outreach and consultation efforts.

63. **The four countries have prepared and disclosed ESCPs, SEPs and LMPs.** The projects have also prepared ToRs for ESAMPs which have been disclosed. The social assessments will be prepared, consulted upon, cleared by the World Bank and disclosed in-country and at the World Bank's website. They will be used to inform the project about social risks and, as and when necessary, the project will include measures to address these risks.

64. **The Program is expected to have minimal to no adverse environmental impacts as no civil works are financed.** Limited physical investments will be made to set up data centers and *f*ID system infrastructure at national levels including servers, computers and tablets among others. Therefore, energy efficiency, e-waste handling and disposal

might be relevant and will be assessed and managed according to requirements of ESS1 and ESS3 of the ESF and WBG General EHS Guidelines. The project is not significant user of water or other raw materials. The project is not significant GHG emitter and therefore no GHG emission estimation is required. Phase 1 was rated as Safeguards Category B, consistent with the provision of OP/BP 4.01 Environmental Assessment.

Table 11: Environment and Social Action Plan

Issue/Topic	*Milestone*	*Responsible Body/Person*	*Completion Status/Date*
Staffing	Recruitment and appointment of senior environmental and social development specialist with experience in GRM and consultations	PIUs	Within one month of effectiveness
	Recruitment and appointment of one assistant familiar with GRM procedures	PIUs	Within three months of effectiveness
Environmental and Social Assessment and Management Plan (ESAMP)	ToR for ESAMP disclosed on World Bank's external website and Borrower's website	PIUs and World Bank	Completed
	Draft ESAMP	PIUs	Within five months of effectiveness
	Final ESAMP disclosed on World Bank's and Borrower's websites	PIUs and World Bank	Within 6 months of effectiveness
Environmental and Social Commitment Plan (ESCP)	Draft ESCP	Borrower	Completed
	Final ESCP disclosed on World Bank's external website and Borrower's website	Borrower and World Bank	Completed
Stakeholder Engagement Plan (SEP)	Draft SEP	Borrower	Completed
	Final SEP disclosed on World Bank's external website and Borrower's website	Borrowers and World Bank	Completed
Labor Management Plan (LMP)	Draft LMP	Borrower	Completed
	Final LMP disclosed on World Bank's external website and Borrower's website	Borrower and World Bank	Completed
Capacity Building	Capacity building on social risk management including grievance redress, non-discrimination in the provision of services, etc.	PIUs	Within three months of effectiveness
Grievance Redress Mechanism (GRM)	Grievance redress system operational	PIUs	Within six months of effectiveness
External Monitoring	Appointment of independent third party (for oversight of the use of identification systems) completed and contract signed	PIUs	Within six months of effectiveness

E. Monitoring and Evaluation

65. **Results indicators.** Progress toward the achievement of the PDO will be measured based on the PDO-level and intermediate results indicators as part of the Project's Results Framework. Project management information systems

and M&E systems of participating countries will be used to collect relevant data and information pertaining to measuring results, including project outcomes and quality of project execution. The country PIUs will be responsible for carrying out the main M&E functions, with the exception of the first PDO indicator on the legal and technical robustness of the *f*ID system, which will be calculated based on an evaluation performed by the World Bank team based on data supplied by the PIUs. Country PIUs will be responsible for developing a detailed M&E plan, specifying standard protocols and guidelines for data collection and use for the duration of the Project, and will organize trainings for relevant stakeholders in the M&E plan. Progress reports will be closely reviewed by the multi-sectoral Steering Committees set up in each country as well as by a regional working group created to supervise the Program on the regional level. The country PIUs will provide quarterly monitoring tables and progress reports on all PDO- and intermediate-level results indicators as well as any additional country-level indicators specified in the country projects' respective M&E plans to the World Bank during routing implementation-support missions.

66. **The Project includes five indicators to measure the success or failure of the operation.** The first five are PDO-level indicators, measuring the progress toward PDO achievement. Each of these indicators assesses a particular aspect of the PDO: robustness and inclusivity of the country *f*ID system, mutual recognition within ECOWAS, and the population's ability to use the *f*ID system to access services. At the end of the Project, the success of this operation will be measured against the target values of the PDO indicators. During implementation, the PIUs will be able to measure whether implementation is on track or not by benchmarking against the yearly targets listed in the Results Framework. If project execution underperforms against these yearly indicators, the PIU(s) of the country or countries responsible for the underperformance must propose a list of corrective actions.

67. **The views of direct beneficiaries will be brought into the M&E process.** Annually, each PIU will ensure that the views of direct project beneficiaries, including institutions (functional users) and individuals (those eligible to receive a UNI), have been accounted for in project M&E. The M&E plan should detail how and at what intervals the views of both groups will be assessed. Data sources may include consultations conducted as part of project stakeholder engagement, data from the GRM, as well as separate data-collection efforts as necessary.

68. **Existing M&E arrangements of the country PIUs will be evaluated and capacity gaps addressed.** It is expected that each country PIU will likely need to reinforce its M&E capacity, for example by recruiting or training technical personnel or making improvements to their respective project management information systems in order to better manage project data. The M&E evaluation conducted in each country will identify all such capacity gaps and propose a costed plan for addressing them, including a detailed timeline. The M&E evaluation should be available prior to credit effectiveness in order to allow sufficient time to address the identified capacity gaps through project investments before the main project activities begin.

69. **In each country, the PIU will be responsible for developing a detailed M&E plan.** This M&E plan will include all project indicators, including all indicators listed herein, as well as any additional indicators deemed necessary to effectively monitor implementation; to identify data sources and data collection protocols for all indicators; to detail logistical arrangements for data collection; and to explain communication needs related to M&E, especially to stakeholders. For each phase of the Program, the M&E plan should be available prior to credit effectiveness in the respective country in order to allow effective monitoring of Year 1 of each MPA phase.

70. **The country PIUs will be primarily responsible for collecting the data needed to measure implementation progress, as specified in the Project's Results Framework.** The PIU will obtain all of the relevant data needed from the data sources identified in the M&E plan to calculate the different required indicators from relevant project

stakeholders as necessary. For any data sources that are not under the PIUs' purview, the relevant PIU will be responsible for identifying a focal point and to detail a data-sharing plan between institutions in compliance with international good practice on data privacy as well as any applicable local laws. These inter-institutional arrangements should be detailed in the M&E plan.

71. **Each country PIU will be responsible for data collection, consolidation, analysis and evaluation.** The PIU will submit an M&E quarterly report to both the World Bank and to the Steering Committee. Each report will include an updated country-level Results Framework and corresponding Action Table listing corrective actions to be implemented with deadlines and persons responsible clearly identified.

F. Role of Partners

72. **The World Bank is collaborating with various development partners to ensure the rollout of mutually recognizable *f*ID systems across ECOWAS.** In the region, there are a variety of donors with a longstanding interest in identification and civil registration reform and modernization, including the EU, the AFD, BTC and the AfDB. The World Bank is also coordinating with UNHCR and IOM on refugee issues in the region, in particular on how to best ensure that each World Bank-financed *f*ID system remains accessible to such vulnerable populations. UNICEF and the Global Financing Facility (GFF) are being consulted on the issue of birth and death registration in the region. The Gates Foundation is also providing support for the design and evaluation of the *f*ID systems, which will have broader lessons and implications for the regional Program.

G. Implementation Support Plan and Resource Requirements

73. **The strategy for supporting project implementation will focus on successfully mitigating the risks identified at various levels and supporting the risk management proposed above in the Key Risks section**. It will consist of (i) implementation support missions and (ii) technical assistance.

74. **Implementation support missions.** The supervision strategy will use a number of instruments to review progress and respond to implementation issues, including:

- **Implementation support missions will be conducted at least twice per year.** Missions will be based on the latest quarterly implementation and financial monitoring reports prepared and submitted by the PIU. Missions will allow the World Bank team to perform evaluations of implementation progress and provide technical support to each PIU and to any other implementing institutions. Additional implementation support will be provided by field-based World Bank staff. There will be one mission per country as well as one regional mission each year. Support from technical partners will be sought when needed, including from the ID4D Initiative.

- **Mid-Term Review (MTR):** A mid-term review will be conducted within thirty months of credit effectiveness. The purpose of this review will be to assess progress and make recommendations, if necessary, for any changes in the PDO, the content of the components, resource allocation, and performance indicators. The MTR will also serve as a mechanism for revisiting design issues that may require adjustments to ensure satisfactory achievement of the PDO.

- **Implementation completion:** At the close of the Program, each Government, the ECOWAS Commission and the World Bank will carry out separate implementation completion reviews to assess the success of each

project and draw lessons from its implementation. Each country PIU will prepare a completion report documenting the project's achievements and results, and drawing lessons for future interventions. The completion report will be based in part on the project's technical, economic, social and environmental impact survey studies, as well as an assessment of beneficiaries' (both functional users and individuals) satisfaction. An Implementation Completion and Results (ICR) Report will be prepared for the Program at closing.

75. **There will be a regional task team leader (TTL) and country-specific TTLs.** This arrangement will enhance interaction with countries and improve monitoring of progress. The World Bank is seeking possible trust funds to strengthen additional capacity for project supervision and to support learning.

