ID4D
IDENTIFICATION FOR DEVELOPMENT

Engaging Civil Society Organizations (CSOs) for Successful ID Systems:
Guidance Note

WORLD BANK GROUP

Contents

About ID4D

Identification for Development (ID4D) combines global knowledge, cross-sectoral expertise, financial and technical assistance, and partnerships to help countries realize the transformational potential of digital ID and civil registration ecosystems. The goal of this initiative is to accelerate inclusive growth and the achievement of a wide range of development outcomes by enabling all people to access more and better services, as well as exercise their rights. Today, ID4D is supporting 49 countries, in addition to shaping more than US$1.5 billion in pipeline or committed financing for the implementation of digital ID and civil registration ecosystems in 35 of the participating nations.

ID4D has become a thought leader and knowledge hub on why ID matters for development, how to build good ID and civil registration ecosystems, and tracking of impact and progress. The initiative is comprised of various parts of the World Bank Group, which focus on digital development, social protection, health, governance, gender, social inclusion, legal, financial and private sector development, regional integration, data, and forced displacement. ID4D has also leveraged intellectual partnerships with the Bill & Melinda Gates Foundation; the Norwegian Agency for Development Cooperation; the Omidyar Network; and the governments of France, and the United Kingdom. A high-level advisory council supports advocacy and provides strategic guidance, in addition to a technical experts group of experienced practitioners who provide leading-edge advice.

To find out more about ID4D, visit www.id4d.worldbank.org

Acknowledgments

Abbreviations

COSP	Conference of States Parties
CRPD	Convention on the Rights of Persons with Disabilities
CSO	Civil Society Organization
DHA	Department of Home Affairs
DPIA	Data Protection Impact Assessment
ESF	Environmental and Social Framework
ESSA	Environmental and Social System Assessment
GPSA	Global Partnership for Social Accountability
GRM	Grievance Redress Mechanism
IA	Impact Assessment
ICT	Information and Communications Technology
ID	Identification
ID4D	Identification for Development Initiative
IEC	Information and Education Campaign
IPF	Investment Policy Financing
IRD	Inclusion Registration Department
KICTANet	Kenya ICT Action Network
LGBTI	Lesbian, Gay, Bisexual, Transgender, and Intersex
LIC	Low-Income Country
LMICs	Lower-Middle-Income Countries
M&E	Monitoring and Evaluation

MCMC	Malaysian Communications and Multimedia Commission
NDID	National Digital Identity
OSJI	Open Society Justice Initiative
PETs	Privacy-Enhancing Technologies
SATS	Social Accountability in the Judicial Sector
SDG	Sustainable Development Goal
SOGI	Sexual Orientation and Gender Identity
SRU	Strategic Reform Unit
TOR	Terms of Reference
UNHCR	United Nations High Commissioner for Refugees
WB	World Bank
WBG	World Bank Group

Summary

The success of ID projects goes beyond technology—people need to understand and trust the ID system, and governments require information to monitor, evaluate, and improve implementation. If a system is poorly designed and does not reflect the needs and views of the communities it is intended to serve, this can lead to inefficient solutions, trust deficits, low adoption, and exclusion of marginalized groups.

Systematic engagement can help improve outcomes for both government and population by fostering confidence and providing early identification of potential problems. The importance of developing ID systems based on inclusion, trust, accountability, and transparency has been recognized by the international community in the Principles on Identification for Sustainable Development.[1]

This guidance note aims to inform practitioners undertaking civil registration and ID system projects about the benefits and importance of proactively and meaningfully engaging with civil society organizations (CSOs). Practitioners will also be equipped with leading practice tools and resources to effectively engage CSOs from design to deployment.

The information contained in this note is intended to complement World Bank frameworks on stakeholder engagement, which explain how to consult intended beneficiaries and adversely affected populations as part of the planning, design, and implementation of ID projects. This discussion focuses on the specifics of engaging with CSOs, following the request for further guidance formulated by CSOs and ID authorities themselves; these organizations act as an important intermediary to provide a voice to communities and segments of the population that lack a platform or sufficient organization to influence public decisions.

ID authorities will gain a deeper understanding of the following key points:

- **Why engage with CSOs:** It is imperative to understand the necessity, benefits, and opportunities of meaningful engagement with civil society organizations for successful ID systems. This note explains the importance of changing the ID practitioner's mindset from one-way communication to more collaborative approaches, based on solicited consultations and opportunities for continuous feedback. Active engagement helps to create an environment of trust and a wider understanding of the system's value and appropriate role in beneficiaries' daily lives. Furthermore, it ensures that the system is inclusive and designed to meet real needs, as well as allows for continuous improvement of processes and services linked to the ID system.

- **When to engage with CSOs:** ID authorities must identify the key themes and milestones across ID system design and implementation where CSOs can be consulted during each phase of an ID project lifecycle. One of the most critical elements for successful engagement is to institutionalize CSO engagement to ensure that the beneficiaries are continually engaged from the inception of the project; a clear process for engagement should be outlined and upheld, and expectations well-managed with regard to opportunities for input at each of the different stages of the project cycle.

- **How to engage with CSOs:** ID4D provides guidance on how to structure outreach and engagement with CSOs. This note suggests steps that can be followed by ID authorities as they move through ID system planning, design, and implementation, and presents tools and resources that can support this journey. In all circumstances, it is important to consider how engagement with CSOs can be institutionalized and incorporated across all elements of the ID system design and deployment.

---

1   For more information, see: Principles on Identification for Sustainable Development: Towards the Digital Age and https://id4d. worldbank.org/principles

Introduction

Context

Ensuring that everyone has access to a legal identity is the key objective of the Sustainable Development Goal (SDG) Target 16.9: "By 2030, provide legal identity for all, including free birth registrations." It is also a key enabler to many other SDG targets, such as financial and economic inclusion, social protection, healthcare and education for all, gender equality, child protection, agriculture, good governance, and safe and orderly migration.

Building an Identification (ID) system that meets developmental goals is a multifaceted challenge in any context.[2] It is critical that ID authorities planning such systems clearly assess and mitigate potential risks, including those related to data protection, discrimination, and exclusion, as well as the long-term financial and operational sustainability of the developed systems.[3]

For these reasons, the international community has developed the Principles on Identification for Sustainable Development (box I.1), which advocate for the importance of inclusion, trust, accountability, and transparency as the foundations of ID systems. The ultimate aim of these principles is to develop ID systems that are beneficial for people; approaches should support—rather than undermine—the fulfillment of rights and access to services, and contribute to the progress of SDGs.

Box I.1: Principles on Identification for Sustainable Development

More than 30 organizations have endorsed a set of shared principles that are fundamental to maximizing the benefits of identification systems for sustainable development while mitigating many of the risks.

By applying these 10 principles, structured around three pillars – Inclusion, Design, and Governance – stakeholders involved in ID system projects can better align their actions according to a set of shared values and standards.

The principles emphasize the importance of continuous and proactive engagement of the public and civil society at multiple stages of design and implementation to ensure that these systems are inclusive, designed to respond to real needs and concerns, and governed well with independent oversight and accountability.

These principles highlight the centrality that consultation and community engagement play in the development of effective, pro-developmental ID systems. Building a good ID system requires consultation with impacted populations and communities throughout the process to ensure that different views and

---

2   Common types of ID systems include civil registries, universal resident or national ID systems, and population registers.
3   Primary providers of foundational ID systems are often government ID agencies, civil registrars, or ministries such as Information and Communications Technology (ICT), Interior, or Justice.

experiences are considered. ID authorities look to the principles to help inform data gaps and build trust in the system. It is also an opportunity for communities to build skills and knowledge around technology-related topics.

Many ID systems have been launched without active participation of the people who are intended to be the beneficiaries of the system, contributing to limited benefits for both the population and the government. If a system is poorly designed and does not reflect the needs and views of the communities it intends to serve, it will lead to inefficient solutions, trust deficits, low adoption, and exclusion.

Objectives of this Guide

This guidance note aims to inform practitioners undertaking civil registration and ID system projects about the benefits and importance of proactively and meaningfully engaging with civil society organizations (CSOs) and equip them with good practice tools and resources to engage CSOs effectively from design to deployment.

This note does not replace general World Bank frameworks on stakeholder engagement, which explain how to consult intended beneficiaries, as well as adversely affected populations; this includes civil society, other government agencies, relevant private sector organizations, academia, and financing institutions. It instead acts as a complement to understand the specifics of engaging with CSOs as part of the planning, design, and implementation of ID projects, following the request for further guidance formulated by CSOs and ID authorities themselves.

More specifically, this note aims to provide ID authorities with the necessary understanding regarding:

- **Why engage with CSOs:** Understand the necessity, benefits, and opportunities of meaningful engagement with civil society organizations for successful ID systems.
- **When to engage with CSOs:** Identify the key themes and milestones across ID system design and implementation where CSOs can be consulted during each phase of an ID project lifecycle.
- **How to engage with CSOs:** Provide guidance on how to structure outreach and engagement with CSOs, understand the constraints and challenges that CSOs may face, and present different methods of engagement relevant to ID projects at the national level.

Developed in collaboration with CSOs, the tools and recommendations provided in this guidance note build on the real-world experiences of both practitioners and CSOs. Two consultation workshops were organized: one in May 2021 to seek insights from CSOs on examples of leading practices of engagement on ID projects and how collaboration with the public could be strengthened, and a second one in May 2022 to validate the recommendations and ensure that they were aligned with CSO needs and expectations. In June 2022, the CSO guide was presented as part of an ID4D-organized workshop and training at the ID4Africa annual event in Morocco, which included dozens of representatives from African ID agencies, the donor community, and civil society. This session was followed by an ID4Africa Livecast, summarizing the outcomes of the discussions.[4] Further iterations of this document are expected to include additional examples and outcomes of engagement activities initiated by ID authorities in the coming years.

---

4 ID4Africa. 2022. "Livecast Episode 23: Workshop Reports featuring UNICEF & World bank." YouTube Video, 3:01:01. https://youtu.be/JoLpIwVwhQI?t=5446

Scope

The focus of this guidance note is on fostering civil society engagement around the planning, design, and implementation of ID systems that provide people with proof of their legal identity. The goal is to simplify their access to basic services, while upholding rights and protections. Examples include civil registration systems, national ID systems, and population registers. However, many lessons presented in this note could extend to other systems, such as functional ID systems or programs.

In the following sections, the term CSOs designates any non-profit, voluntary citizens' group that is organized on a local, national, or international level. This broad definition includes grassroots organizations, advocacy groups, and international NGOs, though governments are encouraged to extend consultations to other intermediaries, such as community groups, religious leaders, labor rights organizations, and other relevant local organizations. CSOs act as an important intermediary to provide a voice to communities and segments of the population that are often unheard or lack the organization to influence public decisions.

Although this guidance note has been drafted with practitioners who design and implement ID projects as a target audience, it can also be used by the entities supporting them, such as development actors, as well as CSOs themselves, to reference in their dialogue with ID authorities to ensure that diverse perspectives are taken into account in the development of legislation and policies.

As of 2018, all Investment Policy Financing (IPF) projects of the World Bank must comply with the stakeholder engagement requirements established by the Environmental and Social Framework (ESF).[5] This note is intended to provide a more granular view on how to apply the requirements stemming from the ESF and the corporate strategy framework in order to mainstream citizen engagement in World Bank operations[6] within the context of ID projects. As a result of these requirements, 100 percent of new investment projects today include at least one citizen engagement mechanism, and 98 percent include an indicator to measure beneficiary feedback, in comparison to the baseline of 27 percent in 2014.[7]

This guidance note aims to reach ID authorities beyond World Bank-financed projects and also complements other ID4D resources, including the Qualitative Research Toolkit[8], which provides a primer and tools for research to better understand people's experiences and needs regarding identification, and a forthcoming guide on developing an overarching communications strategy.

