development initiatives

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harmonising registrations and identification in emergencies in Somalia

briefing

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Background

This briefing highlights the benefits, risks and challenges associated with establishing an integrated data system for cash transfer programming (CTP), based on the findings of a study that examined how different humanitarian agencies in Somalia are managing the collection, analysis and sharing of identification and registration data in cash transfer programmes (CTPs). It also provides policy recommendations for creating an enabling environment for harmonising data systems.

Since the early 2000s, humanitarian agencies have increasingly been responding to the complex and longstanding humanitarian crisis in Somalia through CTP. The use of CTP is underpinned by the presence of functioning markets and financial services providers in Somalia and the fact that it promotes dignity and choice among recipients. Evidence shows that cash transfers enhance access to food and non-food items to alleviate human suffering and rehabilitate livelihoods at the household level.[1,2] However, CTP in Somalia is plagued by data challenges related to identifying and registering recipients, authenticating identity, preventing duplication and protecting personal data. This calls for the development of an integrated information system to ensure the equitable, responsive and efficient delivery of cash transfers.

Harmonised data systems for CTP

CTP involves five distinct processes: targeting and selecting recipients, registration, enrolment, delivery of payment and management of complaints and grievances (Figure 1). Quality data and information are prerequisites for effective implementation of each of the five processes. However, in emergency contexts that are also characterised by insecurity, limited accessibility and weak governance structures, as is the case in Somalia, the ability of humanitarian agencies to collect, analyse and share data is constrained. Current thinking on enhancing the efficiency and effectiveness of CTP in humanitarian contexts underscores better strategic, operational and technical coordination, including enhancing interoperability between databases and sharing data between agencies.

Figure 1: Processes in cash transfer programming

Targeting → Registration → Enrolment → Payment delivery → Complaints management
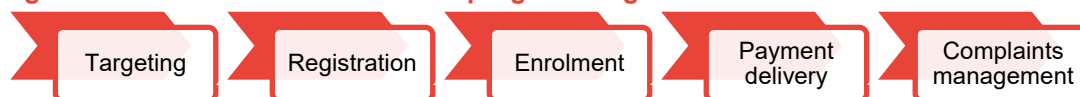
At least two approaches can be used to integrate CTP data systems – developing an integrated beneficiary registry or developing a social registry. These approaches should ideally be complementary, since each has limitations that the other helps to address.[3] Integrated beneficiary registries integrate data from the management information systems (MIS) of various programmes to provide consolidated data, such as who receives what from who and over what period. Social registries, on the other hand, are information systems that facilitate outreach, intake, registration and assessment of potential eligibility for various social protection programmes.[4] Unlike social registries, the coverage of integrated beneficiary registries is often limited to the people enrolled rather than all potential recipients of assistance. While integrated beneficiary registries are relevant where the main objective is to facilitate coordination, deduplication and oversight, social registries serve mainly as targeting databases by providing information on households, ranked according to their well-being, to target social assistance to the poor.[5] Somalia does not currently have either of these integrated data systems, and while humanitarian agencies have developed their own databases to deal with this challenge, there is limited interoperability between them. This makes it difficult to prevent overlaps or duplication of assistance, improve coordination and evaluate the effectiveness of CTP, due to the limited sharing of data.

There are some initiatives by humanitarian actors, donors and the Federal Government of Somalia to harmonise data systems, but more effort is needed to develop an effective solution. For instance, various consortia of humanitarian agencies, such as the Somalia Cash Consortium, have data-sharing agreements in place and are using harmonised registration forms and a common database. Despite this, data is shared only in situations where the partner agencies are implementing a joint programme funded by a common donor. A few United Nations agencies such as the World Food Programme (WFP) and United Nations Children's Fund, and international non-governmental organisations such as World Vision and the Danish Refugee Council, have bilateral agreements involving the sharing of a registration platform. WFP and the United Nations High Commissioner for Refugees have established interoperability between their databases. Additionally, a group of donors led by European Civil Protection and Humanitarian Aid Operations are exploring ways to establish interoperable databases or registries for Somalia, while the government is working with the World Bank to establish a unified registry. However, these initiatives by donors and the government are in the preparatory stages and may take a couple of years to be completed.

The benefits and risks associated with harmonising data systems

An integrated data system has a number of benefits. The effective flow of information between cash transfer programmes and beyond can improve aid effectiveness by preventing overlaps and duplication of assistance through sharing registration data. Coordination and caseload planning can also improve if integration facilitates access to information on who has been registered, the type of cash transfers they receive, who provides the assistance and the duration of the assistance, to determine the gaps in meeting existing needs. Sharing registration data can ensure cost savings and increased efficiency by supporting the establishment of common processes such as joint payment mechanisms. Importantly, integration can enhance transparency and accountability by enabling the sharing, analysis and comparison of programme data.