76. **Objective of implementation support missions.** The implementation support missions will have the combined aim of reviewing the quality of implementation, providing solutions to implementation problems and assessing the likelihood of achieving the PDO. More specifically, they will (i) review implementation progress by component, including institutional development aspects; (ii) provide solutions to implementation problems as they arise; (iii) review each country's action plan and disbursement programs for the next six months; (iv) review the project's fiduciary aspects, including disbursement and procurement; (v) verify compliance of project activities with the World Bank's environmental and social safeguard policies; and (vi) review the quality of capacity-building activities, which are crucial for an effective implementation of the Program. The missions will combine field visits, when feasible; field-based focus group discussions and interactive workshops with stakeholders for feedback; and regional workshops, as well as workshops with participating countries to highlight implementation issues, pick-up emerging implementation lessons and share mission recommendations, including agreements on actions moving forward. It will also include reviews of semestrial/annual reports and various studies.

77. **Technical support:** Some of the activities contemplated under the project are technically complex. In addition to the World Bank's core supervision team, additional expertise may be periodically needed to provide (i) expert advice on key technology and infrastructure options (*e.g.*, panel of experts) and (ii) technical assistance to PIUs, *f*ID System Authorities or other authorities in the form of hands-on training and mentoring.

78. **Focus of support:** The first two years of implementation will require technical support, with focus subsequently moving to more routine monitoring, troubleshooting and assessments based on the Results Framework. The implementation support missions to participating countries will be on a semiannual basis, followed by regional workshops to discuss views on progress and challenges. The support missions may be complemented by short visits by technical specialists to follow up on specific thematic issues as needed.

79. **Fiduciary support:** Fiduciary teams based in World Bank country offices (FM and procurement specialists) will closely supervise the project's fiduciary management. They will participate in the twice-yearly implementation support missions and facilitate capacity building for the project's fiduciary needs, and, at least annually, procurement staff will organize a post-review of procurement activities.

80. **Support missions:** The FM implementation support plan will consist of desk reviews, on-site visits and capacity building. During implementation support missions, the project FM specialist based in the country office will review the FM systems to ensure the continued adequacy of FM arrangements and will follow up on the implementation of the risk mitigation measures agreed during preparation and set out in the FM action plan. The FM specialist will review the overall operation of the FM system; monitor actions taken on issues highlighted in audit reports, auditor's management letters, internal audits and other reports, and conduct transaction reviews. Desk reviews will include

reviews of IFRs and/or annual audited Financial Statements; and periodically assess project compliance with the FM Manual, as well as the Financing Agreement. The FM specialist will conduct training on World Bank procedures.

81. **Procurement.** On the procurement front, the World Bank will provide implementation support to the client through a combination of prior and post reviews, procurement training to project staff and relevant PIUs, and periodic assessment of project compliance with the procurement manual. Implementation support missions will be geared toward (i) reviewing procurement documents, (ii) providing detailed guidance on World Bank Procurement Guidelines and (iii) monitoring procurement progress against the detailed Procurement Plan. Following the recommendations of the fiduciary assessments of the PIUs, and in addition to the prior review supervision to be carried out from World Bank offices, the semiannual supervision missions will include field visits, of which at least one mission will involve post review of procurement actions.

82. **Safeguards:** World Bank specialists in social and environmental safeguards based in Washington or country offices will provide support to participating countries to ensure proper implementation of the safeguards instruments. Each year, they will conduct implementation support missions to (i) review safeguards reports on project progress, (ii) ensure that procurement arrangements are consistent with the safeguards requirements set out in the project legal agreements and (iii) assess compliance with agreed upon social actions (*e.g.*, mitigation, monitoring, management measures). They will also participate in regional meetings to discuss findings, share lessons learned and propose good practices to help improve safeguards compliance as well as sustainability.

83. **Main focus of implementation:** Table 12 summarizes the main focus of implementation support during the life of the Program.

Table 12: Implementation Support Plan

Time	*Focus*	*Skills Needed*
First Twelve Months	• Project start-up; • Support to preparatory activities (sensitization, community consultations and planning, institution building, strengthening implementation capacity including M&E); • Support to finalization of manuals; • Guidance on applying safeguard instruments; • Development of impact evaluation methodology and oversight of baseline survey; • Establishing coordination mechanisms with complementary projects.	• Regional TTL + Country TTLs • ID Technical Specialist • ID Legal Specialist • FM • Procurement • Social safeguards • Communications • M&E • Leadership development
12–48 Months	• Monitoring implementation performance including progress; • Review technical designs and architecture, legal and institutional design; • Review of annual work plans and disbursement schedule; • Review quality of semestrial/annual reports, data, and various produced studies; • Assess quality of implementation process and data collected • Review of audit reports and IFRs; • Review adequacy of the FM system and compliance with FM covenants; • Assess quality of safeguards instruments as they are applied.	• Regional TTL + Country TTLs • ID Technical Specialist • ID Legal Specialist • FM • Procurement • Social safeguards • Communications • M&E • Leadership development

84. **Skills mix required**: Table 13 summarizes the skills mix required for project implementation.

Table 13: Skills Mix Required

Skills Needed	*Number of Staff Weeks*	*Number of Trips*	*Location*
Regional TTLs	20	4	HQ- based
Operations Officer	10	2	HQ- based
Country TTLs	10	2 for each	HQ/CO- based
ID Technical Specialist	20	2	HQ- based
ID Legal Specialist	20	2	HQ- based
FM	6	1	CO- based
Procurement	6	1	CO- based
Social Development	6	2	CO- based
Communications	2	1	HQ- based
M&E	2	1	HQ- based
Leadership Development	2	1	HQ- based

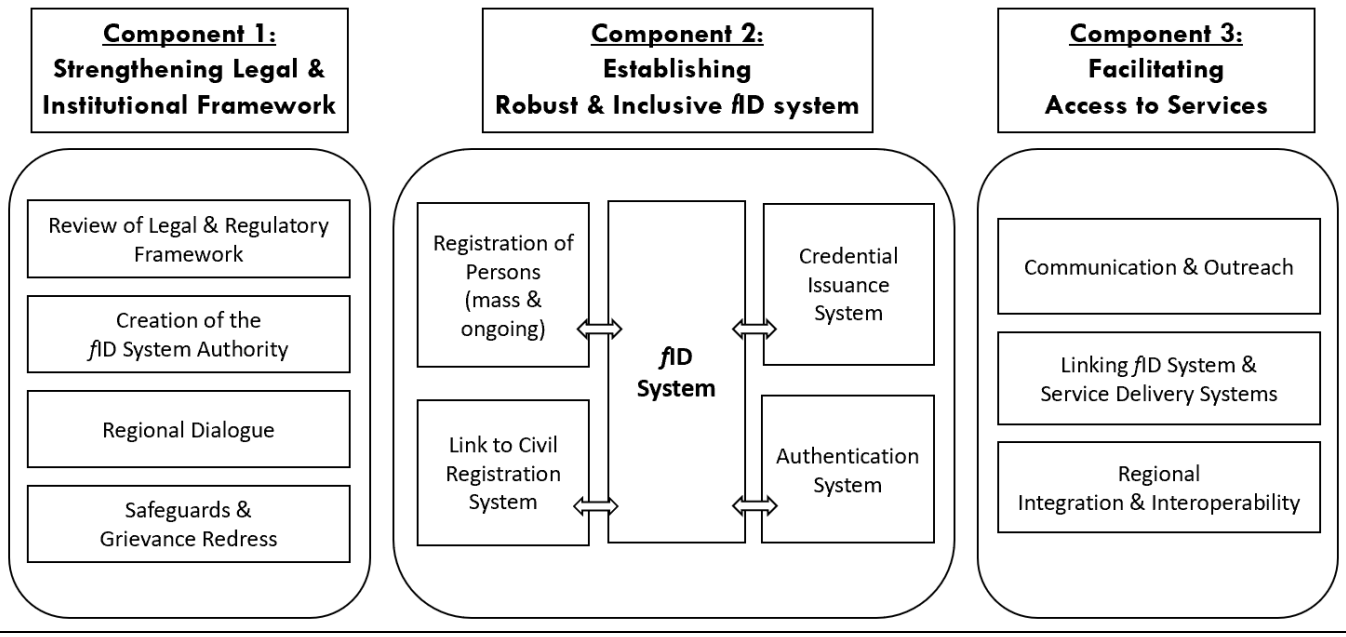
ANNEX 2: DETAILED PROJECT DESCRIPTION

COUNTRY: Western Africa

West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program - Phase 2

85. **The following sections outline the broad scope of each Component as a generic framework to be applied and adjusted to the country-specific context.** It describes how they apply to Phase 2 of the Program in Togo, Benin, Burkina Faso and Niger. The Program structures each country-level operation, or project, around three main Components: (i) strengthening the legal and institutional framework; (ii) establishing robust and inclusive *f*ID systems; and (iii) facilitating access to services through *f*ID credentials. This section outlines the broad scope of each Component.[159]

Figure 7: WURI Program Components



PROJECT COMPONENT 1: STRENGTHENING THE LEGAL AND INSTITUTIONAL FRAMEWORK (TG US$14.3 million; BJ US$6 million; BFUS$11.7 million; NE US$10.5 million)

86. The objective of this Component is to strengthen the legal and institutional framework for the *f*ID system, including providing authentication processes that would allow for mutual recognition across participating ECOWAS Member States, thereby facilitating access to services at both regional and country levels. In order to achieve this objective, this Component will generally finance activities to do the following:

(i) Identify and address gaps in the existing legal and regulatory framework;

(ii) Support the creation of an independent *f*ID System Authority;

[159] World Bank. 2019. *ID4D Practitioners Guide*. Identification for Development. Washington, DC: World Bank Group. *https://id4d.worldbank.org/guide*.

