



**Caribou
Digital**

Identity at the margins: Identification systems for refugees

**A Caribou Digital report, authored by: Emrys
Schoemaker, Paul Currion, Bryan Pon**

Overcoming the barriers to interoperability in the humanitarian sector will require a sector-wide working group that can agree to a lightweight framework for interoperability amongst existing systems; importantly, for increased interoperability to improve, and not worsen, the agency and dignity of beneficiaries, they must be involved in the design process

Our research¹ found that the institutional and financial costs of lack of interoperability are becoming clearer. CARE's experience in Azraq camp, related earlier in this report, led one staff member to note that "sometimes you will go to a location and see 20 staff doing nothing but opening their laptops," but such stories can have a happy ending: each of those staff were estimated to save 2-3 hours per day once they move to the CARE Database System, a total time saving of 40- 60 person-hours per day.

By contrast, the costs and benefits to refugees—of both the status quo and proposed changes—have not been accounted for in any depth. While there is well-documented² frustration with duplicative research assessments from which they see no benefit, there was no indication from refugees that multiple registrations were wasting their time, in part because registration for services provides tangible value. As one respondent in Bidi Bidi said, "time is the one thing we do have"—anecdotes such as this merely underline the fact that almost no aid organizations have properly measured the costs incurred by refugees due to poor data management.

Thus what emerges from the research is a humanitarian system that talks the language of accountability, but which is actively building systems which makes accountability difficult, if not impossible. This is not because humanitarian organisations are working against accountability, but because the main drivers of information system development are internal management requirements rather than transparency or refugee needs. Institutional interests set a direction, and path dependency then makes it difficult to adapt at a later date.

There is positive movement; policies have been developed, systems are being secured, and approaches such as "privacy by design" are increasingly being discussed. However, critical weaknesses in the humanitarian sector's approach to data requirements remain, and until the refugee perspective is more fully understood and incorporated into design processes, humanitarian data regimes will continue to fall short of the promises made to the refugees themselves.

Based on our review of the landscape, our interviews with staff at headquarters and field level,

¹ See Identity at the Margins (Caribou Digital, 2018) - <https://medium.com/caribou-digital/report-launch-identity-at-the-margins-identification-systems-for-refugees-69466244fa62>

² 48 Parham et. al., "Lessons from assessing the humanitarian situation in Syria and countries hosting refugees," (November 2013), <https://odihpn.org/magazine/lessons-from-assessing-the-humanitarian-situation-in-syria-and-countries-hosting-refugees/>

and our discussions with refugees themselves, our conclusion is that it is neither possible or desirable for any one single identity system to solve all problems and address all the needs of every humanitarian organization. Institutional requirements and capabilities vary widely, and organizations will always need their own internal systems dedicated to their specific operations.

Instead of focusing on the quality of a single identity system, we propose an approach that focuses on enabling the development of a healthy ecosystem constituted by diverse data regimes. These diverse data regimes, designed to meet the needs of all stakeholders in the humanitarian system, supported by the right set of incentives to build compliance, will contribute to good identity ecosystem outcomes—including the privacy and security of refugees. In this final section we describe what we consider to be the optimal approach to improving interoperability through data standards, and outline what steps key stakeholders can take to achieve this.

Sunk cost investment in existing systems means organizations are very unlikely to wholly substitute existing systems in favor of a new solution, regardless of its benefits. The focus should instead be on developing a lightweight layer of common standards that each organization can map to its own data when importing and exporting to other entities. This layer should build on the core data fields of the proGres database and the technical foundation of the Humanitarian eXchange Language (HXL) to incorporate beneficiary data and related attributes into data exchange standards.

The requirement for interoperability has become too pressing to ignore, and the need for progress towards standards—including not just technical, but organizational and legal—has become urgent. The benefits are potentially enormous: Investments in data management, particularly in interoperability, will release more staff time from collecting and sharing data to focus on accountability, including data accountability; will help address inefficiency and reduce fraud; and will strengthen data protection across the entire sector by minimizing the number of weak links.

If this is combined with investment into participatory design to ensure that refugee perspectives are included, and that they are given more control over their data—including determining which organizations can access that data, and delegating authority to those organizations as desired—the humanitarian community will finally be able to capitalize on the full potential of digital technology in identity and data management.

Recommendations for Donors

As an immediate short-term measure, donors should convene a group of donors to align their requirements for policy and practice around data protection, to fund further research into good practice, and to ensure a common approach (for example using the GDPR as a baseline for discussion). They should then use this common approach as the basis for lobbying host governments to ensure data protection legislation extends to displaced peoples; and as a way of engaging implementing agencies (including the Red Cross/Red Crescent movement, UN agencies, and NGOs) in a wider dialogue on data protection and related issues.

The humanitarian community should ensure that “data accountability” is built into future policy and guidance documents for Accountability to Affected Populations (AAP) and other accountability initiatives, such as the Humanitarian Ombudsman.

Donors should support the formation of a short-term multi-stakeholder working group on interoperability, the goal of which will be to agree on an initial baseline standard for interoperability and establish the governance requirements for a longer-term standards body with a specific focus on identity data. The working group should comprise key humanitarian stakeholders, and could be formed under an existing structure (such as the IASC), existing organization (such as the Sphere Project), or existing process (such as HXL development). The NGO consortium that supported this project has a history of engaging on these issues and could serve as an initial forum for said working group.