---

5   For more information about the World Bank Environmental and Social Framework, see the World Bank website at https://www.worldbank.org/en/projects-operations/environmental-and-social-framework.
    See also: Guidance Note ESS10: Stakeholder Engagement and Information Disclosure. https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf
6   For more information about how the World Bank mainstreamed and scaled up citizen engagement across its operations, see the Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group (WBG) Operations. https://openknowledge.worldbank.org/bitstream/handle/10986/21113/929570WP0Box380ategicFrameworkforCE.pdf?sequence=1&isAllowed=y
7   World Bank. April 2022. Citizen Engagement. https://www.worldbank.org/en/topic/citizen-engagement#3. Washington, D.C.: World Bank
8   For more information on Understanding People's Perspectives on Identity: a Qualitative Research Toolkit, see: https://id4d.worldbank.org/qualitative-research

From One-Way Communication to Active Engagement in ID Projects

Greater engagement requires a shift in mentality from a strategy centered on one-way communication where public authorities notify the impacted population about their unilateral decisions on the details of the ID project, to a more active engagement based on a two-way interaction between people—who can be represented by CSOs—and ID authorities. This in turn gives the public a stake in decision-making with the objective of improving the intermediate and final outcomes of the project.[9]

The intention of engagement activities is to **create a feedback loop between people and governments** to ensure that all voices have been heard and taken into account. This a three-step approach, starting with the sharing of information, then establishing the organization of channels of communications to provide solicited or continuous feedback, and finally culminating in the government reporting back to the public regarding decisions to close the feedback loop. This process is fundamental to meet citizens' expectations for change as created by their engagement, as well as to use their input to facilitate improved development outcomes and justify the cost of engaging with them.

Figure I.1: Closing the Feedback Loop
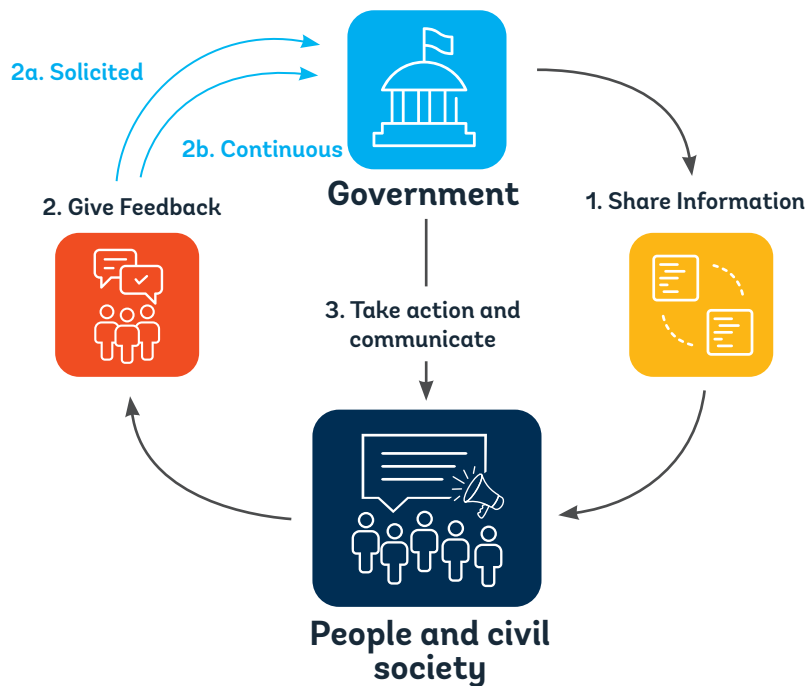
Public education and engagement are therefore essential. It can take multiple forms, from simple consultation to a more active partnership, where ID authorities continuously collaborate with CSOs to define their future ID system or improve existing ones. Old approaches consisting of offering mere information from stakeholders about the ID programs are not recommended unless the data is used as a preliminary step toward more active engagement, such as communication of key information with the goal of preparing consultations or collaborative workshops.

---

9   For more information about how the World Bank mainstreamed and scaled up citizen engagement across its operations, please see the Strategic Framework for Mainstreaming Citizen Engagement in WBG Operations. https://openknowledge.worldbank.org/bitstream/handle/10986/21113/929570WP0Box380ategicFrameworkforCE.pdf?sequence=1&isAllowed=y

Figure I.2: The Different Levels of Intensity of Engagement

Inform	Consult	Collaborate	Empower
"This is how the new ID system works"	*"Do you prefer if the ID system does A or B?"*	*"Let's sit together to develop a new ID system"*	*"You can make your own decision on aspect A of the ID project"*

Level of participation in decision making
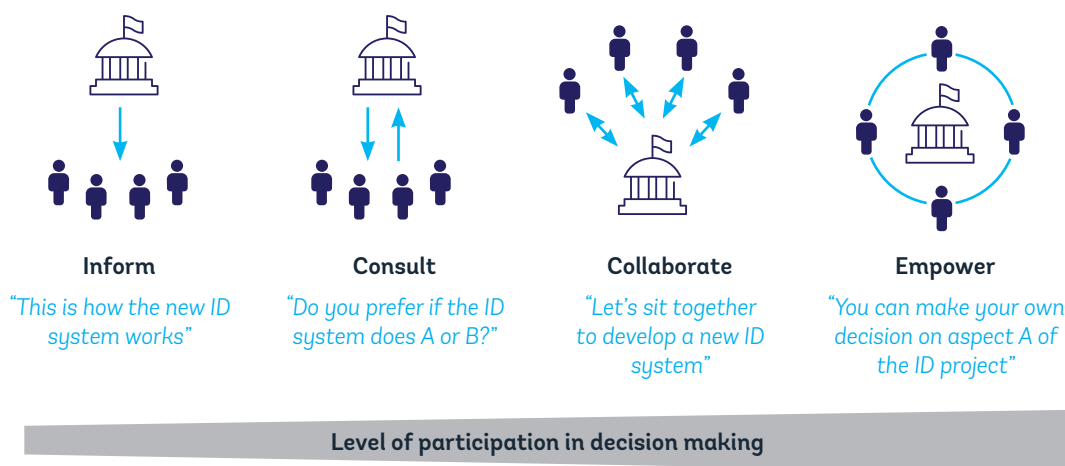
Source: World Bank

The World Bank Strategic Framework for Mainstreaming Citizen Engagement has defined four complementary levels of public engagement (cf. figure I.2). CSO involvement is particularly useful to relay feedback from the public when it is not always possible for individuals to stay actively engaged throughout the project.

- **Inform:** Corresponds to a one-way communication to provide information to the population about the ID project and its specifics. The public plays a passive role in receiving the information. When done correctly, it can be the first step to provide information to the public in order to enable them to prepare for future consultation. Disclosure of information at each stage of the ID project can help foster dialogue, build trust, and strengthen legitimacy and communication of the project, as it prepares for more meaningful consultations with the public.[10] However, broader public engagement requires more than just notification.

- **Consult:** Consists of actively seeking feedback from the public on the ID project design and implementation plan. It is particularly useful to identify unintended consequences of a project, as well as to identify potential points of conflict at an early stage and address them proactively. To increase the reach of such consultation, CSOs can facilitate the aggregation of opinions from impacted groups that would otherwise not have the means to participate in the dialogue. For example, ID authorities can invite the public and civil society to provide feedback on a proposed new regulatory framework on Digital ID.

- **Collaborate:** Means that ID authorities are engaging in a more structured dialogue with the public and CSOs to determine the objectives of the projects, the design of the future system, and the details of its implementation. The aim is to ensure that the project will actually address the problems of the impacted groups and create a sense of ownership for the participant. For example, through community engagement, policy makers can co-create processes and systems that would better address the needs of populations with specific challenges, such as persons with disabilities. CSOs can also collaborate with ID authorities during the registration procedure in rural areas to adapt the strategy to the given locality and ensure that vulnerable populations are not excluded.

---

10   For specific guidance on information and education campaigns (IECs) see the ID4D Strategic Communications Guide (forthcoming).

- **Empower:** Means that the public holds a final decision-making power over some elements of the project. Such a level of engagement requires people and CSOs to be deeply embedded into the project planning and oversight, such as through participation in steering committees.

It is important to acknowledge that ID authorities often face both time and financial constraints when developing an ID project, and in this context, engaging CSOs may seem complex due to lack of adequate skills and competencies. Engagement may also seem time consuming or be viewed as a potential roadblock to progress. Additionally, CSOs face constraints on resources and might be limited in their ability to contribute openly to discussions and decision-making, depending on the local social, political, economic, environmental, or cultural issues. Other factors, such as gender dynamics, may also influence open dialogue.

Nevertheless, a project will be more successful if it addresses problems and risks proactively rather than reactively, and with people's real needs and concerns at the forefront. When done purposefully and from the outset, CSO engagement has the potential to enhance the efficiency and effectiveness of an ID system by helping ID authorities to achieve improved development results and public service delivery. In cases where the network of CSOs is still nascent in a given country, initiatives from government authorities and the international community aimed at strengthening their capacity to participate in the engagement activities may be considered.[11] In the third chapter of this report, ID practitioners are also invited to explore key limitations from CSOs to express their insight and design engagement opportunities in as inclusive an environment as possible. This guidance note ultimately aims to support ID authorities in taking adequate steps to initiate such approaches.

---

11 For this purpose, the World Bank created the Global Partnership for Social Accountability (GPSA), whose role is to facilitate the collaboration of civil society organizations with governments. To achieve its goals, the GPSA provides programmatic, flexible grants to support coalitions led by civil society organizations for collaborative social accountability. For more information, see: https://thegpsa.org/

Why Engagement Matters for Good ID Systems

An ID system that is inclusive, trusted, and well designed to meet the needs of the local context can be a tool that empowers individuals and enhances their access to rights, services, and the formal economy.

Systematic assessment of a country's existing ID systems alongside an examination of its enabling laws and regulations, in addition to its institutions, are powerful tools to identify structural issues that may impede the inclusivity, security, and trust of existing and future ID systems.[12] An open and inclusive assessment process allows for CSOs and the general public to point out the barriers and issues to be overcome by the new scheme.

Unfortunately, too many ID and civil registration systems have been previously developed while disconnected from the needs of the population. These projects were often supported by one-way communication approaches, leaving little room for feedback and collaboration with impacted groups. When ID authorities do not include a strong, active public engagement within the framework of the ID project from planning and design to implementation, they face the following risks:

- **Distrust and a lack of project legitimacy** can directly affect the willingness of the population to register and use the system.
- **Exclusion:** The diversity of experiences and contexts within a population, paired with the complexity of an ID system, means that there are multiple risks to consider. Such factors include potential exclusion and marginalization of certain population groups, as well as threats to data protection and privacy.
- **Inefficient or ineffective outreach to marginalized communities:** Communities that are often the hardest to reach may also be the ones that would most benefit from access to public services. For example, in some countries, women may not be able to travel to the registration center or be comfortable signing up in certain circumstances, resulting in lower coverage of a large segment of the population.
- **Poor design or technology choices that do not meet people's needs:** Issues with the design of the ID project can either emerge from a poor design of the system itself, such as cumbersome eligibility requirements or inadequate technology, or from the way it is used and integrated into service delivery—for example, defining a specific ID as a prerequisite to access service without alternatives.
- **Lack of independent sources for implementation issues and grievances** reduces the capacity of the system to evolve and provide better service to the beneficiaries. Inadequate redressal mechanisms may lead the project to be legally challenged.