(iii) Conduct regional dialogue on interoperability of *f*ID systems and mutual recognition of *f*ID credentials;

(iv) Institutionalize safeguards, including GRMs; and

(v) Support the PIU.

Sub-component 1.1: Identify and address gaps in existing legal and regulatory frameworks for the *f*ID system

1.1.1 Review of legal and regulatory frameworks on data protection and privacy, data sharing, identification and authentication

87. This sub-component will finance technical assistance to identify and remediate gaps in the existing legal, regulatory and institutional framework. The gap-filling exercise will ensure that the existing legal and policy guarantees—notably those of non-discrimination, privacy, data protection and network security—apply to the *f*ID system; if such is not the case, the appropriate revisions will be undertaken. Particular attention will be paid to assuring mutual recognition of *f*ID systems at the regional level.

88. This sub-component will also support the elaboration, adoption and implementation of a law creating the *f*ID system. This sub-component will oversee the definition and publication of policies and protocols for the usage of the *f*ID system, including standards on access, authentication, data sharing and mutual recognition, in accordance with international good practices, and provide for a process of usage and authentication by both the public and private sectors. The new *f*ID system law will reaffirm such guarantees and create a system for including and registering all persons in the territory of the country, including refugees, stateless persons and other vulnerable groups. That law will, among other things, strictly delimit what data is collected. It will also provide for sanctions for abuse of the system, including denial of services: registration will be freely open to all persons, and denial of service for lack registration in the *f*ID system will be disallowed. Other instruments necessary for the full usage and functioning of the *f*ID system will also be developed. Throughout, a strong emphasis will be on adherence to the *ID4D Principles*. Further, the *f*ID system law will also establish that the *f*ID system can be used and relied upon by separate, functional identification systems, both public and private, to ensure their own regulatory frameworks in order to allow users to employ the authentication potential of the *f*ID system. Individuals will be uniquely identified through a process of de-duplication (based on their biometrics) and assigned a ***unique***, ***random*** and ***unintelligible*** identification number (*i.e.*, the UNI), assigned for life.

89. Legal policies and protocols will be elaborated to allow integration and interoperability between *f*ID and CR systems, as well as other relevant registries and databases. These policies and protocols will implement the legal framework for data exchange between *f*ID and CR systems, and will detail the type of access, the various sanctioned use cases, technical protocols for data transfer and appropriate data privacy safeguards, among other things. These policies and protocols will extend to cover how other registries and databases—both public and private—might rely and access the *f*ID system. Interoperability between *f*ID and CR systems will ensure that, going forward, the UNI can be assigned at the time of birth and deactivated at death, with similar, parallel procedures in place for those unregistering from the *f*ID system. In the case of deactivation of a UNI, the biometrics of the person will be retained but archived in order to assure that there are not abuses, or that a person whose UNI has been deactivated is not assigned a second UNI.

1.1.2 Reinforcement of the data protection and privacy regime

90. Given the sensitivity of identification matters and the need to protect related data, each participating country was required, as a pre-requirement to joining the Program, to have in place certain, essential elements to its data protection and privacy regime. Part of that regime was the creation of a data protection authority. While all participating countries have such an authority, those authorities are at varying degrees of maturity and capacity.[160] Further, it is not necessarily the case that the elements of the data protection law, to which *f*ID system will be subjected to as part of the project, are integrated across other institutional actors that might be impacted by the project. Under this sub-component, the project will support the reinforcement and capacity-building of the data protection authority, as well as the granularization and integration of the data protection and privacy regime with relevant executive instruments. Such activities will be accomplished through necessary studies, training, workshops and study tours. This sub-component will assure that data privacy rights are enshrined in the law and are applicable both to the *f*ID system and to those relying, using or managing it, through granular and easily comprehensible texts. The aim will be assuring the existence of a whole-of-government approach, understood—by government actors, by private sector operators and by individuals—to extend and to apply to all actors (*e.g.*, agents at delivery points, systems' operators).

Sub-component 1.2: Creation of the *f*ID System Authority

1.2.1 Implementation of the institutional framework for the fID system

91. As indicated in Annex 1, the institutional frameworks will differ in each country.

1.2.2 Capacity building for the fID System Authority (including their training of service delivery agencies)

92. Just as a law alone is not sufficient to establish and ensure the necessary data protection and privacy regime so, too, will the institutional framework for the *f*ID system need to be created. To that end, beyond helping each country develop a law on the *f*ID system (*see* Sub-component 1.1), this sub-component of the Program will support the creation of an independent Authority dedicated to maintaining the *f*ID system ("*f*ID System Authority"). Further, it will support the preparation of whatever executive instruments are needed to assure that the *f*ID System Authority develops data sharing agreements, subjected to the data protection and privacy regime, with other institutional actors that might have cause to rely upon the *f*ID system for authentication services. As with the reinforcement of the data protection and privacy regime (*see* Sub-component 1.1), the aim is to ensure a culture of trust between the State and individuals by creating a whole-of-government approach and to developing reliable institution.

93. Reinforcement of the capacity of *f*ID System Authority to carry out the Project through study tours, workshops and training to learn from the other countries and experts on the approach, models, best practices, challenges in implementing the identification projects. This will include study of the change management practices including communication and trainings for successful registration of the people and adoption of *f*ID credential for service delivery to enable the *f*ID System Authority to effectively design and implement the project in their country context.

94. To ensure the sustainability of the new systems, this sub-component will provide ongoing training for new and existing users and administrators, including at decentralized levels. Existing civil servants who will use any of the systems will be targeted for additional and ongoing training, and the curricula used to train new civil servants (*e.g.*, registrars, police) will be revised. Other personnel involved in the *f*ID system's use will also need training, including

[160] For instance, while Togo's data protection law, which created its data protection authority, was adopted on the 29th October 2019, the authority has yet to be operationalized; similarly, although Niger has a data protection law since 2017, its first members only took up work on the 27th November 2019.

database administrators, card-production operators, programmers and various government officials. The training will include topics such as usage of the new digital systems; identification and resolution of common problems; roles and responsibilities; legal, security and privacy issues; and sensitization training on non-discrimination.

Sub-component 1.3: Conduct regional dialogue on interoperability of *f*ID systems

95. This sub-component will foster inter-agency collaboration and strengthen regional engagement on the basis of the *f*ID systems and particularly among the *f*ID System Authorities of participating countries.

1.3.1 Thematic workshops

1.3.2 Collaboration on the regional mutual recognition framework

96. This activity will promote regional engagement, as well as mutual understanding and cooperation among ECOWAS Member States, with the aim of creating regional interoperability of *f*ID systems and mutual recognition to *f*ID credentials by means of common standards, change-management techniques, advocacy and sensitization.

Sub-component 1.4: Institutionalization of safeguards

1.4.1 Review of institutional redress mechanisms (e.g., internal, data protection authority, courts)

1.4.2 Establishment GRMs and policies

97. This activity will include technical assistance to enhance the Government's capacity to address beneficiaries' complaints.

Sub-component 1.5: Project management, GRM and stakeholder engagement

1.5.1 Support for PIU

98. This sub-component will finance activities related to project management. This will include the operational costs of the PIUs, the recruitment of a dedicated project-management resource to coordinate implementation activities between different implementing ministries and the development of a project implementation plan.

1.5.2 Project monitoring and evaluation

99. This sub-component will finance the development and implementation of a M&E system, as well as ongoing M&E activities.

1.5.3 Monitoring of GRM

100. Regular monitoring of GRM indicators will inform the implementation of the *f*ID system.

PROJECT COMPONENT 2: ESTABLISHING ROBUST AND INCLUSIVE *f*ID SYSTEM (TG US$40.2 million; BJ US$22.5 million; BF US$52.3 million; NE US$59.5 million)

101. To ensure the development of a robust and inclusive *f*ID system, Component 2 will finance the design, development and implementation of the following sub-components:

(i) Elaboration of a *National strategy of fID credentials for service delivery*;

(ii) Development of a financial model to ensure sustainability;

(iii) Creation of a *f*ID system, including supporting infrastructure and information systems (*see* Figure 8);