While harmonising data systems has clear benefits, it also comes with significant data protection, fiduciary and legal risks. Data privacy and protection risks can arise from unauthorised sharing of personal data, covert surveillance and the hacking or scamming of databases. In a conflict-affected country like Somalia, personal data leaks can put at risk the security of recipients of cash assistance, who can be targeted for violence or harassment because of their political or clan background or because they have received aid. Leaks of personal data also have negative implications for the reputation of humanitarian agencies. Fiduciary risks may arise from human error and/or the manipulation of data. Aid delivery decisions may be informed by inaccurate data from a third party, arising either from genuine mistakes made during registration or deliberate manipulation, such as adding militias or 'ghost' recipients to a beneficiary list. This leads to aid diversion, which also poses significant reputational risks to humanitarian agencies and their donors. The legal risks associated with harmonising data systems include the possibility of breaching data protection legislation, such as the European Union's General Data Protection Regulation, which applies to some agencies in Somalia and which can lead to financial penalties if breached.

Challenges facing harmonisation of data systems

Humanitarian agencies use different identification mechanisms, which poses an additional challenge for harmonisation. A key requirement for creating interoperability is a common unique identification mechanism that can effectively match and link datasets across databases. However, Somalia lacks a foundational identification (ID) system, forcing humanitarian agencies to rely on different non-interoperable ID systems, including programme-specific functional IDs, phone numbers and biometrics. The government is working to develop a digital ID system, but this project might take many years to complete due to insecurity and inaccessibility, as well as technical, financial and political challenges.[6] There is also limited standardisation of data fields, which hinders the establishment of interoperability.

For instance, names are spelt differently depending on whether they are recorded in English or Somali, there is no consistency in the way that biometric data is collected and saved, and the definition and measurement of data variables are different across agencies. Humanitarian agencies are also using different eligibility criteria for their CTPs, leading to diverse data requirements that limit the extent to which data can be shared. This is exacerbated by a lack of trust in the quality of shared data.
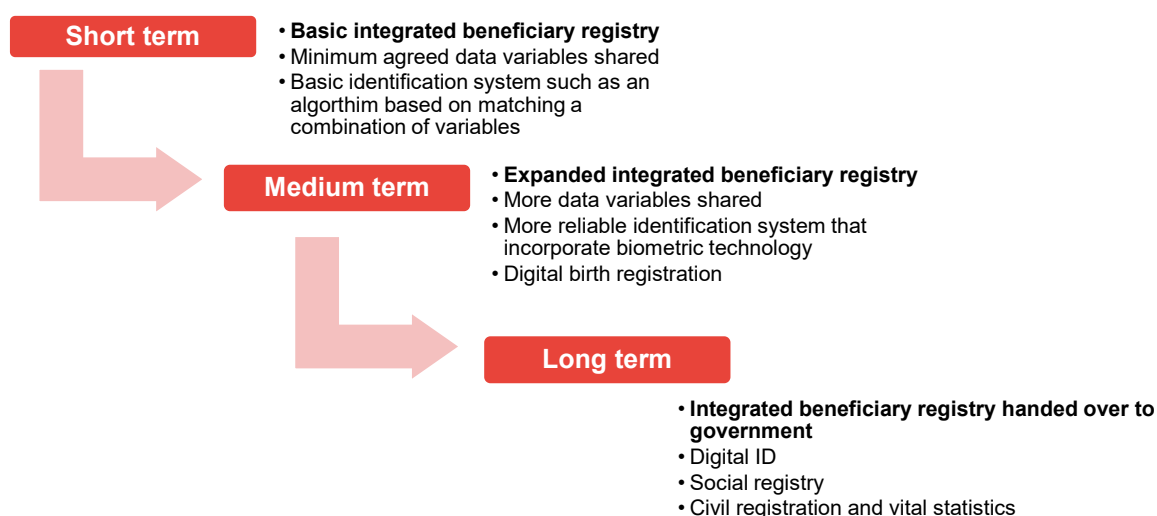
Inadequate donor leadership also slows the harmonisation of data systems. Donors lack a common stance on harmonising systems, leading to poor coordination of efforts and mobilisation of the needed resources. Moreover, the politics of ownership and control over access to data prevents collaborative efforts towards harmonising data systems. Since CTP in Somalia is determined to a great extent by the ability to access populations in need, controlling access to registration data is seen as a competitive advantage, as donors prefer to work with agencies with large databases on the premise that such agencies can reach many vulnerable households. Fear of the potential disruptions that harmonisation could cause to the current operations of humanitarian agencies leads to resistance. Moreover, major providers of cash assistance have already invested in different customised MIS, which they are not willing to abandon in favour of a common system. This means that it is more practical to promote interoperability between existing systems rather than promote the adoption of a single platform.

Developing data-sharing agreements that conform to the different organisation-level policies remains a significant challenge. Somalia has a weak legal framework for data protection, which has contributed in part to the development of a number of varying organisation-level data protection protocols and policies. This has led to differences in understanding about what should be shared, how it should be shared and how the shared data should be used or protected.