At the extreme, insufficient management of risks and the absence of active engagement to mitigate these issues early on reduces the positive benefits that ID systems can bring to the population and instead jeopardize the success of the ID system overall. In such cases, ID projects or system reforms run the risk

---

12 For more information, see the World Bank ID4D Diagnostic Guidelines https://id4d.worldbank.org/Diagnostic-Guidelines and ID Enabling Environment Assessment (https://id4d.worldbank.org/legal-assessment) frameworks.

of irrelevance and may adversely impact beneficiaries, resulting in distrust, bad publicity, challenges in court, and potential cancelation. While litigation is a legitimate part of the process of governing, and a key accountability mechanism that can actually raise public awareness and initiate change, legal processes are lengthy and expensive. Many of the issues raised in court regarding ID systems could have been addressed at the outset of the project by ensuring broad, early engagement and consultations.

The following section highlights the benefits of engaging in active participation with CSOs to help overcome these issues and ensure that ID systems are fit for purpose.

Increasing Trust and Legitimacy in the Project

Adopting a more open and active engagement approach from the inception of the project can have an immense impact on the future success of the ID system, helping to create an environment of trust and a wider understanding of the system's value and appropriate role in beneficiaries' daily lives. This sense of trust and value is a key driver of registration and the effective operation of ID programs with regard to meeting development goals.

Active engagement starts at the planning stage, when ID authorities are still working on defining the objectives and scope of the project, as well as throughout the legislative process (cf. box 1.1). A key success factor for an ID system is that it is trusted and valued by the people who will register and use it in their daily lives. Similarly, it is important for ID authorities to clearly define and articulate the objectives of the ID system, the guiding principles for design, and the departments and agencies that will be involved in driving the agenda and process. The motivation of individuals to register in ID systems is strongly linked with feelings of trust, perceptions regarding whether the purpose and objectives of the system are legitimate, and expectations of how the system might be used—or potentially misused. Engagement, transparency, and accountability are critical ingredients to building trust and legitimacy in a system.

Many CSOs have subject matter expertise and grass-roots knowledge and networks built up over many years that constitute a key source of information for strengthening the legal framework , such as advice on key safeguards to introduce, and for improving ID authorities' understanding of specific contexts and problems during the design and implementation of an ID system.[13] CSOs often have extensive research, data, and evidence on the topics and groups they focus on, which can add granular, rich insights as ID systems are being conceptualized. Furthermore, they can share their expertise to make the system more aligned with the needs of groups who may be particularly impacted by, or hesitant toward, the system.

---

13 World Bank. 2019. *Mainstreaming Citizen Engagement through the World Bank Group's Country Engagement Model*. Washington, D.C.: World Bank. https://openknowledge.worldbank.org/bitstream/handle/10986/34074/Mainstreaming-Citizen-Engagement-through-the-World-Bank-Group-s-Country-Engagement-Model.pdf?sequence=4&isAllowed=y

Box 1.1: Building Trust and Transparency During the Legislative Process

An inclusive and transparent legislative process is a foundation for building trust, accountability and confidence in an ID system. This is true especially where there are laws being drafted that impact human rights, data protection, and privacy. Many CSOs have expertise on these topics, and early engagement ensures that their input is included throughout the design and deployment of the ID system.

In 2020, South Africa launched a series of consultations with its communities as part of projects to revise its national identity system to be more inclusive. Consultations highlighted that in the current situation, non-binary or transgender individuals were excluded from the current ID system because of the use of a gendered identification number and the lack of ability to change the sex assigned at birth. It was also noted that abandoned children were excluded from civil registration because of the requirement for identifying details of the parents at registration.[14] Regulatory changes have since been introduced to address these accessibility and inclusion barriers

In Jamaica, a CSO coalition (https://nidsfocus.com/) led a constructive effort to review the ID legislation. This initiative demonstrated how CSOs representing a spectrum of positions with respect to different provisions can reach consensus positions and bring these to the government through the legislative process. Participating CSOs appreciated that their contributions have been reviewed publicly and that the legislators gave them space to participate in one of the hearings, even though all topics of interest to them could not be covered.

Ensuring that Systems are Inclusive and Protect Individuals' Rights and Data

Given their expertise and rootedness in specific communities or interests, CSOs can be highly effective in helping to identify potential risks before they become serious issues. By engaging CSOs at an early stage of the project design and implementation, ID authorities can gather more targeted insights on the needs of a particular population group.

ID authorities can also increase community buy-in and participation in the ID system rollout by collaborating with CSOs. For example, CSOs could support registration efforts by working directly with community groups on registration and ensuring that the registration is arranged in a culturally and contextually appropriate way that leads to increased participation.

In situations where there are literacy or language barriers, CSOs can help deliver key messages and ensure that there is broad, inclusive awareness of the purpose and limits of the system, as well as the technical elements or provisions for data privacy. CSOs, especially those working with vulnerable populations, enjoy a high level of trust. They can facilitate the translation of a national strategy to the local realities by engaging with governmental authorities, civil servants, and a range of local leaders, particularly in areas outside of major cities and towns. In instances where key information related to an ID system, such as legal requirements to register a birth within a certain time period, or stipulations for using the ID to access

---

14   The Department of Home Affairs (DHA), South Africa. 2020. Draft official identity Management policy, public consultation version. https://www.gov.za/sites/default/files/gcis_document/202101/44048gon1425.pdf

a particular service, is made via a press release, TV or radio announcement,[15] or social media, CSOs can help to ensure that this information is disseminated through multiple channels and networks, as well as explained to individuals or groups who may not have access to these information sources.

<div style="border:1px solid gray; padding:10px;">

Box 1.2: A Community-Based Practitioner's Guide: Documenting Citizenship and Other Forms of Legal Identity[16]
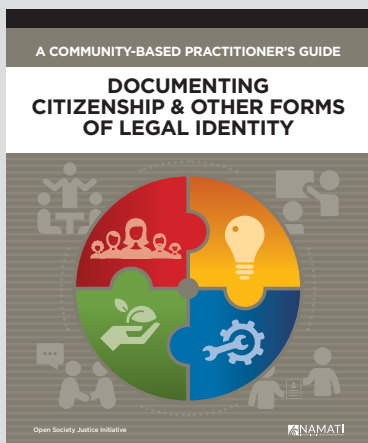
Namati and the Open Society Justice Initiative (OSJI), in cooperation with the United Nations High Commissioner for Refugees (UNHCR), provide step-by-step instructions for Civil Service Organizations (CSOs) on establishing paralegal or other community-based programs to help people obtain legal identity documents. The initiative helps practitioners to further rely on existing structures, such as village protection committees, faith-based organizations, or women's networks, that can contribute to the design and implementation of an ID project. The guide includes use case studies, infographics, and copies of actual data collection forms.

Namati notably explains how the guide helped communities in Kenya that faced difficulty obtaining proof of nationality by disseminating information on procedures and collaborating with UNHCR and statelessness working groups.

This guide also provides valuable descriptions of the ways in which various systems operate before digital IDs are introduced, as well as insights into the typical barriers that communities are facing, which should be addressed before digital systems are designed and rolled out. Without the long-term engagement of CSOs with local communities, it would be challenging to identify these barriers across diverse populations. By bringing CSOs together to identify solutions, more consensus-based, informed decisions can be reached about how to simultaneously safeguard rights and serve competing interests.

</div>

Designing Systems to Meet Real Needs

Understanding how people currently interact with existing ID systems, and their view on solutions to problems faced in the process, is vital for system designers and policy makers in the ID space. Ideally, communities will be consulted during the project-planning phase, as well as throughout the implementation life cycle in order to ensure that the system is responsive to evolving demands. The contribution of CSOs can include discussions around system use and also system features.[17] Many CSOs also have deep technical knowledge that could help ID authorities' counterparts to weigh options relating to various system design choices, technical specifications and select which ones are the most appropriate for the context and needs of the beneficiaries.

---

15 For an example of local radio outreach and how it enabled CSOs to raise awareness about the challenges experienced by people in Uganda with the Ndaga Muntu system, see the website of Nubian Rights Forum at https://www.nubianrightsforum.org/radio-program/

16 Namati, OSJI. 2018. A Community-Based Practitioner's Guide: Documenting Citizenship and Other Forms of Legal Identity. https://namati.org/resources/community-based-practitioners-guide-documenting-citizenship-legal-identity/

17 The Engine Room. 2022. Digital IDs Rooted in Justice: Lived experiences and Civil Society Advocacy Towards better Systems. https://www.theengineroom.org/community-call-digital-ids-rooted-in-justice/

Box 1.3: Engaging Women's Voices to Develop Community-Based Solutions to ID Challenges in Nigeria[18] [19]

The World Bank undertook extensive qualitative research in Nigeria to better understand the gender-related realities and barriers impacting women's experiences with the national ID. As part of this project, Nigerian participants in the research proposed multiple solutions that could help address the challenges faced by women and marginalized groups, as well as the population at large, such as:

1. **Assess prevailing cultural, social, and religious norm**s in the community to determine appropriate policies for encouraging women's registration; for example, hiring female registration agents, or holding separate registration for women and men.

2. **Ensure that male and female leaders proactively and publicly promote women's registration** and employ female leaders who are active in their communities to reach women with restricted mobility and limited access to information.

3. **Show the value of an ID for accessing critical services used by both women and men,** but ensure that non-possession of the ID does not exclude people from access to services.

These insights have directly informed the design of registration strategies and systems, as well as communication strategies for the National Identity Management Commission's ecosystem registration project, which aims to issue an ID to the majority of the population within five years.

For more information, please see: Barriers to the Inclusion of Women and Marginalized Groups in Nigeria's ID System: Findings and Solutions from an In-Depth Qualitative Study

Establishing Independent Resources to Provide Feedback, Address Grievances, and Create Social Accountability

Despite large consultations and engagement with civil society throughout the design and implementation of the ID project, it is expected that additional issues may arise during the project implementation and as more and more people use the system. It is therefore important to put in place "social accountability" mechanisms[20] and tools, including community scorecards, focus group discussions, and social audits to monitor the results and implementation of the project on a regular basis, such as quarterly or bi-annually.[21] CSOs can be core partners and implementors of such activities.

Grievance redress mechanisms (GRMs) must also be put in place to enable individuals to file complaints about any aspect of the identity lifecycle. This can include errors or misspellings in biographic information,

---

18 Hanmer, Lucia C.; Esquivel-Korsiak,Victoria; Pande,Rohini.2021. *Barriers to the Inclusion of Women and Marginalized Groups in Nigeria's ID System: Findings and Solutions from an In-Depth Qualitative Study (English).* Identification for Development, Washington, D.C.: World Bank. http://documents.worldbank.org/curated/en/881401618990982108/Barriers-to-the-Inclusion-of-Women-and-Marginalized-Groups-in-Nigeria-s-ID-System-Findings-and-Solutions-from-an-In-Depth-Qualitative-Study

19 World Bank. 2021. *Community Solutions for Improving Women's Access to ID in Nigeria.* Washington, D.C.: World Bank. https://blogs.worldbank.org/africacan/community-solutions-improving-womens-access-id-nigeria.