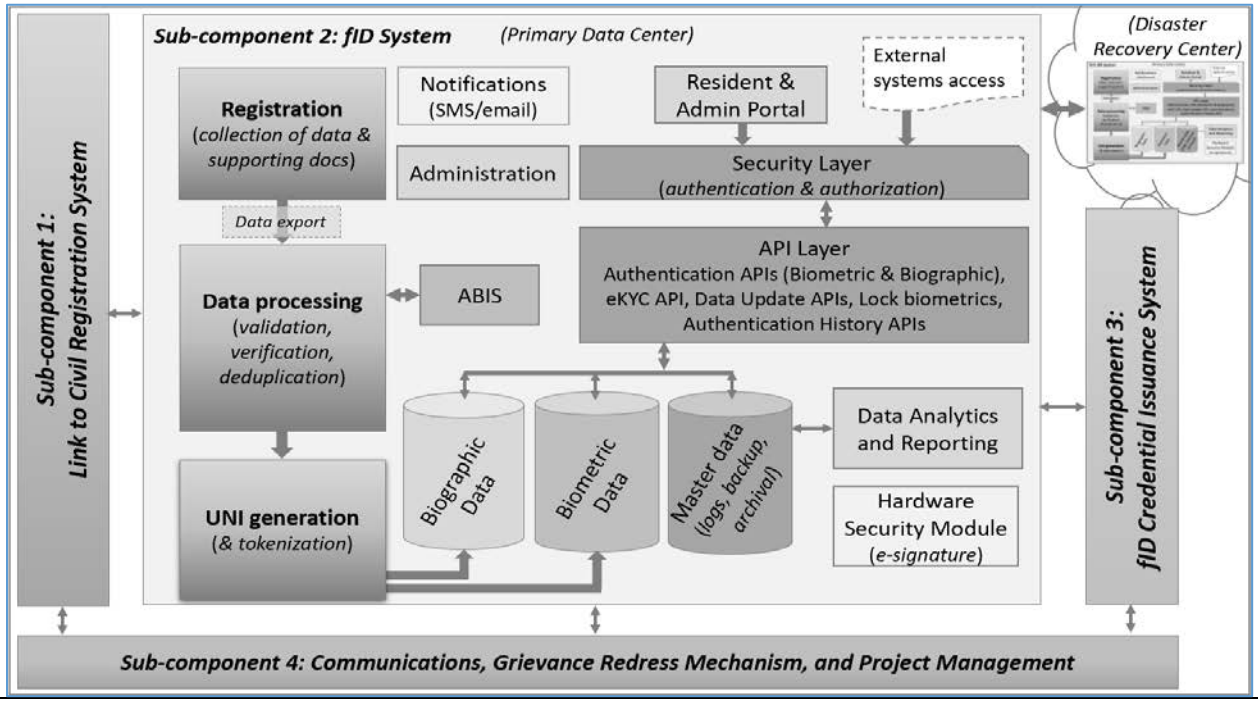
(iv) Development of an authentication system;

(v) Registration, including registration *en masse* of Persons and facilitating ongoing registration and data updates;

(vi) Issuance of *f*ID credentials, including systems for production of *f*ID credentials and distribution of *f*ID credentials to all persons registered in the *f*ID system;

(vii) Links to CR systems for sustainability, including provision of UNIs to newborns and individuals newly registered in the CR system, elaboration of technical protocols and policies; and assessment of existing civil registration.

Figure 8: Solution Architecture of *f*ID Systems by Sub-components[161]



Sub-component 2.1: *f*ID system

102. **This sub-component will finance the establishment of the *f*ID system.** As a foundational identification platform, the *f*ID system is designed with an overarching goal of providing multipurpose proof of unique identity and supporting multiple government and non-government functions or services, with the particular aim of facilitating access to services. The *f*ID credential-linked number (*i.e.*, UNI) is linked to biometric and biographic data of an individual to ensure uniqueness and does not, on its own, entitle its holder to any rights or benefits. The rights or benefits are attached only through the potential used of the *f*ID systems for identity verification and authentication by different service providers. Unlike NID systems, which seek to establish and confer recognition of legal status, the *f*ID system is

[161] The schematic is indicative only, and used for illustrative purposes.

de-linked from nationality, universally accessible, and enables registration of all people in the country without any restrictions/eligibility criteria for registration (*e.g.*, citizenship, age restriction, driving test for driving license). Through the *f*ID system, every person would be uniquely identified and assigned a UNI in the *f*ID system, which can be used for authentication/identity verification. This UNI can be relied on by *any* system for identification and used by *all* people to establish their identity for access to services within the country and in the region.

103. **The *f*ID system will be built for the core function of providing basic government-recognized identity credentials (*i.e.*, *f*ID credentials).** It will comprise a database initially to be populated by a registration sweep: all persons in the territory of the country will be eligible for registration, irrespective of their nationality or legal status. During registration, basic biographic data will be collected, including last name, first name, gender, date of birth, in addition to biometric data (*e.g.*, facial image, iris, fingerprints). Based on collected data, validation and verification, de-duplication (using ABIS software) will be performed to generate a UNI. UNIs are unique, random and unintelligible, not containing any logic that might reveal personal or identifying characteristics, such as nationality and ethnicity. The UNI will be linked to biometric and biographic data. Biometric data will be stored in a separate, secure encrypted database to limit the possibility of any breach. The system will include an application programming interface (API) layer to connect to other systems, including authentication of identity credentials issued by social protection, health, financial service providers and biographic data updates. A data analytics and reporting module will be designed to analyze all transactions and requests made of the system. Supporting information systems investments for the *f*ID system will include the servers and network components to be hosted in a secure data center and a disaster recovery site to host various systems (*e.g.*, project monitoring system, registration, data processing, UNI-generation system, interoperability mechanism between *f*ID and CR systems, GRM). While the project will not finance any civil works, charges for renting space in a data center for primary and disaster recovery sites for the *f*ID systems would be in scope of the project. (*See* Figure 8.)

2.1.1 Elaboration of a National Strategy on Identification for Service Delivery

104. **This sub-component will finance each participating country's elaboration of a *National Strategy on Identification for Service Delivery* that will prioritize key services and authentication mechanisms that can be linked to the *f*ID system**. These strategies will be based on consultations with key stakeholders in each country and will include a list of services to be linked to each country's *f*ID system in the short, medium and long-term, in order of priority. The *Strategy* will be based on the needs and priorities of key stakeholders; the capacity and readiness of the various potential services for integration with the *f*ID system; the potential impact on end-users of each linkage; the need to demonstrate the utility of linkage to the *f*ID system in a diverse array of applications in the public and private sectors; budgetary considerations; and the availability of financing, including non-project financing. Country context (*e.g.*, considering internet connectivity, mobile network coverage, mobile penetration, digital literacy) will be considered in order to define the nature of the authentication platform and the specifics of the *f*ID credential, with a particular eye to ensuring inclusion and universal coverage. Usability of the authentication platform for the cross-border authentication architectures would also be considered in the strategy.

2.1.2 Development of a financial model to ensure sustainability

105. **A plan for the sustainable financing of the *f*ID system will be developed**. This sub-component will help design the most appropriate financing and revenue generation model for ongoing *f*ID system operations and maintenance in order to efficiently balance concerns of financial sustainability and universal access to *f*ID credential. These objectives

will be achieved with the explicit aim of supporting the development of an authentication-based revenue model that respects the nature of the *f*ID System Authority as supporting a public good in a service-oriented culture.

2.1.3 Creation of the fID system

106. **The *f*ID system will be developed to process and store registration data in compliance with industry-wide good practices on privacy-by-design, security, availability and performance**. The *f*ID system will provide identification and authentication services and will be interoperable with other relevant registries and databases (*e.g.*, CR system). It will be built on open standards and API's. It will also be compliant with technical, data and process standards for regional interoperability of *f*ID systems.

107. **The *f*ID system will generate and manage UNIs**. UNI generation will ensure uniqueness and randomness of assigned numbers. For newborns and children below a certain age (*e.g.*, 5 to 6 years, as decided by the government of the country), UNIs will be generated without biometric data, meaning that uniqueness may not necessarily be guaranteed. Biometrics will be captured at a later date, at which time the deduplication process will be completed.

108. **Biometrics will be captured for the purpose of unique identification and ongoing de-duplication of people in the *f*ID system**. Examples of biometric technology that the *f*ID system may employ are those based on fingerprints and iris recognition. The system will also include mobile access points for registration and authentication. Automated Biometric Identification System (ABIS) will be used for comparing the biometric of an individual with the biometrics of all the people in the *f*ID database to determine uniqueness known as 1:*N* matching. Processes and tools will be used to adjudicate records flagged as duplicates by the ABIS system.

109. **Standardized interfaces will permit functional registers and relevant service providers (*e.g.*, Social Protection, Finance, Health) to authenticate users' identities against the *f*ID system using biometrics and/or other authentication mechanisms (*e.g.*, one-time password (OTP), personal identification number (PIN), password)**. Biometric SDK ("software development kit") will be used for matching the biometrics of the user captured by the service provider with the biometric of the user stored in the *f*ID system database located using the UNI, referred to as 1:1 matching. For each country, procedures will be elaborated to deal with exceptional cases where biometrics cannot be captured. The authentication service can be designed in a manner to provide only a yes/no response and the *f*ID system will not share any information about the individual (biometric or biographic) during an authentication service request. The authentication service simply verifies whether the individual is who they claim to be by running a check against the *f*ID system database and proceeds to provide a yes/no response to the agency performing the authentication. In situations where a *f*ID-credential holder explicitly wishes to share their identity-related information for a KYC requirement (such as opening a bank account), only the biographic data from the *f*ID system can be shared (with the explicit consent of the individual). Conversely, the *f*ID system never knows the specifics of any authentication transaction.

110. **This sub-component will finance also a secure data center and backup center to host the *f*ID system**. The data center will host besides the *f*ID system, project monitoring systems, credential issuance systems, business intelligence, grievance redressal and the self-service interface. Both main and backup data centers will be procured and operated in line with international good practices for data security and applicable data protection laws in each country. While the project will not finance any civil works, charges for renting/leasing a data center and backup site for hosting the *f*ID system and supporting systems will be financed under this sub-component. The sites will focus on mitigating potential disaster risks and ensuring business continuity. Adequate redundancy to be put in place to ensure continuous

power supply and internet availability to enable continuous system functioning, with strict policies to facilitate authorized access to both the physical sites and to the data.