Donors should support UNHCR to co-chair the working group under its mandate for refugee protection; and also as part of its commitment to opening up proGres to make it both more accessible to service users and more interoperable with other service providers through APIs (since these will only be useful if there are participating organizations on the other side of those APIs). However implementing organizations will need to be fully engaged in order to ensure the success of any standards body, and an NGO representative should fill the other co-chair position.

Donors should support the working group to develop a “translation layer” to enable interoperability between the data management systems of diverse service providers. This would initially be based on a core set of fields that incorporate beneficiary data and related attributes into data exchange, to be maintained alongside (if not integrated into) HXL.

To be as inclusive as possible, the solution should be based on a lightweight set of data and semantic standards that any organization can read/write using APIs or manual translation/tagging; we recommend this be built on HXL. Taking this forward would later become the responsibility of the standards body, which would maintain it as an open (rather than proprietary) standard.

The working group should therefore focus on operational requirements rather than legal mandates, establishing a translation layer that accommodates legal credentials, such as those issued by UNHCR, as well as functional credentials recognised by both governmental and non-governmental service providers. Although legal registration would continue to be important,

this translation layer would ensure more consistent access to services, and enable portability between services even in the absence of legal identification.

The provision of a translation layer would enable interoperability of functional identities and reduce the dependence on legal refugee status as a prerequisite for obtaining access to needed services, removing barriers to access and strengthening inclusion.

The standards body should develop explicitly as a successor to the working group, but be open to a wider range of stakeholders. Since these will potentially include commercial vendors and government bodies, it will need to be a new technical body rather than formed under the auspices of any existing structure, in order to maintain its independence from any single stakeholder or set of stakeholders.

This should draw on experience in establishing technical standards in the humanitarian sector (e.g. SPHERE, HXL) as well as experience from other industries (e.g. OIX, W3C) to create a more rapid and flexible development process than earlier efforts. As well as developing and maintaining technical standards, the standards body should also promote core design principles for implementation of the standards—specifically privacy, portability, and shareability by design.

The standards body should establish a compliance framework. The success of these standards will be dependent on the degree of adoption; the standards body could adopt a “command” mode, but a voluntary, incentive-based strategy would be more effective, as the fragmented nature of the sector means a mandatory approach would likely fail.

A possible incentive could be a kitemark, which could be displayed by service providers who meet the standard. Donors (institutional and individual) could use the kitemark as a criterion for supporting service providers, and which beneficiaries could refer to it as part of a broader accountability framework. Commercial vendors who comply with the standards would be able to display the kitemark, which humanitarian actors could then use as a criterion for selecting responsible vendors.

The standards body should also be the hub for a network of trusted organisations—not necessarily limited to UNHCR implementing partners— whose procedures for onboarding refugees have been verified (through external audit, peer review, or some other process) and who can subsequently issue a functional identity on behalf of the entire network.

This trust network would mean that once a refugee has been through the onboarding process with one organization, they would not be required to go through it again with any other organization within the trust network; and larger service providers could offer their identity data as an authentication service to smaller organizations. It may be possible in some countries to extend the trust network to a wider set of service providers (for example, government departments and commercial vendors), which could support refugee integration into services beyond the initial humanitarian response.

Donors should incorporate data management into the funding process, in order to unlock resources for organizations that are struggling with a lack of capacity. While there is a need for investment at a systemic level—a paradigm shift that recognises that data management must be taken more seriously as a core element of humanitarian operations— medium-term steps by

donors could involve:

- Incentivizing better data management through integrating it into proposal criteria and project evaluation more explicitly;
- Including data management as a separate and protected budget line in every project proposal;
- Funding more pilots that test new approaches to data management, not limited to developing new software but also new processes;
- Engaging at the senior management level in order to ensure that there is increased internal support for better data management;
- Agreeing a common requirement for the inclusion of data in agency reporting, easing the burden on agencies' data collection;
- Incorporating funding for better data management into host government capacity building, including service ministries, cartographic and statistical offices.

Donors should particularly support the development of open-source biometric standards and solutions, such as those advocated by iRespond and Simprints, in order to create a more inclusive approach to biometrics overall. Biometrics are a controversial yet central part of identity management in humanitarian response, either in a full-stack identity provision model or through a dedicated biometric service provider (BSP) model: both approaches free humanitarian organizations from having to stay up-to-date with a highly specialized, quickly evolving technology sector.

Depending on the system design, these approaches reduce organizational liability for handling sensitive personal data by absolving them from having to process or store biometric data, which would be completely separate and outside the organization's control; and the ability to pay for complete identity management and/or biometrics as a service instead of a capital investment in hardware and system would be potentially valuable.

Crucially, humanitarian service providers, supported by donors, should invest more in participatory design to ensure ethical identity systems. The research found that individuals have limited understanding of what their data is used for, no visibility into the way their data is shared, and no ability to exercise control over their data. Investment in user experience and data literacy will help refugees make informed choices about their data, potentially increasing registration as common concerns about data sharing are addressed. These measures could also be incorporated into wider communications and accountability mechanisms, particularly regarding policies and practices around informed consent.