20 The World Bank's Governance and Anti-Corruption strategy defines Social Accountability as the extent and capability of people to hold the government accountable and make it responsive to their needs. See World Bank. 2012. *Strengthening Governance, Tackling Corruption: The World Bank's Updated Strategy and Implementation Plan.* Washington, D.C.: World Bank. https://documents.worldbank.org/en/publication/documents-reports/documentdetail/170861468331809051/strengthening-governance-tackling-corruption-the-world-bank-groups-updated-strategy-and-implementation-plan

21 World Bank. 2018. *Environmental and Social Framework for IPF Operations | Third party Monitoring.* Washington, D.C.: World Bank. https://documents1.worldbank.org/curated/en/578001530208566471/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Third-Party-Monitoring-English.pdf

such as name or address, inability to register in the ID system due to technical reasons or barriers to access; for example, due to the distance of the registration centers, mistreatment by registration agents, and identity theft, data leaks, or misuse of information for surveillance purposes, among other issues. A well-designed grievance redress mechanism should allow for constant feedback with the opportunity to adjust how the system operates in real time. CSOs, notably those centered around legal and paralegal activities, can play a critical role in contributing to the design and operation of a GRM for the consultation process, registration campaigns, and access to the ID and its use, to ensure that the redress mechanism is responsive to the needs of their constituents. When paralegal organizations are providing assistance, such organizations may also have access to information about the cases handled and be well placed to ensure the correct follow-up with ID authorities. Paralegal organizations can also help to identify issues that would be relevant for local data protection authorities to further investigate. It is important that GRMs are not implemented as a box-ticking exercise; instead, these mechanisms should provide a real opportunity for individuals to obtain an effective solution to their issue while also supporting the long-term improvement of the system in a continuous manner.

Conversely, limited resources may be dedicated to the management of grievances, or it can be difficult for vulnerable populations to access GRMs. It is therefore important to consider additional social accountability mechanisms as a part of the project. These mechanisms can support the evaluation of the performance of ID systems and offer insight into the remaining gaps for individuals to access and use the systems, so that these issues may be communicated to ID authorities for subsequent action.

Box 1.4: Reform of Pakistan's National Database and Registration Authority Grievance Mechanism and Introduction of a Strategic Reform Unit

Pakistan's National Database and Registration Authority (NADRA) has introduced a series of strategic reforms to address the remaining ID coverage gaps in the country, notably among women and nomadic communities.[22]

Based on an analysis of key issues, a new Public Engagement department was created to acknowledge the importance of consultation with the beneficiaries of ID systems. In addition, the department implemented quality and efficiency controls through the use of "mystery customers". In 2022, a new grievance mechanism, NADRA Centralized Complaint Management System (NCCMS),[23] was launched to better track, categorize, monitor, and respond to complaints. The mechanism was initiated in order to provide a working solution within a given timeframe to individuals facing difficulties and escalate the issue, if necessary, to reach a resolution in the short term.

An additional structure, called the Strategic Reform Unit, has been created to further analyze individual cases, as well as monitor key metrics of the systems in order to identify recurrent root causes of exclusion or inefficiency. The unit then recommends regulatory or system changes for the improvement of the ID system processes, as well as the functioning of these processes in the medium and longer term, in order to "close the feedback loop".

A specific Inclusion Registration Department (IRD) was also created to design more inclusive approaches to reduce the ID gap throughout Pakistan. The gap in women's registration, when compared to that of men, was reduced from 15 to 9.6 percent in recent months, notably by allowing women to change their name to the patronym of their choice after life events such as divorce. Additional reforms also enabled the registration of children by a single mother, and Sherpas assisted in mountainous regions to register remote populations.[24]

---

22 Malik, Tariq. 2022. *Future of NADRA: Reforms and Strategy.* Conference at the Islamabad Policy Research Institute. YouTube Video, 58:31, https://youtu.be/Tx-7yRZdQiQ?t=2158
23 For more information about NADRA, see: https://complaints.nadra.gov.pk/
24 Malik, Tariq. 2022. *Future of NADRA: Reforms and Strategy*. Conference at the Islamabad Policy Research Institute. YouTube Video, 58:31, https://youtu.be/Tx-7yRZdQiQ?t=2158

When to Engage with CSOs

There are many opportunities to engage with CSOs across the lifecycle of an ID project or system. One of the most critical elements for successful engagement is to institutionalize CSO engagement to ensure that beneficiaries are continuously engaged from the inception of the project, that a clear process for engagement is outlined and upheld, and that expectations are well-managed with regard to opportunities for input. This section outlines milestone moments in which CSOs should be consulted across the ID system lifecycle, as well as ID-relevant thematic topics to which CSOs can contribute expertise.

Engaging Across the Whole ID Project Lifecycle

The following figure (figure 2.1) presents examples of how engagement with CSOs can contribute to the improvement of the ID system throughout the project lifecycle. A feedback loop mechanism based on information, consultation, and action should be performed at each step of the cycle. This mechanism should be continuous throughout the implementation and operation of the Digital ID system to ensure that improvements are being made based on real-life testing and key lessons learned.

The first step of this cycle is to set the vision for the future project. This is one of the most critical steps, as it consists of defining the problem, assessing and establishing the needs of the community regarding identities, and understanding how to improve access to services. It is therefore critical that ID authorities not only take into account the outcomes of previous monitoring and evaluations performed in the country regarding existing ID systems, but also include CSOs at this preliminary stage to ensure that the necessary impact and risk assessments are complete, and that the future system is fit for purpose. Another particularly critical moment identified by CSOs is the moment at which ID authorities start making technology choices and decisions about how the system will be used by public and private service providers in the country.

Figure 2.1: Opportunities across the Stages of an ID System or Project
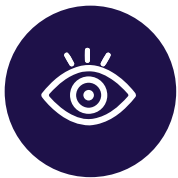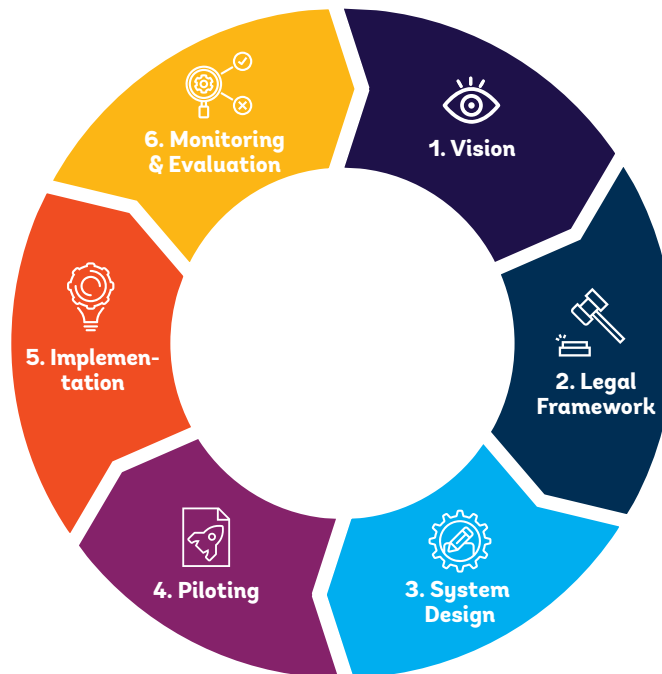
Setting the Vision

CSOs can provide input on the rationale, purpose and objectives of the proposed ID system and integrate key learnings from existing systems.

An ID authority can publish its vision, including development goals and foreseen use cases, to seek input from CSOs and all impacted stakeholders.

ID authorities can put a deliberative approach in place by implementing a taskforce consisting of CSOs, technology experts, academics, and other interests to review and further develop the initial vision for future ID projects.
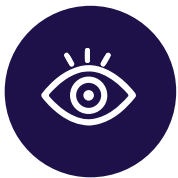
Setting the Vision

CSOs can not only provide qualitative input to impact and risk assessment studies, based on analysis of previous systems in place, but also oversee the outputs of such studies and ensure their methodology is sound and unbiased.

A CSO with expertise in gender inclusion could help design an impact assessment to explore the challenges women, men, transgender, and non-binary people may experience when interacting with the ID system.

Legal Framework

CSOs with subject matter expertise can be consulted on the policies, laws, and regulations, as well as application requirements linked to the updated or new ID system.

CSOs with experience in privacy, gender, disability, minority rights, language, and literacy barriers can be invited to public hearings by legislators and invited to submit amendments to the legal framework throughout its development.

System Design and Technical Specifications

CSOs can contribute to the design choice of the ID system by ensuring that processes and technologies are selected with inclusion and accessibility in mind.

CSOs can be invited to take part to a quality review quality in order to make sure that the systems developed are truly accessible to all.

System Design and Technical Specifications

CSOs can be consulted on the procurement strategy that will be used to select technologies and vendors.

CSO representatives could be invited to join a procurement committee or advisory group to foster transparency in the process.

Piloting

As the ID system is tested, CSOs can help conduct research by engaging specific groups at risk of exclusion to identify and reduce barriers, and also contribute to the realization of a Data Protection Impact Assessment (DPIA).

CSOs with expertise in gender, disability, minority rights, language, and literacy barriers, among others, could participate in the piloting of ID system registration.

Piloting

CSOs with IT skills could also perform audits or review the implemented system to find bugs. Such activity should be supported and not criminalized.

CSOs with IT skills could participate in a penetration test of the piloted IT system and note necessary "bug fixes" vulnerability reports to the ID authority for inclusion in the next system update.

Implementation

CSOs can inform ID authorities about specific difficulties faced by populations through an ongoing feedback mechanism and support the improvement of redress mechanisms.

ID authorities could ensure that CSOs are included in steering committees or advisory groups so that they can provide regular feedback on the effective experience of individuals using the system and proactively identify and address remaining barriers to access.

Monitoring and Evaluation

It is important to monitor and evaluate the impact and outcomes of the ID system to ensure that it is meeting its objectives and to flag any issues that arise throughout deployment.

CSOs can perform third party monitoring to assess the status and performance of the project and to make recommendations for improvement.

Engaging on Specific Areas of Expertise

CSOs can be engaged on specific areas of expertise that can improve ID system design and implementation. CSOs who have cultivated expertise and trust with vulnerable communities are well-placed to inform ID authorities on the particular needs, barriers, and opportunities to reach these communities throughout the ID lifecycle. It should be noted that the groups described below are not homogenous—not everyone will experience vulnerability and exclusion in the same way; for example, not all women will face the same advantages or disadvantages when interacting with an ID system, and people with disabilities will have unique capabilities and requirements. Additionally, intersecting identities, in which some people may be more disadvantaged by their multiple identities, should also be considered as part of the ID lifecycle, as this can further compound marginalization and exacerbate the risk of exclusion. For example, women with disabilities may face additional challenges as opposed to men with disabilities or women at large.[25]

The list below (table 2.2) provides non-exhaustive examples of the types of CSOs that can be involved in an ID system or project and the key topics on which they can contribute.

Table 2.2: Categories of CSOs and How They Can Support the Design and Implementation of an ID Project

Category of CSOs	Core Activities/Examples
CSOs Focusing on Gender-Specific Issues: • Women • Single Mothers • Unmarried, Divorced, or Widow • Migrant or Displaced	• Anticipate the impact of cultural, social, and religious norms in the community, and develop a specific strategy to facilitate the registration of women and use of the ID system. • Develop specific messages for women to understand the value of ID registration in accessing critical services. • Ensure that the issues linked to gendered life-events, such as sex assignment at birth, marriage, divorce, name changes, and property inheritance, are fully understood and taken into account when designing the ID system.
CSOs Focusing on **Vulnerable Groups:** • Youth and Elderly • Illiterate Persons • People Living in Poverty (including in urban areas) • Rural Communities • Persons with Disabilities • LGBTI People • Minority Ethnic, Religious, or Linguistic Groups • Internally Displaced Persons • Refugees • Stateless Persons • Migrant Populations • Homeless Persons	• Ensure that the voice and needs of vulnerable and marginalized groups are taken into account in the design and implementation of the ID project. These groups are by nature less able to participate in public decision-making or may fear to express themselves directly, such sexual and gender minorities. • Help ID authorities to identify rural population groups and use their local network and presence to facilitate registration in the new system. • Provide input regarding potential barriers to registration and use of ID systems and associated services. For example, CSOs can advise on accessibility needs for people with disabilities to access registration centers, as well as alternative pathways for providing biometric attributes that may not be possible for certain people. • Adapt ID authority communication and dissemination approaches to the needs of vulnerable and marginalized groups. This can include advice on developing materials or accommodations for minority language speakers, people with disabilities, or low literacy groups, and adapting key messages on the benefits and characteristics of the ID systems for specific groups of the population. • Report any type of discrimination faced by specific populations at the time of registration in the ID system.