111. **Design of the *f*ID systems will also include the development of GRMs to collect and to respond to beneficiary issues with the implementation and rollout of *f*ID credentials**. The GRMs will be designed in line with international good practices, and will provide an avenue for all persons affected by the new *f*ID systems to file a grievance and be assured of its resolution. The GRMs will be linked to project management and monitoring.

112. **Policies will be developed to allow access to authentication services (via webservices/APIs) while maintaining appropriate access control and data privacy safeguards**. The sub-component will support the definition of Open APIs and standards to facilitate access to the *f*ID system by relevant public and private service providers (*e.g.*, Social Protection, Finance, Health). Policies will be developed detailing the types of service providers with permissions to link to the *f*ID system, use-cases, technical protocols for data transfer, appropriate data privacy safeguards, as well as penalties and sanctions for misuse of data.

113. **A mobile or web-based self-service interface will provide services to allow people to view their profile, authentication history and set their preferences**. The user interface will enable people to schedule appointments for *f*ID system-linked services, view their authentication history, request updates to their biographic data, provide feedback or seek grievance redress.

2.1.4 Development of authentication system

114. **Service delivery programs tend to authenticate individuals either through an offline check by visually comparing a name or a face to a paper or plastic card, or by electronically storing identification data on individuals, which results in the sharing and exposing of personal data**. However, authentication services offered by *f*ID systems rely upon a minimal, challenge-response approach that asks “yes-or-no: is-this-person-whom-they-say-they-are?”, thereby privileging the protection of the individual’s personal data. Such a minimalistic approach to data sharing helps to support data protection and privacy. Authentication levels for different social programs must be determined appropriately based on the level of risk rather than a one-size-fits-all approach; levels of authentication are the degree of confidence a relying party (*i.e.*, the service provider) can have in the identity authentication, based on the risk, authentication method and identity proofing. For low levels of risk, just one authentication factor may be required. For substantial levels of risk, at least two different factors may be required. For high levels of risk, there must be at least two different factors and added prevention against duplication and tampering. For example, for a financial transaction, at least two different authentication factors may be required. Authentication factors include: something you know (password or pin code), something you are (biometrics such as fingerprint and iris) and something you have (card, mobile phone, one-time password).

115. **A diversity of factors influence the choice of authentication systems and credential design**. Such factors include the LoA needed for authentication (high, substantial, low), internet coverage, mobile penetration, additional equipment required for authentication (*i.e.*, smart card readers, biometric readers and the smart cards themselves), digital literacy, design choice of neighboring countries (where most of the cross-border transactions would take place, services linked to the *f*ID system. For instance, a smart card or digitally signed bar/QR code can be used for offline authentication and would need a smart card reader, biometric reader (if it is biometric match on card) or bar code reader. With a basic credential, an online comparison of biometrics against the template of stored biometrics in the *f*ID system can be done by invoking the authentication service of the *f*ID system but would need online connectivity to *f*ID system and fingerprint reader. If the service provider has implemented or plans to implement a derived

credential, mobile identity credential, Mobile Connect or FIDO-based authentication could be considered as per country context and maturity of technology innovations.[162] Various authentication mechanisms can be adapted and adopted based on the innovations in authentication technologies. The LoA required for a transaction also determines the type of authentication mechanism to be used. For a high value transaction, biometric authentication or multi factor authentication would be used. By contrast, for simple transactions requiring lower assurance levels, a biographic authentication or mobile OTP-based authentication may suffice. Identity service providers could also switch from the default of online authentication to offline authentication in the instance that internet connectivity is poor or non-existent.

116. **Countries would need to define the LoA framework for each country and for regional interoperability similar to the one below based on the LoA framework adapted from NIST**. (*See* Table 14.)

Table 14: Level of Assurance Framework

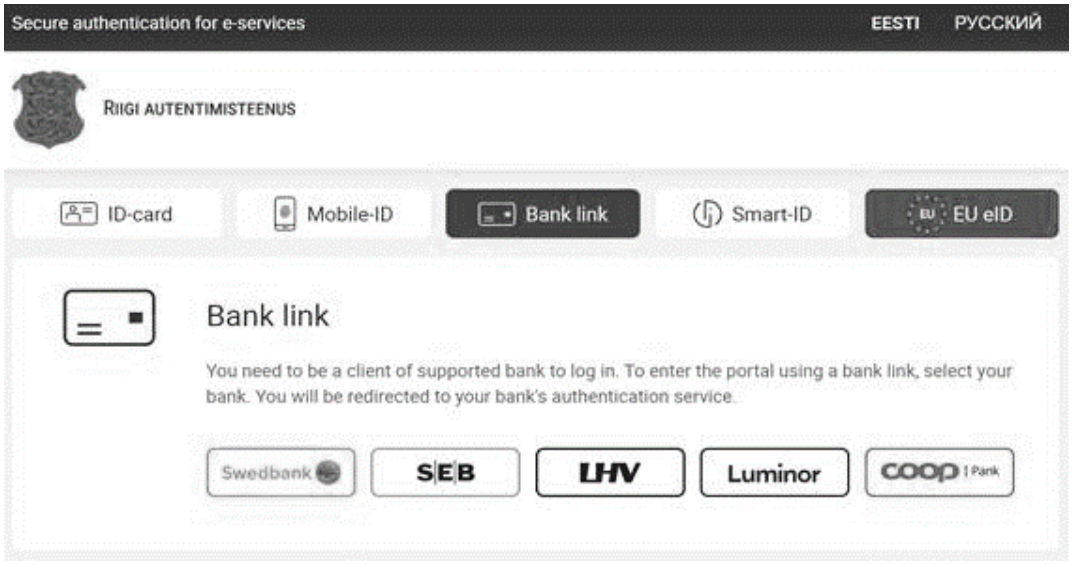
	Low LoA (Level 1)	***Substantial LoA (Level 2)***	***High LoA (Level 3)***
Identity Assurance Level (IAL)	**Self-asserted identity** (*e.g.*, email account creation on web), no collection, validation or verification of evidence.	**Remote or in-person identity proofing** (*e.g.*, provide credential document for physical or backend verification with authoritative source), address verification required, biometric collection optional	**In-person (or supervised remote) identity proofing**, collection of biometrics and address verification mandatory.
Authentication Assurance Level (AAL)	**At least 1 authentication factor**—something you have, know, or are (*e.g.*, password or PIN)	**At least 2 authentication factors** (*e.g.*, a token with a password or PIN)	**At least two different *categories* of authentication factors** and protection against duplication and tampering by attackers with high attack potential (*e.g.*, embed cryptographic key material in tamper-resistant hardware token + PIN, biometrics with liveness detection + PIN/smart card)
Federation Assurance Level (FAL)	**Permits the relying party to receive a bearer assertion from an identity provider.** The identity provider must sign the assertion using approved cryptography	**FAL1 + encryption** of assertion using approved cryptography	**FAL2 + user to present proof of possession of a cryptographic key** reference in the assertion
Level of risk taken by Relying Party	***Mitigated***	***Low***	***Minimal***

[162] World Bank. 2018. *Technology Landscape for Digital Identification*. Identification for Development. Washington, DC: World Bank Group. *http://pubdocs.worldbank.org/en/199411519691370495/ID4DTechnologyLandscape.pdf.*

117. **Countries can also adopt a federated identity management system with multiple Identity Providers providing identification and authentication services to various service providers (Relying parties)**. The derived ID providers can leverage the *f*ID system for identity proofing and provide their credentials and authentication services. A whole-of-government, federated, identity management system could be designed which would give users choice to register with multiple Identity Providers and can choose any one of the Identity Providers to establish their identity with a given service provider. This also protects the data privacy of the user, as no one Identity Providers has a complete view of the user digital transaction trail.

118. **Figure 9 illustrates the federated identity model operational in Estonia**. The Estonian authentication service used by the service providers allows the user to choose from one of the following identity credentials: NID card, mobile-derived, bank account identity credentials (of which the user may choose from various bank accounts) or smart-ID mobile app.

Figure 9: Federated Identity Model



119. **In order to develop a robust authentication service, the sub-component will comprehensively detail the roles and responsibilities of the key entities in the authentication lifecycle**. Those entities include the partners and agencies using authentication and KYC services and intermediaries; engagement models between the entities; authentication mechanisms, standards and protocols; security and interoperability controls and practices; and contracts and agreements between the entities.

120. **The sub-component will also broadly detail the usage scenarios for the *f*ID system authentication service(s).** Those services will include (a) establishing proof of presence for confirming beneficiaries of social safety net programs, or before enabling financial transactions such as funds transfer, withdrawal, among others; (b) establishing KYC credentials and biographic data verification; and (c) using the *f*ID credential as a common unique identifier to clean up/link beneficiary accounts across social sector schemes.

121. **Investment in equipment will be needed for onboarding and authentication at the service delivery points like biometric devices, bar code readers in order to ensure a successful rollout among services**. Depending on financing needs, the Project will provide targeted support for acquiring equipment necessary for authentication processes.

Sub-component 2.2: Registration

2.2.1 Registration en masse of persons

122. **The *f*ID system will initially be populated via a mass registration campaign carried out at the national level in each country**. All persons in the territory of the country will be able to register, irrespective of, and without accounting for, their nationality or legal status. There is no charge for registration in the *f*ID system. Since a mass registration requires a one-time mobilization of significant numbers of human resources, the registration strategy will need to be tailored to the specific needs of each participating country.