A roadmap to a harmonised data system

In the short term, a key objective of humanitarian agencies and donors is to establish a data system that can facilitate deduplication, coordination and planning. Nonetheless, there is no reliable unique identification system, and humanitarian agencies are willing to share only a few data variables due to the risks highlighted earlier. In the long term, there is concurrence that a registry that can support social protection programmes should be developed. Accordingly, a harmonised data system can be achieved in three phases (Figure 2):

Figure 2: A roadmap to a harmonised data system

Short term
- **Basic integrated beneficiary registry**
- Minimum agreed data variables shared
- Basic identification system such as an algorthim based on matching a combination of variables

Medium term
- **Expanded integrated beneficiary registry**
- More data variables shared
- More reliable identification system that incorporate biometric technology
- Digital birth registration

Long term
- **Integrated beneficiary registry handed over to government**
- Digital ID
- Social registry
- Civil registration and vital statistics

Short term: a basic integrated beneficiary registry co-owned by donors and humanitarian agencies should be developed for coordination, deduplication and planning. This registry is basic in the sense that it will host only the minimum data variables that humanitarian agencies are willing to share. While biometrics and a foundational ID system would provide the most appropriate identification mechanisms to operationalise the registry, developing these in the short term poses a significant challenge due to political, financial and technical constraints. As the experience of Brazil illustrates, an algorithm based on matching a combination of variables, such as name, mother's name, location and phone number, to determine potential duplication could be considered as a short-term solution. While these algorithms are not always 100% accurate, they could provide a short-term fix to identification challenge in Somalia.

Medium term: the integrated beneficiary registry should be expanded as humanitarian agencies agree to share more data variables. Furthermore, a more reliable identification system that incorporate biometric technology should be adopted.

Long term: the integrated beneficiary registry should be handed over to the government upon creating adequate legal and institutional arrangements, a foundational ID should be established, and the coverage of the registry should be expanded. Additionally, a social registry could be created to serve as a targeting database for government-led social protection programmes, depending on the long-term policy objectives of the country.

Recommendations

Humanitarian agencies

Harmonise data fields in the short term by developing and adopting a common standard that specifies the level at which data should be collected (household or individual), the meaning of data variables and data structures/formats to be used by all. Additionally, a common international standard, particularly the ISO/IEC 19794-1:2011 standard, should be adopted to inform the collection of biometric data to ensure interoperability.

In the short term, develop and implement policies that outline effective measures to protect personal data. These can include measures such as encrypting data, removing personal identifiers when sharing data (unless needed for specific functions), discarding data that are no longer needed for programme activity or storing them in an anonymous format, adopting role-based access to data to prevent leakages and adopting data management platforms with adequate security features.

Establish cross-agency data sharing agreements and policy in the short term that define the data variables that can be shared, as well as how to monitor data security, protect data when sharing it, enforce data protection protocols and address conflicts related to sharing and using data.

Improve data quality progressively, starting by developing a common policy or standards for data collection, cleaning and validation in the short term and implementing these consistently. This will encourage the sharing of data through better trust in the quality of data from external sources.

In the short term, work with donors, the Cash Learning Partnership (CaLP),[7] the government and the private sector to develop an algorithm based on matching a combination of a selection of identification variables, such as name, mother's name, location and phone number to determine potential duplication in the absence of a national ID system.

Donors

Adopt a coordinated approach to harmonising data systems. Donors should work with humanitarian agencies, the government, the Cash Working Group (CWG)[8] and the CaLP in the short term to develop a shared vision and objective for harmonising data systems collaboratively.

Provide financial and technical support to humanitarian agencies in the short and medium terms as an incentive to harmonising data systems.

In the short term, develop and adopt a policy of working with consortia (where appropriate) to implement CTPs using streamlined targeting, registration, distribution and monitoring and evaluation approaches, underpinned by interoperable databases, harmonised data collection tools and data-sharing agreements. Working with consortia can reduce the competition among humanitarian agencies for funding, which prevents collaborative efforts in harmonising data systems, while donors can benefit from efficiencies arising from working with consortia rather than managing multiple grant contracts with different agencies.

Federal Government of Somalia

In the short term, enact legislation and a policy to guide the protection, sharing and using of personal data. Such legislation will play an important role in creating clarity on what should be shared to facilitate the establishment of enforceable data-sharing agreements.

In the long term, complete the development and roll-out of a digital ID system to support effective identification and verification in CTPs. This will require establishing a legislative and institutional framework to develop IDs, as well as investment in a civil registration and vital statistics system in phases, starting with a digital birth registration system and the issuance of ID numbers at birth in the medium term to provide breeder documents such as birth certificates to facilitate the issuance of IDs.

Notes

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[6] World Bank. 2016. Toward a Somalia identification system: ID4D diagnostic. Available at: http://pubdocs.worldbank.org/en/185701524689472792/Somalia-ID4D-Diagnostic-Web040418.pdf

[7] CaLP is a global partnership of humanitarian actors engaged in policy, practice and research in the area of cash and voucher assistance. More information is available at: http://www.cashlearning.org/about-us/overview

[8] The CWG is a forum for agencies implementing cash and voucher assistance in Somalia to engage, share learning and coordinate activities. More information is available at: http://www.cashlearning.org/downloads/2019-somalia-cwg-tor--final.pdf