---

25 Lord, Janet Elaine. 2020. *Creating Disability Inclusive ID Systems (English)*. Identification for Development, P.25 Washington.: World Bank Group. http://documents.worldbank.org/curated/en/967741605683569399/Creating-Disability-Inclusive-ID-Systems.

CSOs that Work on or Provide Aid for: • **Birth Registration** • **Legal Identity** • **Access to Basic** Services and Entitlements, such as financial inclusion, government programs and benefits, health, or the right to food	• Monitor unintended consequences, such as denial of access to basic services, so that these can be addressed at the earliest opportunity. • Support consideration of appropriate technology choices for digital authentication and provide feedback on how the system is used by public and private service providers in specific contexts, such as low connectivity or low smartphone penetration.
CSOs Defending **Political and Socioeconomical Human Rights** at the International and Local Level	• Advocate for the adoption of a comprehensive legal framework to support an enabling environment for the ID system. • Identify potential plans or practices that could compromise fundamental rights and access to basic services. • Identify laws and regulations that may need to be reformed to reduce barriers faced by the population as a whole or particular groups; for example, laws that require a marriage certificate for women to obtain a birth registration or requiring the name of a husband to be featured on a woman's ID card. • Hold ID authorities and governments accountable to protect the rights of the population impacted by the ID system.
CSOs Focusing on **Digital Human Rights**, Including: • **Data Protection** • **Privacy** • **Digital Rights**	• Can ensure that the proposed system features are in line with international norms and best practices and raise awareness about privacy-enhancing technologies (PETs) and security measures. • Review the legislation and system design to ensure that the data collected is minimal and justified, as well as provide expertise on how to introduce privacy-enhancing approaches and necessary safeguards. • Help increase public awareness of data protection issues and the appropriate use of the ID and identity data, such as what is expected from a relying party using the Digital ID in terms of data use, retention, and anonymization. • Advise ID authorities on the best way to explain to individuals how their data will be captured and how to effectively collect informed consent. For example, some demographics, such as elderly persons, might need larger printed text or recorded materials, while others may require oral explanations or materials in other languages. • Can ensure that data protection impact assessments (DPIA) are properly conducted and published whenever a digital identity system is implemented. • Help report any illegal or concerning use of the ID system by relying parties, such as retention of information beyond the authorized and necessary time frame, as well as ensure that redress mechanisms are effective.

It is important to avoid siloed consultations and to organize engagement activities in such a way that CSOs with different focus areas can work across sectors, so that they have a chance to benefit from each other's perspectives and understand how an ID system might change the way they work and interact as well. This is particularly important for the review of system features and matters linked to data protection and cybersecurity, which often mobilize digital rights groups, but would also benefit from the perspective of organizations that usually focus on specific demographic segments, such as woman's rights and marginalized groups, to avoid bias within the system. For example, Afghan women managed to get their name included in their children's ID cards to enable them to act on behalf of their children in education

and health domains.[26] For further ID4D resources and tools on understanding the needs and barriers of vulnerable groups, as well as best practices to protect individual data and rights, visit:

- Creating Disability Inclusive ID Systems
- SOGI-Inclusive ID Systems
- Achieving Universal Access to ID: Gender-based Legal Barriers Against Women and Good Practice Reforms
- Barriers to the Inclusion of Women and Marginalized Groups in Nigeria's ID System: Findings and Solutions from an In-Depth Qualitative Study
- Privacy by Design: Current Practices in Estonia, India, and Austria

The following table (table 2.3) provides further insights on the specific challenges faced by some of the key categories of vulnerable and marginalized population groups as a part of ID systems and projects.

Table 2.3: Challenges faced by key categories of vulnerable and marginalized population groups

Group	Challenges
Persons with Disabilities	Persons with disabilities are more likely to encounter greater barriers to accessing ID services and participating in processes related to ID system development, such as lack of physical access to registration centers and exclusionary laws/technology choices.
Ethnic, Religious, or Other Minority Groups	Depending on the country context, there may be multiple groups, based on religion, language, race, or ethnicity, who may be vulnerable to marginalization in or as a result of the ID system and whose voices are not necessarily taken into account in the design and implementation of ID projects.
Women	The gender gap in ID access for women is particularly acute in lower-middle-income countries (LMICs), where an estimated 45% of women do not have an ID when compared to 30% of men.[a] Women may face specific barriers, for example, gender-based differences in laws and regulations, such as those requiring permission from a male family member, that make it more onerous for women to apply.[b] This risk of exclusion is further amplified by other factors related to gender inequality, including limited education and access to information, the cost of childcare if travel is required to obtain identification, limited income and household decision-making power, and a lack of digital literacy.[c]
Remote, Rural, and Nomadic Populations	A person living in a rural area in a low-income country (LIC) is about 10 percentage points less likely to have an ID than a person living in an urban area, all else equal.[d] This situation is due to a multiplicity of factors: difficulties for the population to access a registration center, low awareness of the benefits that can be obtained, and limited connectivity and other infrastructures like roads, making it difficult to implement digital ID systems that require connectivity at registration; for example, to facilitate authentication, data transfers, or duplicate biometric registration checks. In many cases, the rural population will also have lower literacy levels that may hamper their ability to read and use digital technology. Nomadic groups experience similar challenges; these groups often have reduced contact with the government and may not have fixed addresses, adding to the challenges they face.

---

26 The Engine Room. 2022. *Digital IDs Rooted in Justice: Lived Experiences and Civil Society Advocacy Towards Better Systems*. https://www.theengineroom.org/community-call-digital-ids-rooted-in-justice/

| Migrants, Forcibly Displaced Populations, and Persons at Risk of Statelessness	Migrants, refugees, asylum seekers, and internally displaced persons can face multiple challenges related to ID, including lost, stolen, or confiscated identity documents from their home countries that are difficult or impossible to replace. As with persons from marginalized groups who have been unable to obtain legal ID, children who are forcibly displaced may face an increased risk of statelessness if their parents lack documentation, and they are unable to obtain legal identification documents in their new homes. What documents migrants or displaced persons do have may not be accepted in host countries or regions, compounding their exclusion from basic services and reducing their ability to integrate.[e]
Sexual Orientation and Gender Identity (SOGI)	Even in cases where legislation related to ID systems is gender-neutral, gender identity minorities, such as transgender or non-binary people, may encounter discrimination or other barriers in the process of obtaining and using their ID. For example, individuals may face difficulties applying for an ID or providing their ID for access to services when the gender recorded on the ID does not match their gender identity or appearance.

a   Metz, A. and Clark, J. 2019. *Global ID Coverage, Barriers, and Use by the Numbers: Insights from the ID4D-Findex Survey (English).* Identification for Development. Washington, D.C. World Bank Group. http://documents.worldbank.org/curated/en/953621531854471275/Global-ID-Coverage-Barriers-and-Use-by-the-Numbers-Insights-from-the-ID4D-Findex-Survey

b   World Bank. 2019. *Addressing the Gender Gap in ID Access: Research Summary*. Identification for Development. Washington, D.C.: World Bank Group. https://id4d.worldbank.org/sites/id4d/files/ID4D-Gender-and-Legal-Barriers-Summary-EN.pdf

c   World Bank. 2019. *Addressing the Gender Gap in ID Access: Research Summary.* Identification for Development. Washington, D.C.: World Bank Group. https://id4d.worldbank.org/sites/id4d/files/ID4D-Gender-and-Legal-Barriers-Summary-EN.pdf

d   Metz, A. and Clark, J. 2019. *ID Coverage, Barriers, and Use by the Numbers: Evidence from the 2017 ID4D-Findex survey (2019)*

e   Manby, Bronwen. 2016. *Identification in the Context of Forced Displacement: Identification for Development*. Washington, D.C.: World Bank Group. http://documents.worldbank.org/curated/en/375811469772770030/Identification-in-the-Context-of-Forced-Displacement-Identification-for-Development-ID4D

Box 2.1: Understanding People's Perspectives on Identification: A Qualitative Research Toolkit[27]
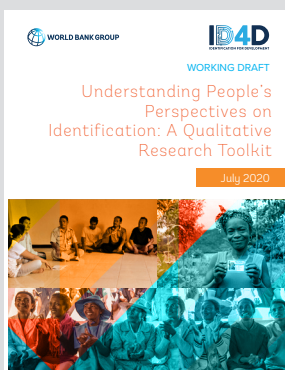
This toolkit developed by ID4D is intended to serve as a guide for researchers and program implementers seeking to undertake qualitative research on ID systems. It pulls from and summarizes a rich pool of qualitative research methodologies used for a range of social science research and analyses that can be applied to research people's experiences with identification and ID systems. The toolkit describes guidance, tips, and suggestions on developing a research methodology and implementing data collection aligned with good practices, as well as research and ethical standards. Developing a deeper understanding of people's experiences will help develop ID systems that increase access to services while enhancing transparency, personal control, and oversight.

27 World Bank. 2020. *Understanding People's Perspectives on Identification: A Qualitative Research Toolkit.* Identification for Development. Washington, D.C.: World Bank Group. https://id4d.worldbank.org/sites/id4d/files/WB-ID4D-Understanding-Peoples-Perspective-on-Identification-A-Qualitative-Research-Toolkit.pdf

How to Engage with CSOs: Considerations and Tools

This section provides practical guidance on how to engage with CSOs, including through consultations and participation in design and implementation, as part of developing an ID project or system. It suggests steps that can be followed by ID authorities as they move through ID system planning, design, and implementation and presents tools and resources that can support this journey. In all circumstances, it is important to consider how engagement with CSOs can be institutionalized and incorporated across all elements of the ID system design and deployment.

General Considerations:

- Depending on **the country context,** the CSO ecosystem will have different levels of maturity, subject matter expertise, and capacity. Geographical and cultural considerations will also influence how and where CSOs are best able to contribute. Undertaking a stakeholder mapping exercise can help identify CSOs to engage with and provide multiple opportunities for CSO participation throughout an ID project in various channels.

- **Consider CSO limitations** that may impact participation, such as funding, access to technology, ability or budget to travel to consultations, and time constraints. In addition, the ability to contribute to public debate freely and without risk of retaliation for the organization or members should be taken into account. This is especially important in countries with nascent civil society ecosystems, for CSOs working on sensitive topics, and for ID projects governed in such a way that they require coordination and engagement with multiple government authorities. Where possible, a budget could be allocated for CSOs with limited resources (such as subsidizing travel costs or IT requirements) to enable and encourage greater CSO participation. CSOs may also lack familiarity with ID-related technology and concepts, which could hinder their participation if steps are not taken to provide them with sufficient information on the sector. In addition, establishing strong relationship with local communities is a long-term effort for CSOs, which is based on mutual trust and respect. ID authorities that wish to collaborate with CSOs on a project need to keep in mind that this type of partnership could jeopardize years of relationship-building if the CSO is perceived by local communities as playing against their interests and pushing the government's agenda.

- **Human and financial resource requirements** to support the engagement process should be identified and budgeted for as part of the project by the ID authority to ensure that there is adequate support throughout the different stages of the engagement strategy.

- **Accessibility** should be evaluated to ensure that diverse organizations and communities are able to participate in consultations and other engagement activities, including addressing barriers to inclusion for persons with disabilities, limited ability to travel within the country—for example, to an event in the capital city, specific language requirements (including avoiding overly technical or "jargon"-based terminology), cultural sensitivities, and varied access to technology, in addition to considering other resources that may be used throughout the consultation process.