123. **The registration strategy will be based on a ESAMP to reach and safeguard vulnerable populations, and to mitigate physical and behavioral barriers to participation**. This includes, for example, issues of limited mobility and thus limited ability to travel to registration locations. The project will mitigate access barriers by registering people as close to their dwellings as technically feasible. In particular, the project will explore the possibility offline solutions for registration using mobile devices to reach communes without electricity and/or telecom network coverage.

124. **Where possible, online solutions for registration will be used to ensure deduplicated UNIs are provided on the spot**. Registration software will be configured to perform quality checks of incoming biometric data in real-time to facilitate the re-capture poor-quality data while registration teams are still in the field, avoiding costly repeated registrations. Furthermore, policies governing the *f*ID system will elaborate exception protocols for registering persons whose biometric data is difficult to capture (*e.g.*, due to missing fingerprints, cataracts, personal objection). Additionally, registrations may be also carried out at social safety net paypoints, schools, hospitals, banks, mobile money agents and other social service providers to ensure that beneficiaries are not denied public or private benefits or services for lack of a UNI.

125. **Adoption of Open Standards will promote interoperability and avoid vendor lock-in**. Technical standards for biometrics, QR code, encryption, digital signatures and the sort[163], as well as data and process standards will be defined to ensure interoperability, portability and quality/robustness of data in the *f*ID system.

2.2.2 Facilitating ongoing registration and data updates

126. **Ongoing registrations will be carried out by the *f*ID System Authority, following the mass registration process, with associated training, capacity building and knowledge transfer**. Procedures for continuous registration in the *f*ID system will be developed, which will include the establishment of permanent registration points as well as the deployment of mobile registration units on a periodic basis, particularly in remote and difficult-to-access areas. While the initial mass registration campaign will aim to capture the entire "stock" of persons physically present in the territory of participating countries at that point in time, additional and ongoing registration will be required to capture the "flow" of persons on a continuous basis, such as newborns, migrants, nationals residing abroad and any others who were not covered by the initial mass registration effort.

[163] World Bank. ID4D, *Technology Landscape for Digital Identification*.

127. **Clear and easy to access procedures and mechanisms will be established to enable registrants to update their biometric and biographic data if necessary**. Replacement of lost *f*ID credential and other related services will also be available to the users through permanent service points and other channels (*e.g.*, online, via SMS).

Sub-component 2.3 Issuance of *f*ID credentials

2.3.1 Systems for production of fID credentials

128. **The Project will finance systems to produce basic physical and digital identity credentials (*i.e.*, a *f*ID credential-linked UNI) provided at no cost to people who have registered**. The system infrastructure will include printers and additional equipment and software necessary to generated *f*ID credentials as well as all software applications linked to processing requests (*e.g.*, request, production, quality control, delivery, payment). *f*ID credentials will be produced using open standards to ensure sustainability and avoid vendor lock-in.

129. **Following registration, the system will issue a *recipisse* or receipt with a unique registration acknowledgement number**. Provided there is internet connectivity, deduplication will be performed at the time of registration and the UNI as well as the basic *f*ID credential will be issued on the spot. Where there is little to no internet connectivity, physical *f*ID credentials will be disseminated through a credential dispatch and distribution process based on the specific country context.

130. ***f*ID credentials will display the assigned UNI and will feature a machine-readable code (*e.g.*, bar code, digitally signed QR code) and selected additional variables, depending on the country context, safeguards and considerations for privacy**. *f*ID credential could be made available in a mobile app, or as an electronic file /bar code which can be stored on any device including in the cloud. The *f*ID credential will permit authorized agents using a compatible biometric terminal or applications (desktop or mobile app) to facilitate authentication of individuals (both online and offline mode) to allow access to services. Alternate innovative, inclusive and cost-effective credentials form factors could be considered for the *f*ID credential; leveraging mobile technology (*e.g.*, OTP, mobile app, mobile connect[164]) could also be considered as alternates or additional credentials.

2.3.2 Distribution of fID credentials to all persons registered in the fID system

131. **After registration in the *f*ID system and generation of the UNI, a low-cost (*i.e.*, not smart) physical *f*ID credential will be issued and distributed to recipients at zero-cost**. The *f*ID credential may also be downloaded from the portal (based on design of credential) or through other administrative mechanisms or issued on the spot during registration process, if feasible.

Sub-component 2.4 Link with CR systems for sustainability

132. **This will entail laying the groundwork for automating CR systems and designing an interoperability mechanism to ensure the flow of data on births and deaths to the *f*ID system for sustainable operations**. Policies and protocols will be elaborated to allow interoperability between *f*ID and CR systems. Data from the *f*ID system, in compliance with the institutional and regulatory provisions with regard to data sharing amongst systems and with user consent, could be leveraged by the project and/or other sources of financing (*e.g.*, EU, AFD, AfDB) to guide special operations to deliver late birth certificates. If the country elects to finance the issuance of late or delayed birth certificates for

[164] World Bank. 2018. *Catalogue of Technical Standards*. Identification for Development. Washington, DC: World Bank Group. *http://pubdocs.worldbank.org/en/199411519691370495/ID4DTechnologyLandscape.pdf.*

individuals not already in the CR, it will do so separately from a registration sweep *en masse* that populates the *f*ID system.

2.4.1 Provision of UNIs to newborns and individuals newly-registered in the CR System

133. **This sub-component will finance the issuance of UNIs to newborns**. This will facilitate the automatic registration of individuals in *f*ID system and issuance of UNIs by *f*ID system to newborns at birth or at a later date. The project will work with donor partners (*e.g.*, EU, AFD, AfDB), who may finance major aspects of a digital CR system that automates the processes and functions of civil registration.

2.4.2 Elaboration of technical protocols and policies

134. **Technical protocols and policies will be elaborated to allow interoperability between *f*ID and CR systems**. These technical protocols and policies will allow for data transfer between *f*ID and CR systems and support and reinforce the above legal framework (*e.g.*, data protection and privacy safeguards, sanctions, penalties for misuse). Interoperability between *f*ID and CR systems will ensure that, going forward, the uniqueness of civil records can be assured using the UNI.

2.4.3 Assessment of existing civil registries

135. **Completion of an inventory and evaluation of the state of the existing CR system, including civil registers and archives, assessing the feasibility of digitization**. A budget and strategy will be drawn up for the development of a digital CR system, digitization of the stock of CR records, taking into account the relatively poor condition of the current civil registers. As the project will not finance the digitization of stock, the strategy for digitization will include alternate sources of financing for relevant aspects.

COMPONENT 3: FACILITATING ACCESS TO SERVICES THROUGH *f*ID CREDENTIALS (TG US$17.5 million; BJ US$16.5 million; BF US$11.0 million; NE US$11.0 million)

136. **To incentivize take-up of the *f*ID credentials as a means of facilitating access to services, Component 3 will link the *f*ID systems to ongoing national social protection, financial inclusion, health and education programs, as well as to other service provider systems**. Both programs have social registry information systems with plans to adopt the UNI in the future, once available, as they presently rely upon less robust, functional identity credentials for deduplication of registered individuals in the system and for authentication of beneficiaries at pay points. The Project will implement an interoperability mechanism to provide linking/integration of the *f*ID system with service providers information systems for sharing of data, while also assuring the application of appropriate privacy, data protection and user-consent policies. An Executive Order or Memorandum of Understanding will govern the data exchange protocols between systems. Linking to the safety nets program is to serve as a good-practice example and to encourage other services to develop their own linkages with the services of the *f*ID system. Provided availability of financing, other potential services that could be linked to the *f*ID system under this Component include health sector services (*e.g.*, patient tracking), mobile communications (*e.g.*, identification for SIM card issuance) and financial services (*e.g.*, KYC for account opening).

Sub-component 3.1: Communications and outreach

3.1.1 Development of a communications strategy

137. **A strategy for communicating with beneficiaries on accessing services using *f*ID credentials will be developed, with particular emphasis placed on groups previously excluded from these services due to lack of government-recognized identity credentials and closing gender gaps in each of the countries**. Creating a digital linkage between databases of service providers and the *f*ID system for the purpose of authenticating identity is unprecedented in four countries. While this new functionality has significant potential to improve service delivery—especially to vulnerable populations and groups that have historically been excluded—doing so also represents a significant departure from the status quo. Service-delivery entities will play a key role in the communication campaign, especially *vis-à-vis* groups previously incapable of accessing services.

3.1.2 Awareness-raising campaign

138. **Awareness-raising campaigns outlining rights and responsibilities of registered persons will be developed and implemented as part of the project communications strategy**. The project will aim to deliver *f*ID credentials to populations that may never before have been had identity documents. In order to maximize individual and communal participation—and thus to increase eventual *f*ID system coverage—it is essential that the benefits of the *f*ID system, as well as its inclusiveness, be effectively communicated well in advance of registration drives. It is also essential that the populations understand their rights and responsibilities under the new *f*ID system. The communications campaign will effectively outline service standards, explain the process of delivering *f*ID credentials (from intake and registration to receipt of credentials), and will address concerns about privacy, data protection, costs, inclusiveness and benefits to end users. The campaign will also introduce and regularly remind people of the existence of the GRM systems.