Box 3.1: Impact of the COVID-19 Pandemic on CSOs

The COVID-19 pandemic resulted in countless economic and societal impacts throughout the globe. CSOs have often played the role of first responders, especially for vulnerable populations. During the consultation workshops organized as part of the preparation of this guidance note, CSOs mentioned that their actions have been hampered by strict lockdowns and emergency laws introduced to manage the health crisis. The pandemic worsened many already-precarious situations, and economic ecosystems remain unstable. It is expected that the crisis will have long-term effects on the ability of CSOs to contribute to public engagement, as their action is still very much focused on alleviating the adverse effects of the pandemic.

Step 1: Preparing for Engagement

The planning phase of a new ID project or series of reforms presents the opportunity to develop an engagement strategy that clearly maps out when and how CSOs can be engaged throughout the lifecycle of the ID system and provide clarity to all stakeholders on what engagement can be expected and when. The goal of designing an engagement strategy is to enhance the efficiency and effectiveness of CSO engagement, and ensure that all relevant evidence required for decision making is collected throughout the consultation process and participation opportunities.[28] The engagement strategy can complement other preparatory activities, such as the ID4D Diagnostic[29], and for World Bank-financed projects, it can be part of the activities undertaken as part of the World Bank Environmental and Social Framework.[30]

There are multiple steps that can support this process:

Committing to Effective and Meaningful Engagement

For an ID system to be inclusive and trusted, it is critical that decision makers and implementers commit to effective and meaningful engagement with the civil society and the population at large, based on mutual respect. The engagement should follow key principles, including:

- **Transparency and honesty:** Secrecy or "double-speak" will be counterproductive. Information should be available and easily accessible before and during the project, including draft legislations, policy documents, impact and risk assessments (including DPIA), feedback received, system architecture, open source code, tenders, and businesses involved. CSOs should also be empowered to monitor adherence to key principles and hold ID authorities accountable. In addition, it is critical that the engagement process is given enough publicity to collect the contributions of relevant stakeholders.

- **Genuine—not "token"—consultations:** Too often, "consultations" are held once at an inaccessible location or with little advertisement, or after all decisions have been made. Engagement must be meaningful to effectively contribute to the project. The consultation activities, such as questionnaires, must remain neutral and unbiased toward government opinions. Contributions

28 European Commission. *Better Regulation Toolkit, Tool #53: The Consultation Strategy*, available at: https://ec.europa.eu/info/sites/default/files/file_import/better-regulation-toolbox-53_en_0.pdf. P.2

29 World Bank. 2018. Guidelines for ID4D Diagnostics. Identification for Development. Washington, DC: World Bank Group. https://documents1.worldbank.org/curated/en/370121518449921710/Guidelines-for-ID4D-Diagnostics.pdf

30 World Bank-financed projects are required to perform an Environmental and Social System Assessment (ESSA) and prepare a Stakeholder Engagement Plan (SEP), as explained on the World Bank website: https://www.worldbank.org/en/projects-operations/environmental-and-social-framework

from CSOs should truly impact the future outcomes of the project. This includes planning for mechanisms to resolve disputes during the engagement process and responding to dissenting opinions and contributions.

- **Proactive and continuous engagement:** Engagement should not be leveraged as a reaction or limited to a specific phase. Engagement and consultations should be conducted at all stages of the project cycle, from the early stages of design throughout implementation.

- **Well-resourced:** ID authorities should commit adequate staff and time to the engagement activities, as well as institutionalize such practices to their day-to-day functioning. In this context, ID authorities should adequately budget the resources and funding to support the engagement activities throughout the project. Depending on local context, this could include financial support for CSOs to effectively contribute to the engagement activities.

- **Prepared and evidence-based:** ID authorities should ensure that the ID project is based on a thorough assessment and analysis of existing resources available that can shed light on the current functioning of the identification system, key limits, and points for improvement, notably the work already produced by the civil society and research community, which is most likely public; for example, past reports, research publications, media publications, and donor reports.

- **Coordinated:** ID authorities should ensure that all government entities involved in the ID project are fully aligned on its purpose and goals to avoid confusion and duplication of policy and law-making processes.

- **Institutionalized:** Engagement should be embedded in the process rather than only ad-hoc. Specific milestones and feedback opportunities should be factored into the planning and the overall project timeline. Beyond the engagement activities organized as part of the design and implementation of an ID project, public authorities should consider the adoption of a systematic, multi-stakeholder approach as part of their governance structure and policy-making to facilitate engagement in subsequent projects.

Creating an **official liaison role** can be an important step to adhere to the above principles by developing engagement strategies, ensuring proper and routine coordination of activities, and liaising with different project teams and organizations to build trust, continuity, and communication (see Appendices for an example table of reference (TOR) for a CSO liaison position).

Stakeholder Mapping

Conducting a stakeholder mapping exercise will help identify local and national CSOs that have an interest or expertise in topics related to ID systems.[31] A stakeholder map can support decisions on how to structure outreach to CSOs, when and how to engage specific CSOs on relevant themes, and identify potential gaps in participation. The purpose of the stakeholder mapping is not to limit participation to the consultation process, which should be as open as possible, but rather to ensure that a wide array of organizations representing key populations and with relevant expertise is proactively targeted to take part in the engagement.

The key elements of a stakeholder mapping consist of:

1. Identifying affected individuals, groups, local communities, and other stakeholders of the project. In the case of ID projects, the whole population is expected to be impacted. It is particularly

---

31 For more information about how to conduct stakeholder mapping as part of a World Bank lending project, see the Guidance note ESS10: Stakeholder Engagement and Information Disclosure. https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf

important to identify target groups for whom the ID system will have important consequences, such as underserved or vulnerable populations, and identify CSOs who work with these communities. Public and private services that will use the new system to identify individuals will also be directly impacted by the project

2. Seeking other parties that may be interested in the project. These may be local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities. Refer to table 2.2 for an overview of key categories of CSOs to be identified and their potential topics of interest.

3. Drawing from stakeholder lists gathered during previous engagement on other policy topics, through local networks of CSOs, and from ID ecosystem players and development partners with knowledge of the national and local CSO community.

Building a Plan for Engagement

A plan for engagement outlines the scope of the engagement, the steps it will follow, and when different stakeholders should be included.[32] It should clearly define:

- The project description and its governance
- The identification of stakeholders and analysis
- The purpose and timing of the stakeholder engagement program, covering all steps of the ID project lifecycle
- The tools that will be used for consultation
- The resources that will be dedicated to organize the engagement activities and their responsibilities
- The grievance mechanisms that will be introduced for the project
- The monitoring activities that will be performed, as well as reporting to the stakeholders

A primary request from the CSO community is to be consulted "early and often" to ensure that there is a meaningful opportunity to provide input to the ID system from inception to delivery. This plan should therefore be made public and ideally developed along with CSOs to adjust expectations and ensure that it is grounded in reality.

The planned consultation and participatory activities should not be planned as "box ticking" exercises. On the contrary, planning should try to identify topics and issues for which a deeper dialogue can be planned with CSOs, depending on the local ecosystem. This enables ID authorities to plan activities that could include a higher level of engagement with CSOs on topics for which they have more political flexibility. It will be important to identify the topics that are out of scope for the ID system's consultations and engagement activities and provide the rationale. For example, if there are sensitive or confidential issues related to security, technology, commercial procurement, or agreements, it is important to note these and provide transparency on the reasons for their exclusion during engagement with CSOs.

---

32 For more information about how to establish a stakeholder engagement plan as part of a World Bank lending project, see the Guidance note ESS10: Stakeholder Engagement and Information Disclosure. https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf

Determining the frequency and methods of communication that will support the engagement process is an important step in building transparency and accountability. This step will also help to manage expectations, as all stakeholders will benefit from clarity regarding when and how information will be shared, and how opportunities for input and feedback will be managed and communicated. It is important to consider language requirements, the need to organize events in remote locations, the format in which the information will be shared, and the communication channels used. For example, outputs from CSO engagement can be shared as summary reports or posted meeting minutes.

Timelines will vary across country contexts depending on the scale and complexity of the ID project. In the context of CSO engagement, it is important that reasonable time frames for notification about upcoming opportunities and effective participation are provided and upheld, and that key dates, deadlines, and any changes to the plan are communicated in advance. As a general rule, response timeframes should be considered in weeks or months rather than days.

Figure 3.1: Example of Activities to Include in a Plan for Engagement
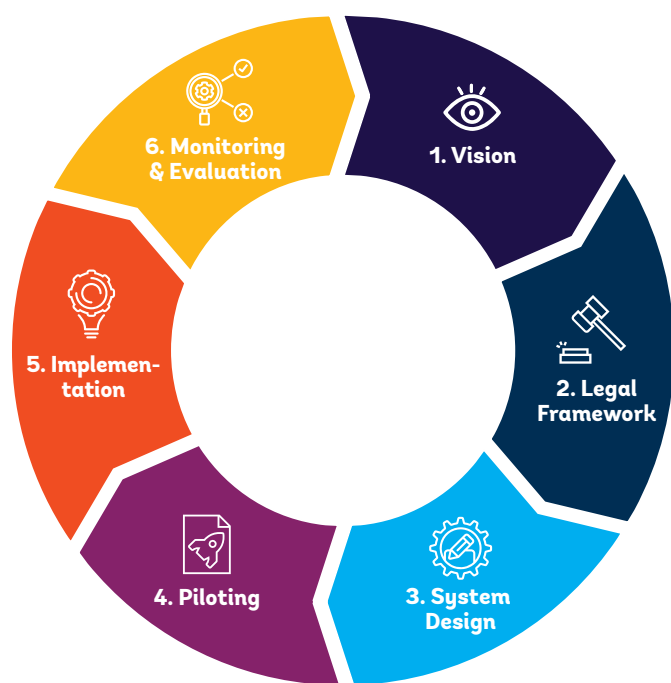
- Organize a **deliberative, multi-stakeholder taskforce** to review and further develop the government vision paper
- Seek **public participation** to the legislative process by organizing public hearings and written consultations
- Organize **CSO consultation meetings** to present system design ideas and procurement strategies
- Organize **collaborative, qualitative research** to inform design, pilot and the rollout strategies
- Establish a **committee of civil society representatives** to provide feedback during implementation and support redress mechanism
- Partner with CSOs for organizing **focus group discussions** in order to inform evaluation studies

Source: World Bank

Step 2: Engaging with CSOs – Summary of Methodologies

There are multiple ways to engage CSOs that are either consultative and/or collaborative. The most appropriate method will depend on a number of factors, including the topic to be discussed, the depth and objectives of the session, timelines, and the participant profile and level of collaboration required (table 3.1).

Approaches for Engagement

Table 3.1: Potential Methods of CSO Engagement[33]

Methods	Benefits	Key Considerations
Written/Online Submissions	Given the importance of providing multiple channels for engagement, CSO consultation processes should always include the opportunity for providing written input on different elements of the system throughout the ID system design and implementation process (such as the legal framework) both by mail and online. The topics and questions for which input is being sought should be clear and easily accessible in both analog and digital formats, with reasonable and realistic time frames and information on how the input will be reviewed and incorporated into the process.	It is critical that the documentation of the consultation is provided sufficiently in advance and that an adequate timeline is defined in order to enable harder-to-reach organizations and populations to contribute to the consultation. The tools used for the online consultations should take into account the local context and accessibility, such as a mobile friendly website.
Regular CSO Consultation Meetings	ID authorities should regularly consult with CSOs on emerging trends and challenges that are raised by civil society or through grievance redress mechanisms (GRMs). Regular consultation workshops or meetings with CSOs representing different target groups or in different regions can provide an opportunity to hear from beneficiaries about the challenges arising from the ID system. These consultations should be outlined in the CSO Engagement Plan developed at the inception of the ID system project. A regular schedule of consultations gives the ID authority the opportunity to close the feedback loop between ID system beneficiaries and ID authorities by reporting back on actions taken to address previous concerns and grievances and to seek additional civil society and community feedback.	Consultation meetings are a positive way to create a channel of communication for CSOs. Some countries have institutionalized the organization of civil society hearings during the legislative process. It is always advisable to also provide CSOs with the ability to contribute via written consultation opportunities in order to gather more detailed and anonymized feedback.
Public Participation and Crowd-Sourcing	ID providers can also raise awareness of the project and foster public ownership by having people participate in elements of the system design, such as crowd-sourcing contests to design ID system logos, songs, names, or card designs. However, to build trust and buy-in, such activities must be performed as early as possible in the project to be seen as authentic, as opposed to a "box-ticking" exercise when all decisions have already been made.	Authenticity of the ID authority is key: engaging in public participation yet then ignoring the provided input can be detrimental to the trust that the population will have in the project.

---

33 Content adapted from: European Commission. *Better Regulation Toolbox, Tool #53: The Consultation Strategy* available at: https://ec.europa.eu/info/sites/default/files/file_import/better-regulation-toolbox-53_en_0.pdf; World Bank ID4D Practitioners Guide-Table 19: Public Consultation available at : https://id4d.worldbank.org/guide/public-consultation; also includes input from a variety of CSOs.

Establishing a Standing Civil Society Committee	ID authorities can benefit from including CSO representatives in the project steering committee or establishing an advisory committee comprised of civil society representatives that can provide feedback on the design of the ID system, as well as on implementation of the system throughout the identity lifecycle (from planning to implementation). Members of the committee can utilize social accountability mechanisms, such as third-party monitoring and beneficiary scorecards, to monitor and report on critical issues related to all parts of the identity lifecycle, from raising awareness and communications to registration and authentication. Civil society can also be critical to raising issues from marginalized communities who do not engage with the ID system and whose feedback would not otherwise be captured.	Clear roles and responsibilities must be defined for the committee so that the outcomes of the meetings are not only viewed as a routine formality. ID authorities could decide to provide larger decision-making powers to the committee on topics on which it has more political flexibility.
Collaborative Research	Research and data gathering activities can include different data collection methods: • Surveys to gather quantitative data • Focus groups to identify more qualitative input • Interviews to address specific issues with specialists • Interactive exercises to brainstorm on specific aspects of the ID project • Synthesizing recommendations based on collected data When conducted early in the lifecycle of a project, community-based research can help gather individual perceptions, understanding, struggles, and needs regarding identification. This information can provide critical input to help shape the design and implementation of the system, including registration strategies, credential formats, authentication mechanisms, use cases for the ID, and communication efforts. In particular, research that focuses on or includes marginalized groups is essential for mitigating the risk of exclusion and building trusted ID systems. CSOs are particularly well placed to support such research, as they are often already involved in supporting the registration of vulnerable populations. ID4D collaborated with more than 40 CSOs working on SOGI issues across Africa[a] and consulted with CSOs at the annual Conference of States Parties (COSP) to the Convention on the Rights of Persons with Disabilities (CRPD) to issue guidance notes on inclusive design.[b] Focus groups can be implemented at a relatively low cost and provide useful input to the broad perceptions and experiences of impacted population. They can foster more discussions than individual interview. Ongoing research and data collection throughout the project—or when rolling out new features—can similarly draw attention to issues with implementation or help inform later reforms.	To be meaningful and valid, research should follow established protocols and methodology, including adherence to ethical standards. The selection of the participants is particularly critical: it should include the individuals most concerned by the research, such as vulnerable populations, as opposed to those who are easier to reach, such as inhabitants of large cities. Some methodologies, such as focus groups, are not appropriate for overly personal or sensitive topics, for example, discussing discrimination in public. The nature of this exercise may also result in groupthink: agreeing as a group despite differences in opinions.

Citizen Engagement and Social Accountability, Participatory Monitoring and Evaluation (M&E)	ID authorities can invite CSOs and other stakeholders to take part in observation missions in order to evaluate the efficiency of the new systems, the satisfaction of beneficiaries, the accountability and redress mechanism, and the accessibility of the ID and associated services. In Nigeria, this approach has been implemented as part of the Social Accountability in the Judicial Sector (SAJS) project to enhance transparency and access to information in the judicial sector, in order to address outdated elements in the court system and to allow for effective reforms.	Adequate training and resources need to be allocated to the selected group in order to foster the quality of the deliberation. ID authorities also must grant access to necessary information, such as system data. To the extent possible, GRMs should be included in the corresponding ID legislation and regulations.

a   World Bank. 2021. I*D Systems and SOGI Inclusive Design*. https://documents.worldbank.org/en/publication/documents-reports/documentdetail/803981634587620467/id-systems-and-sogi-inclusive-design. Washington, D.C.: World Bank Group.

b   World Bank. 2022. *Creating Disability Inclusive ID Systems*. https://documents.worldbank.org/en/publication/documents-reports/documentdetail/967741605683569399/creating-disability-inclusive-id-system. Washington, D.C: World Bank Group.

Communication Channels

To maximize opportunities for participation, innovative approaches to structuring engagement opportunities should be adopted, such as leveraging web-based platforms and social media to support consultations and active participation.

ID authorities may first consider the most efficient ways to reach out to CSOs and impacted communities based on local context. However, CSOs often have limited time and resources to engage. It is therefore important that ID authorities plan for direct and targeted engagement and do not rely on the ability of CSOs to monitor all channels of government communication or general announcements.

In terms of participation in engagement activities, new technologies offer an efficient way to reach specific groups. For example, focus group participants could be recruited on social media. The possibility to organize online consultation sessions can further enable the participation of inhabitants beyond the capital city and reach people from remote areas who might not normally be able to travel to a central location. However, alternative pathways for participation should also be offered to facilitate the participation of people with limited access to connectivity or digital tools and lower literacy. One channel of communication might address the preference of one group yet omit others, especially the most vulnerable populations that are already at risk of being excluded from the new system.

To facilitate the interaction between CSOs and the ID authority throughout the ID project lifecycle, it is recommended that a single point of contact should be provided for all engagement activities (cf. Appendix A, Sample terms of reference for a CSO Engagement Liaison officer). This will ensure that activities are well coordinated, coherent, and easier to attend for CSOs. This point of contact should be accessible via different channels of communication to accommodate the preferences of CSOs based on local context.

Step 3: Following the engagement activities

Record and Reflect CSO Input in ID System Outputs

Documenting and reporting the input, output, and outcomes of CSO engagement will help strengthen the transparency, accountability, and legitimacy of the ID system. It will also demonstrate to CSOs and the communities they represent that their voices have been heard and included in the process. It is recommended that ID authorities publish within a reasonable timeline the full scope of contribution from both civil society and private interests, along with their response and justifications regarding whether or not specific submitted ideas or input are included or excluded in the final legislation, policy document, or technical specifications. The Communications Authority of Kenya has adopted this approach and publishes all input received from ongoing consultations organized in the country about legislation and policies, explaining their final decision choices and including contradictory views of stakeholders.[34]

Any publication of the outcomes of the discussions must be done with the agreement of the contributors. It is recommended to clarify at the beginning of each engagement how the information will be reused and publicized, such as agreement on when to use "Chatham House" rules.[35]

While it is not realistic to expect that all input and recommendations received will be included and considered for the project, it is important that they be given due consideration. There must also be a record of where CSO input has influenced the output and outcomes of the consultation and engagement process, in addition to the design and implementation of the ID system overall.

Box 3.2: Malaysia | Publication of the Results of Consultation[36]

The Malaysian Communications and Multimedia Commission (MCMC) was tasked to lead the development of the National Digital Identity (NDID) framework. As part of the design of the future framework, a consultation program took place, resulting in the participation of 67 ministries and government agencies, 156 private organizations, and 35,160 individuals. Participants raised key concerns linked to data privacy and protection, security, and reliability, as well as risks of misuse of the future framework. They also welcomed the future use of digital authentication functions, notably to access online health records and government e-services. In general, the consultation reflected the positive interest of the group of stakeholders consulted but also the need for the ID agency to address important safeguards to build trust in the new system. The consultation period also provided an opportunity for the MCMC to communicate the key features of the future framework.

Document Impacts and Lessons Learned

It is helpful to capture lessons learned from CSO consultations and engagement to identify any gaps, challenges, or opportunities that can be built on in future engagement. This will demonstrate the commitment of the decision makers to establishing meaningful engagement by continuously improving

---

34 For more information about the published consultation results, see the Communications Authority of Kenya website at https://www.ca.go.ke/?taxonomy=published-findings&s=&document_category=published-findings

35 Under the Chatham House Rule, anyone who comes to a meeting is free to use information from the discussion, but is not allowed to reveal who made any particular comment. It is designed to increase openness of discussion. https://www.chathamhouse.org/about-us/chatham-house-rule

36 Malaysian Communications and Multimedia Commission (MCMC). 2020. *National Digital Identity (ID) Framework for Malaysia. Public Consultation Report.* August 2020. https://www.mcmc.gov.my/skmmgovmy/media/General/pdf/Public-Consultation-Report_National_DI.pdf

the way feedback and grievances are collected. The Kenya ICT Action Network (KICTANet) Think Tank contributed to this effort by providing an assessment of the public participation activities organized around the adoption of a series of key ICT-related legislation and policies.[37]

Capturing the results of the consultation and engagement process and the impact of CSO engagement on shaping the ID system is also an important part of the ongoing evaluation of the ID system implementation process. Contributions to changes in outcomes of the ID system from CSO engagement, such as improved awareness of ID system services in particular communities, increased registration and adoption in key marginalized or vulnerable groups, or strengthened data privacy legislation, should be captured through the monitoring and evaluation (M&E) process for the ID project and communicated back to CSOs.

To facilitate this approach based on continuous monitoring and evaluation, it is advised that from the initiation of the project, ID authorities plan a series of milestones for periodic revision of the system every fixed number of months or years; this could include the production of a report in conjunction with proposals for improvements. CSOs could also be included in the drafting of such evaluation report.

37 Githaiga G., Waigumo Mwanzia S., Kapiyo V. 2021. *Public Participation: An Assessment of Recent ICT Policy Making Processes in Kenya*. KICTANet. July 2021. https://www.kictanet.or.ke/?mdocs-file=43918

Appendix A: Sample Terms of Reference for CSO Engagement Liaison Officer

The following is an example of TOR; it will need to be modified to the specific country context and requirements. Note that for World Bank lending projects, some of the activities and deliverables would typically be completed during project preparation as part of the Environmental and Social Framework (ESF).

Draft Terms of Reference

Civil Society Organization (CSO) Engagement Liaison Officer

<Identification System Project>

Objective: The objective of the CSO Liaison Officer is to support and strengthen engagement with CSOs throughout the duration of the ID system project, from inception through to deployment, to ensure that there is meaningful consultation and engagement opportunities for CSOs to shape and provide input on ID system policies, procedures, and design.

Scope: The successful candidate in this role will be responsible for building and executing a CSO Engagement Strategy and acting as a bridge between relevant government stakeholders and the civil society community as the ID system is considered, designed, and implemented. The Liaison Officer will work with CSOs to ensure awareness of, and participation in, the ID system project as well as work with ID authorities and other government counterparts to ensure that best practice standards in communication, transparency, and inclusive participation are upheld throughout the engagement process.