3.1.3 Information, Education and Communication (IEC) campaign for registration

139. **A number of factors could affect participation in the mass registration campaign and enrollment in the *f*ID system more broadly that will need to be mitigated**. These include perceived negative personal consequences of registration; association of the registration campaign with past registration drives (*e.g.*, electoral registration); perception that there is no personal benefit to registration; and direct and opportunity costs of registration (*e.g.*, travel, transport). The project will mitigate such behavioral barriers whenever possible by investing in measures such as communication campaigns and incentives to entice individuals and their families to register while informing them about their rights and the protection of their privacy. The project will draw on work done under an Rapid Social Response (RSR) program, as well as a study on ethnographic research and human-centered design for around identity credentials, as well as an Innovation Challenge for the region. The project will also leverage the learnings of development partners such as UNICEF, UNHCR and the GFF, which are piloting mitigation measures for behavioral barriers to birth and death registration in partnership with local governments.

140. **A communications campaign to raise awareness about the functionality of the *f*ID system for accessing services will be carried out**. The design of the communications campaign will draw on the country communications strategies and will be adapted to permit communication with the various groups targeted in the strategy, including vulnerable groups such as illiterate persons and linguistic minorities, who will access these priority services (*e.g.*, social safety net, health). A mass communications campaign will ensure that individuals are aware of the ways they can benefit from the new linkages to the social safety nets program and other key services to maximize demand for the *f*ID system-linked services.

Sub-component 3.2: Integrating the *f*ID system and service delivery systems

3.2.1 Design and implementation of interoperability of fID systems

141. **This sub-component will finance technical assistance for the design of the social registry, and implementation of linkages between the social registry's information systems and the *f*ID system for eligibility assessment**. It will also finance technical assistance for the implementation of one or more services that use the *f*ID system for unique identification, based on the recommendations of the *National Strategy on Identification for Service Delivery*, developed under Component 2.

3.2.2 Development of systems to facilitate administration of services using the fID system

142. **The social information system will receive support to build software components to integrate with the *f*ID system, link existing user data record in the service provider system with the *f*ID system and components depending on the model(s) adopted for authentication, and train staff**. The precise nature of allocated support given will depend on the presented needs, with every effort being made to assure that other financing sources, including other donors and the private sector, are not crowded-out.

143. **As private sector usage of the *f*ID system raises additional and different data security, privacy and surveillance concerns, the *f*ID system will allow for randomly-generated tokens, that map to the UNI, to be used for accessing certain services**. Doing so will provide an additional layer of data privacy, thereby limiting the possibility of capture and storage of the UNI—and its association with other datasets—by private sector companies.

Sub-component 3.3: Regional integration/linking of *f*ID systems

144. **The ECOWAS Member States would collaborate and develop a Regional Interoperability framework for cross-border access to services in the region**. This includes developing the trust framework and the levels of assurance framework. Each of the countries would implement the framework for mutual recognition and interoperability of *f*ID systems for enabling users to access cross border services.

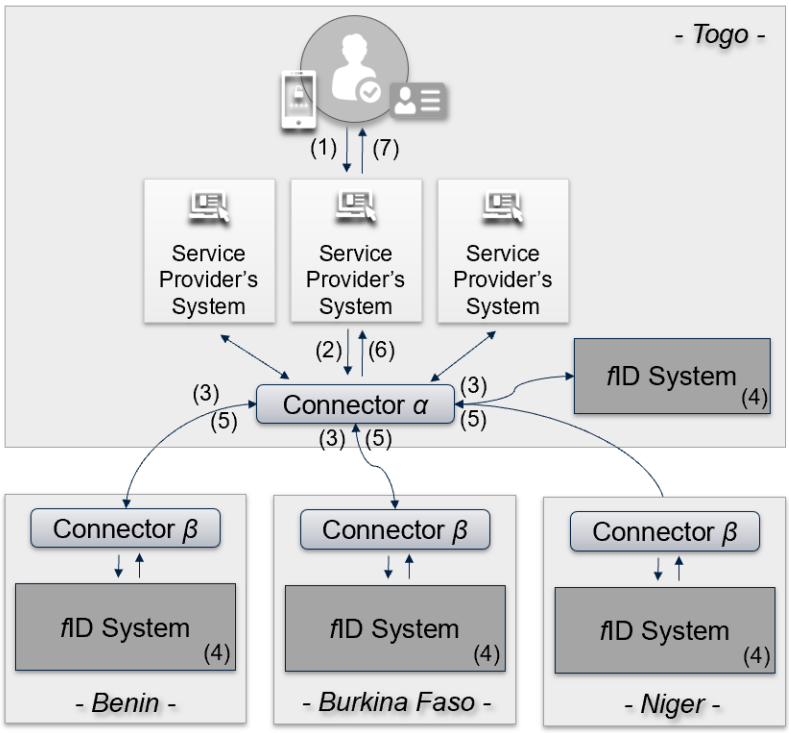
3.3.1 Development of the technical architecture(s) for regional integration and interoperability

145. **Technical architectures for regional integration and interoperability[165] can be evaluated by the countries for adoption facilitated by ECOWAS Commission**. Online architecture can be based on the eIDAS[166] model used in the EU region or based on authentication using API. Offline architecture to address authentication requirements without internet connectivity can be based on the biometric passport authentication model used by International Civil Aviation Organization (ICAO).

146. **The eIDAS architecture of the EU region is based on the federation protocols (SAML/Open ID Connect) and facilitates use of online authentication for accessing cross border services oblivious to the physical location/presence of the user**. The user's browser is redirected from the service provider website to the identification system portal and after authentication, the authentication result is directly sent by the identification system to the service provider through a back channel. The below diagram shows a high-level architecture for the online authentication workflow. (*See* Figure 10.)

[165] *See* the regional interoperability use-case and architecture report of ID4D.
[166] Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC).

Figure 10: Web-based Mutual Recognition (example of architecture and workflows for online authentication)



1. User provides his UNI and country (*e.g.*, Togo). (User may also provide biometrics, based on credential choice and authentication protocol.)
2. Service provider (*e.g.*, health, education, banking) sends request to Connector *α*.
3. Based on selected country, Connector *α* sends the request either direct to that country's *f*ID system, or to Connector *β* (that of the user's country).
4. Authentication of user by *f*ID system (*e.g.*, by fingerprint matching), and response (yes/no) returned (predefined and agreed-upon data fields (*e.g.*, name) may also be shared).
5. Connector *β* forwards response to Connector *α*.
6. Connector *α* forwards response to Service Provider.
7. Service is provided if authentication is successful.

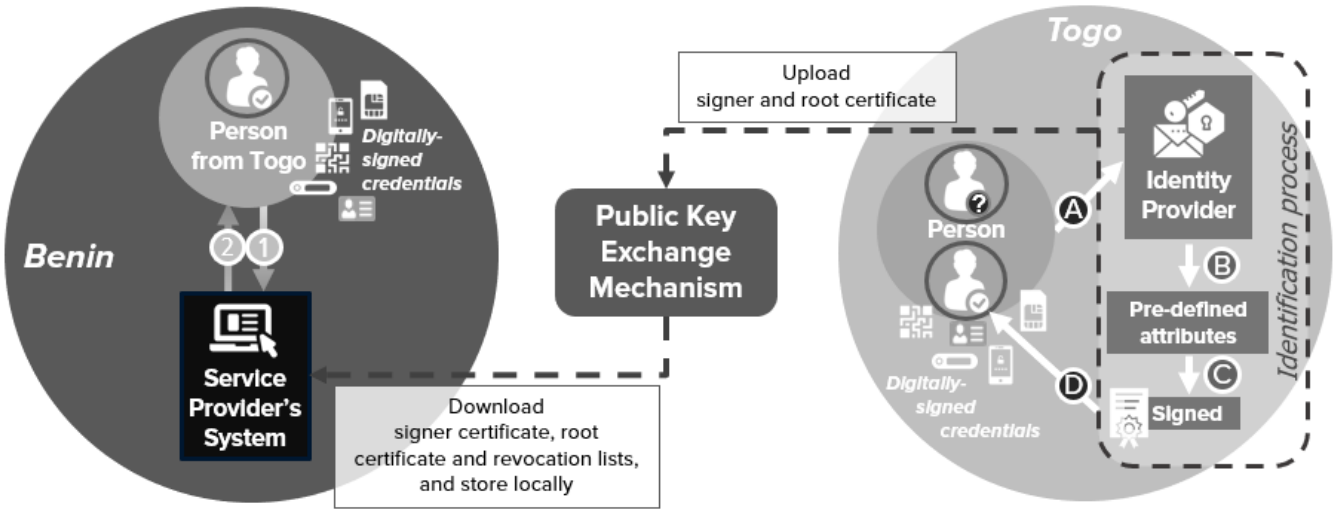
147. **A variation of the above, API based architecture would not use federation protocol, but leverages the API for online (*e.g.*, biometric, OTP) authentication for access by other countries to cross-border use cases**. This architecture enables in person, high assurance online biometric based authentication with internet coverage at the service delivery point. It could also be used for in person or remote (presenceless) mobile, identity-based authentication. Where possible, common standards and guidelines, as convened by the ECOWAS Commission, will be followed to allow for regional integration of systems.

148. **Architectures for offline authentication for domestic and cross-border service access in the ECOWAS region can be based on the digitally signed credential)**. The offline authentication architecture allows the user to carry the digitally signed credential in various form-factors, such as mobile phone, smart card, tablet, QR code printed on paper, computer or stored in the cloud. Figure 11 shows the architecture and authentication work flow for the offline architecture.

149. **Digitally-signed credentials enable both online and offline authentication by verifying the digitally-signed data on a credential with a public key**. A similar architecture is in use for the International Civil Aviation Organization (ICAO) electronic passports. A public key exchange mechanism allows for the public keys of each country's system to be shared. This mechanism can be elaborated and defined in due course and can range from mutual exchange of public key certificates by countries (regardless of the exact means) to the creation of a public key directory, as done for biometric passports under ICAO certificate-sharing model.

150. **Authentication can take place in offline situations**. Offline mutual-recognition architecture requires that any attribute that will be used in a credential to establish identity is predefined by the *f*ID System Authority, in coordination with the interoperability framework of other countries. The data is then digitally signed using the private key of the *f*ID System Authority. Relying parties (*i.e.*, service providers) obtain the public key (*i.e.*, signer) and root certificate through trusted channels of a public key exchange mechanism, and them store locally—that is, so the credentials are recognizable at the point of service using the service provider's system—in order to provide authentication as and when the end-user requests a service. The relying party compares the face/biometric of person physically present with that stored on the digitally-signed credential, verifies the authenticity and integrity of the digital signature with the public key and then relies on the attributes present in the credential in order to establish the identity of the user. (*See* Figure 11.)

Figure 11: Mutual Recognition (example of architecture and workflows for offline authentication)



3.3.2 Implementation of the regional integration architecture

151. **This sub-component will finance the linking of the *f*ID system of each participating country via regionally-interoperable components of the *f*ID systems of other participating countries**. While certain, common components of the regional interoperability architecture (*e.g.*, the connector, that is, the eIDAS node of EU architecture) may either be developed through regional cooperation, others might be developed by one country and then adopted by other participating countries. The project will finance exploration and ideation for what components will be common, the setting of shared standards for *f*ID system for mutual recognition of *f*ID credentials, and the examination and selection of potential services to interoperate. A coordinating Regional Supervision Committee will be established, including leadership and representatives from each country, to guide regional engagement on the project. Each country will select legal, policy and technical representatives to ensure ongoing regional dialogue to ensure the policies and protocols are in place to ensure mutual recognition of *f*IDs credentials across countries. The project will support these discussions through the provision of technical advice and assistance on regional interoperability solutions, regional monitoring and progress reviews.

ANNEX 3: PHASE 2 COSTS

COUNTRY: Western Africa

West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program - Phase 2

COSTS AND FINANCING OF PHASE 2 OF THE PROGRAM

A. Program Costs

Program Components	Project Cost	IBRD or IDA Financing	Trust Funds	Counterpart Funding
PROGRAM COMPONENT 1 – STRENGTHENING THE LEGAL AND INSTITUTIONAL FRAMEWORK	42.5	42.5	0	0
PROGRAM COMPONENT 2 – ESTABLISHING ROBUST AND INCLUSIVE FOUNDATIONAL ID SYSTEMS	174.5	174.5	0	0
PROGRAM COMPONENT 3 – FACILITATING ACCESS TO SERVICES THROUGH *f*ID CREDENTIALS	56.0	56.0	0	0
Total Costs				
Total Phase 2 Costs	273	273	0	0
Front End Fees	0	0	0	0
Total Financing Required	273	273	0	0

B. Country Costs

(i) Togo

Project Components	Project Cost	IBRD or IDA Financing	Trust Funds	Counterpart Funding
COMPONENT 1 – Strengthening the Legal and Institutional Framework	**14.3**	**14.3**	**0**	**0**
COMPONENT 2 – Establishing Robust and Inclusive *f*ID Systems	**40.2**	**40.2**	**0**	**0**
COMPONENT 3 – Facilitating Access to Services through *f*ID Credentials	**17.5**	**17.5**	**0**	**0**

(ii) Benin

Project Components	Project Cost	IBRD or IDA Financing	Trust Funds	Counterpart Funding
COMPONENT 1 – Strengthening the Legal and Institutional Framework	**6.0**	**6.0**	**0**	**0**
COMPONENT 2 – Establishing Robust and Inclusive *f*ID Systems	**22.5**	**22.5**	**0**	**0**
COMPONENT 3 – Facilitating Access to Services through *f*ID Credentials	**16.5**	**16.5**	**0**	**0**

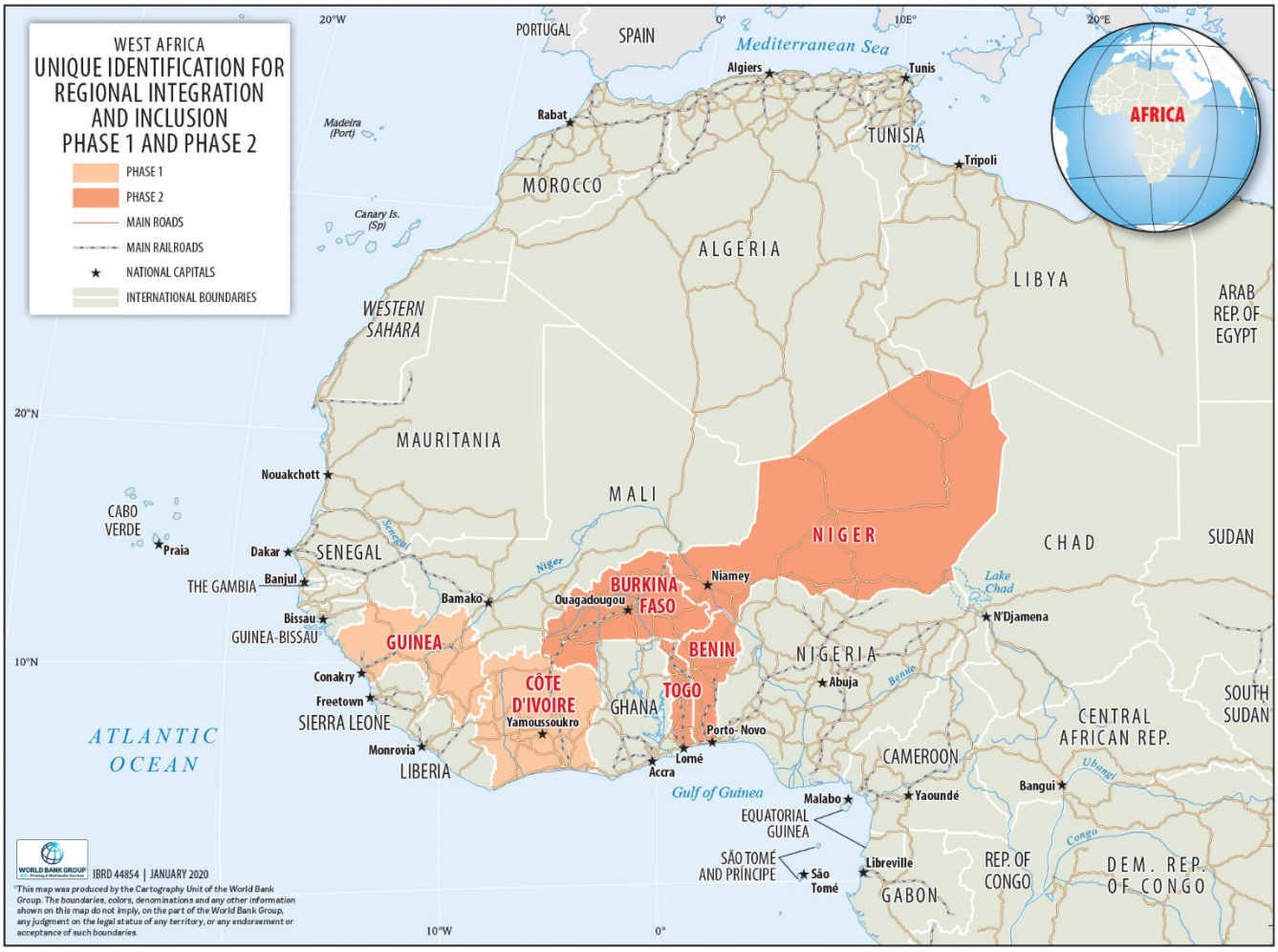
(iii) Burkina Faso

Project Components	Project Cost	IBRD or IDA Financing	Trust Funds	Counterpart Funding
COMPONENT 1 – Strengthening the Legal and Institutional Framework	**11.7**	**11.7**	**0**	**0**
COMPONENT 2 – Establishing Robust and Inclusive *f*ID Systems	**52.3**	**52.3**	**0**	**0**
COMPONENT 3 – Facilitating Access to Services through *f*ID Credentials	**11.0**	**11.0**	**0**	**0**

(iv) Niger

Project Components	Project Cost	IBRD or IDA Financing	Trust Funds	Counterpart Funding
COMPONENT 1 – Strengthening the Legal and Institutional Framework	**10.5**	**10.5**	**0**	**0**
COMPONENT 2 – Establishing Robust and Inclusive *f*ID Systems	**59.5**	**59.5**	**0**	**0**
COMPONENT 3 – Facilitating Access to Services through *f*ID Credentials	**11.0**	**11.0**	**0**	**0**

ANNEX 4: WURI PROGRAM REGIONAL MAP

COUNTRY: Western Africa

West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program - Phase 2