Key Activities and Deliverables: The successful candidate will be responsible for delivering the following:

- Undertake a **stakeholder mapping** exercise to identify initial CSOs who (1) have an interest in ID system projects (such as those focused on data protection and privacy, or promoting the rights of marginalized groups and (2) those who have subject matter expertise that could inform the design and implementation of the project as part of the consultation and engagement process

- Develop an **engagement plan** for ensuring meaningful and inclusive participation of CSOs throughout the ID project lifecycle. This should define when and how CSOs will be consulted and be reflective of the importance of engaging CSOs early in the process, as well as maintaining consistent and clear communication throughout the project.

- Undertake an **inclusion assessment** to ensure that planned CSO engagement and consultation activities are accessible to all participants and that any risks of exclusion or discrimination in the consultation process are mitigated

- Support the consultation and engagement process by acting as a **facilitator and moderator** for organized workshops, forums, roundtables, legislative reviews, etc. as outlined in the CSO Engagement Plan.

- **Create a record of the activities organized and the decisions made**, including justifications, based on the input received via consultations and other engagement activities.
- **Publish information**, such as draft legislations, policy documents, impact and risk assessments (including DPIA), feedback received, system architecture, open-source code, procurement strategies, tenders, and business involved, as well as key performance metrics of the system when available; for example, the number of registration and authentication failures.
- Act as a **communication conduit** between the ID authority and CSOs, ensuring that both CSO and government stakeholders are kept informed of the process, progress, and outcomes from the ID system consultations and engagement activities.
- **Support the ID authority** and other relevant government stakeholders in identifying government representatives who are best positioned to engage in different stages of the CSO consultations based on subject matter knowledge, experience, and decision-making responsibilities.
- **Build awareness** between the CSO community and government stakeholders on the capacity, objectives, constraints and approaches of each to help increase mutual understanding and trust.
- **Collaborate with communications** colleagues to create a strategy that ensures that information and data related to the ID system, which is relevant to CSOs, is communicated in a timely, clear, and accessible manner across multiple platforms, and that the outcomes of the consultation and engagement process are well documented and shared.
- **Capture any lessons learned** from the CSO consultation and engagement process and make recommendations for enhancing and sustaining engagement with CSOs to support the ID system

Timeline:

- This role is anticipated to begin prior to the launch of the ID system project to ensure that the CSO liaison can develop an engagement plan to accompany the broader ID system project lifecycle and begin engaging with CSOs from the vision and objective setting phase of the ID system.
- It is expected that this role will conclude following the deployment phase of the ID system, after an evaluation of impact, outcomes, and lessons learned is undertaken.

Experience and Qualifications:

- University degree in a relevant social science, such as Sociology, Anthropology, Economics, Law, or Political Science or related fields; or, alternatively, a track record of at least 10 years of relevant experience in the domain
- Minimum 7 years of professional experience in the field of local community mobilization, capacity building, negotiation, and civil society engagement
- Strong knowledge of, and ability navigating governmental processes, including legislative and procurement processes
- Experience with strategy development and execution on national level projects, campaigns, or initiatives
- Demonstrated expertise in effectively engaging with, mobilizing and/or working in community-based groups and civil society organizations, and delivering measurable results
- Experience with stakeholders in the public service sector is highly desirable
- Strong communicator and facilitator with a track record of leading outcome-based multi-stakeholder engagement
- Strong awareness of human rights issues and personal commitment to upholding principles of inclusion, participation, and transparency
- Previous experience with identification-related projects an advantage

Appendix B: Outline for Stakeholder Engagement Plan[38]

Introduction/Project Description

Briefly describe the project, the stage of the project, its purpose, and what decisions are currently under consideration on which public input is sought.

Brief Summary of Previous Stakeholder Engagement Activities

If consultation or disclosure activities have been undertaken to date, including information disclosure and informal or formal meetings/or consultation, provide a summary of those activities, the information disclosed, and where more detailed information on these previous activities can be obtained.

Stakeholder Identification and Analysis

Identify key stakeholders who will be informed and consulted about the project, including individuals, groups, or communities that will be affected by the project or have an interest in the project. Provide a summary of the project stakeholder needs; for example, key characteristics, language, preferred means of communication, or specific needs in terms of accessibility, and so on.

Stakeholder Engagement Program

- **Purpose and Timing of Stakeholder Engagement Program**

  Summarize the main goals of the stakeholder engagement program and the envisaged schedule for the various stakeholder engagement activities: at what stages throughout the project's life they will take place, with what periodicity, and what decision is being undertaken on which people's comments and concerns will be solicited.

- **Proposed Strategy for Information Disclosure**

  Briefly describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups.

- **Proposed Strategy for Consultation**

  Briefly describe the methods that will be used to consult with each of the stakeholder groups.

- **Proposed Strategy to Incorporate the View of Vulnerable Groups**

  Describe how the views of vulnerable or disadvantaged groups will be sought during the consultation process, including how to remove obstacles to participation.

---

38 This outline is a simplification of the World Bank Environmental and Social Framework Stakeholder Engagement Plan (SEP) template, which is available at this address: https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources

- **Timelines**

  Provide information on timelines for project phases and key decisions. Provide deadlines for comments.

- **Review of Comments**

  Explain how comments (written and oral) will be gathered and reviewed, and commit to reporting back to stakeholders on the final decision, as well as a summary of how comments were taken into account.

- **Future Phases of Project**

  Explain that people will be kept informed as the project develops.

Resources and Responsibilities for Implementing Stakeholder Engagement Activities

- **Resources**

  Indicate what resources will be devoted to managing and implementing the Stakeholder Engagement Plan.

- **Management Functions and Responsibilities**

  Describe how stakeholder engagement activities will be incorporated into the project's management system and indicate what staff will be devoted to managing and implementing the Stakeholder Engagement Plan.

Grievance Mechanism

Describe the process by which people affected by the project can bring their grievances and concerns to the project management's attention, and how they will be considered and addressed.

Monitoring and Reporting

- **Involvement of stakeholders in Monitoring Activities**

  Describe any plans to involve project stakeholders (including affected communities) or third-party observers in the monitoring of project impacts and mitigation programs.

- **Reporting Back to Stakeholder Groups**

  Describe how, when, and where the results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholder groups.

Appendix C:
Checklist for Consultation Activities

Good Practices for Planning Stakeholder Consultations Include:

- Prior to the commencement of the process, publish an engagement plan, developed in accordance with the CSO, that clearly establishes:
  - the leadership and governance of the ID project
  - representation of the stakeholders
  - the rules of engagement and process for contribution
  - inclusion and exclusion of inputs
  - decision-making powers and methods
  - accountability and redress
- Communication and advertisement about the consultations well in advance:
  - Plan at least 21 days' notice
  - Reach out proactively to "non-traditional" stakeholders, including marginalized and minority groups
  - Provide details about the contact person for the consultation
  - Publish a summary of the key consultation questions
  - Publish key documentation; for example, draft legislature, background notes, procurement strategies, or risk and impact assessments
- For written consultations:
  - Provide a standardized format for the submissions
  - Indicate the deadline to receive contributions
  - Provide at least 15 days to submit written contributions
  - Explain how organizations and individuals can contribute to the consultation, such as via email or mailing address in cases of written consultation
- For in-person consultations:
  - Planning of a venue/space that is convenient for people to reach and perceived as neutral so that participants are not influenced in their responses
  - Train moderators to take into account the needs of persons with disabilities
  - Planning of water and refreshments for participants, particularly for long events
  - Translation and interpretation of the conversations as well as transcription of the discussions
  - Offer remote participation during public participation meetings, including through video conferencing solutions or online feedback platforms
- After the consultation:
  - Publish all stakeholder submissions on a public platform
  - Provide justification on the inclusion or exclusion of the submitted ideas and input within the final legislation or policy.

This list was initially based on recommendations provided by the KICTANet Think Tank[39] and has been adapted for the purpose of this report.

---

39 Githaiga G., Waigumo Mwanzia S., Kapiyo V. 2021. *Public Participation: An Assessment of Recent ICT Policy Making Processes in Kenya*. KICTANet. July 2021. https://www.kictanet.or.ke/?mdocs-file=43918

Useful References

European Commission. 2021. *Better Regulation Toolkit, Tool #53: The Consultation Strategy*. https://ec.europa.eu/info/sites/default/files/file_import/better-regulation-toolbox-53_en_0.pdf

Githaiga G., Waigumo Mwanzia S., Kapiyo V. 2021. *Public Participation: An Assessment of Recent ICT Policy Making Processes in Kenya*. KICTANet. July 2021. https://www.kictanet.or.ke/?mdocs-file=43918

Hanmer, Lucia; Esquivel-Korsiak, Victoria; Pande, Rohini. 2021. *Barriers to the Inclusion of Women and Marginalized Groups in Nigeria's ID System: Findings and Solutions from an In-Depth Qualitative Study.* Washington, DC.: World Bank Group https://openknowledge.worldbank.org/handle/10986/35507

ID Enrollment Strategies: Practical Lessons from Around the Globe (English). Identification for Development Washington, D.C.: World Bank Group. 2019. http://documents.worldbank.org/curated/en/539361582557916734/ID-Enrollment-Strategies-Practical-Lessons-From-Around-The-Globe

ID4D Practitioner's Guide (English). 2019. Identification for Development Washington, D.C.: World Bank Group. http://documents.worldbank.org/curated/en/248371559325561562/ID4D-Practitioner-s-Guide

IDB. 2017. *Meaningful Stakeholder Consultation.* https://publications.iadb.org/publications/english/document/Meaningful-Stakeholder-Consultation.pdf

Lord, Janet Elaine. 2020. *Creating Disability Inclusive ID Systems* (English). Identification for Development Washington, D.C.: World Bank Group. http://documents.worldbank.org/curated/en/967741605683569399/Creating-Disability-Inclusive-ID-Systems

Masud, Harika; Kumagai, Saki; Grandvoinnet, Helene. 2019. *Mainstreaming Citizen Engagement through the World Bank Group's Country Engagement Model*. Washington, D.C: World Bank Group https://openknowledge.worldbank.org/handle/10986/34074

Metz, A. and Clark, J. 2019. *Global ID Coverage, Barriers, and Use by the Numbers: Insights from the ID4D-Findex Survey (English)*. Identification for Development Washington, D.C. World Bank Group. https://openknowledge.worldbank.org/handle/10986/33430

Principles on Identification for Sustainable Development: Toward the Digital Age - Second Edition (English). Washington, D.C.: World Bank Group. http://documents.worldbank.org/curated/en/470971616532207747/Principles-on-Identification-for-Sustainable-Development-Toward-the-Digital-Age-Second-Edition

The Engine Room. 2022. *Digital IDs Rooted in Justice: Lived Experiences and Civil Society Advocacy Towards Better Systems.* https://www.theengineroom.org/community-call-digital-ids-rooted-in-justice/

World Bank. 2014. *Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations.* https://openknowledge.worldbank.org/handle/10986/21113?locale-attribute=en

World Bank. 2015. *Opening the Black Box: The Contextual Drivers of Social Accountability.* https://openknow ledge.worldbank.org/bitstream/handle/10986/21686/9781464804816.pdf?

World Bank. 2018. *Guidelines for ID4D Diagnostics,* Washington, DC: World Bank. https://documents1. worldbank.org/curated/en/370121518449921710/Guidelines-for-ID4D-Diagnostics.pdf

World Bank. 2021. *Community Solutions for Improving Women's Access to ID in Nigeria.* https://blogs. worldbank.org/africacan/community-solutions-improving-womens-access-id-nigeria

World Bank. 2021. *Realizing the "Transformational Trilogy" of Social Protection Delivery in the Philippines.* https://blogs.worldbank.org/eastasiapacific/realizing-transformational-trilogy-social-protection-delivery-philippines

id4d.worldbank.org