CAPRI

Who Am I?
The People dem
NIDS

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The People dem NIDS

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Executive Summary

The lack of a single trusted identification in Jamaica costs its citizens in several ways. This cost is reflected in their inability to access essential services, such as financial and social services, and the loss of potential productivity.

13%
of adults
are unable to access bank accounts

3%
of adults
are unable to access social protection programmes

This study explores the implications of a national identification system for Jamaica and provides evidence to support the need for a national identification card, including its economic value.

Jamaica does not presently have an identification that serves as a general-purpose identification, usable across all activities. Such IDs, known as foundational IDs, are usually created with the general population in mind, rather than a specific group of citizens. It is the norm in many jurisdictions that such IDs are universally available and are used for multiple purposes. In Jamaica, instead of using a foundational ID, functional IDs, such as passport, electoral ID, and driver's licence, together with the TRN, are used to authenticate citizens' identity. Those means of identification were not intended to verify identities in other contexts, or by third parties, but rather to meet the objectives of the issuing organizations. These current ID systems are not only limited in their coverage and, for some, costly to obtain, but there is a lack of

interconnectivity; that is, each system's collection, processing, storage, and management of identity data is isolated from each of the others.

The coverage gained from the current IDs is restricted due to the functional specificity of each ID. Currently, only 25 percent of the adult population has a valid driver's licence, 43 percent have a valid electoral ID, and 56 percent have valid passports. None of these are necessary for a citizen to obtain except for the specific activities associated with each. Thus, many people are excluded from having any identification, particularly those in vulnerable groups.

The lack of a single trusted identification in Jamaica costs its citizens in several ways. This cost is reflected in their inability to access essential services, such as financial and social services, and the loss of potential productivity. Approximately 13 percent and 3 percent of the adult population are unable to access bank accounts and social protection programmes, respectively, because of a lack of identification.

Additionally, persons who are unable to access remittance services because of no ID potentially lose, on average, US$206 per transaction.

Bank accounts, social welfare programmes, and remittance services are services that improve the financial resilience of citizens, but more so, the most vulnerable; with an improvement in finances, overall welfare tends to increase. With one in every five persons unbanked, engaging in transactions such as encashment and bill payment is more costly. On average, it costs J$318 to change a cheque and, for Jamaicans that utilize in-person methods of bill payment, J$6,825 is forgone from potential productivity.

Procuring the current forms of identification is associated with direct and indirect costs and operational barriers. For the driver's licence and passport, it costs each applicant at least J$10,000 (inclusive of provisional licence and driver's test,) and J$4,000, respectively. However, to obtain either, a JP's certification is required which, in terms of potential

The lack of a single trusted identification in Jamaica costs its citizens in several ways. This cost is reflected in their inability to access essential services, such as financial and social services, and the loss of potential productivity.

productivity, presents a loss of J$1,850. On the contrary, although the voter's identification is free, the operational procedures make it difficult to attain. It can take up to four months as it depends on the date the applicant's name is published on the voter's list. Also, based on electoral legislation, applicants are required to have an address. As such, homeless persons are excluded.

These means of identification are not only costly but are limited in coverage as persons living in rural areas, and youths, are being underserved. As Jamaica's sole repository of vital life events, the RGD leaves four parishes without access as there are only ten offices; each civil registry serves 270,000 people. PICA has twelve offices island wide and the Island Transport Authority has 13 motor vehicle depots, of which three are situated in Kingston & St. Andrew. It is also possible that youths under seventeen years old become unattached because of

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12

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13

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the current means of access. First, these youths are only eligible for a passport, which is costly, and second, to enroll in youth employment programmes, at the very least, a TRN is required. This TRN must be sorted out by a parent or

guardian. The likelihood of a potential unattached youth having a parent or guardian who would take that initiative is probably quite low, making the process of obtaining an identification more difficult.

A universal national ID system provides a reliable and secure means of identifying individuals in the provision of essential services, to the benefit of the ID holders. Incorporating the use of digital tools will further increase the benefits as citizens will now be able to engage in electronic transactions such as e-government services, which feature is absent from the current, functional IDs. Access to these digital tools are even more relevant during pandemics, like Covid-19. With the privacy and security features recommended, Jamaicans will be able to confidently prove their identities, without having to provide other documentations, and thereby access and benefit from public and private services, both existing and newly facilitated ones.

Recommendations

In consideration of the foregoing benefits to be gained by the holders of a universal, foundational identification, the new services it will facilitate, and the constitutional challenges to the government's initial proposal, the following recommendations are put forward:

1 Citizens should be encouraged and incentivized to enroll in the universal ID system when it is promulgated by the government. While some of the benefits to them will be self-evident, the broader benefits that will accrue to the economy, and so ultimately redound to them, will be less obvious, and should be explained.

2 For widespread adoption and for the benefits of the system to be fully harnessed, the system should have strong incentives for enrollment in order to realize the broader benefits of a universal system. Although a voluntary-based system in Jamaica, void of incentives, will not achieve steady adoption for the ID, by mandating the leveraging of the ID for e-government services, social programmes, and KYC requirements, widespread adoption can be achieved.
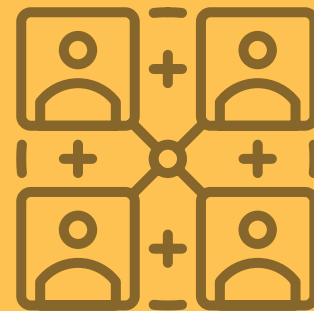
3 In requiring biometric and biographic information for the issuance of the ID, legislation must enforce the least intrusive methods necessary to achieve widespread adoption and maximum benefit. Currently, for Jamaica, only fingerprints of all fingers and a facial image should be necessary to generate an ID. For biographic information, only registrable individuals' first and last names and date of birth should be required. The address, other names of the individual, job, ethnicity, or other biographic information, should be optional. However, because of the dynamism of technology, whether biometric or otherwise, the recommended features may require re-evaluation.

4 The first phase of the system should issue the identification to beneficiaries of social welfare programmes. The ID will facilitate the interoperability of welfare databases and will help to increase the effectiveness of the programme by ensuring that the intended beneficiaries are reached.

5 The second phase of the system should target public sector workers because they can be used as a pilot. The third phase can expand to rest of the citizenry and permanent residents.

6 Persons who this ID will benefit the most are the most unreachable, so integrating identification enrolment with the upcoming census will help to capture these persons and give them the opportunity of registering for the ID immediately.

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Acronyms

eID	Digital Identification		Authority
e-government	Electronic Government	NIDS	National Identification System
ECJ	Electoral Commission of Jamaica	NIN	National Identification Number
ePrescription	Electronic Prescription	NIR Act	National Identification and Registration Act
eHealth	Electronic Health		
GDPR	General Data Protection Regulation	NIS	National Insurance Scheme
GOJ	Government of Jamaica	PATH	Programme for Health and Education
ID	Identification	PICA	Passport, Immigration and Citizenship Agency
ISO/IEC	The International Organization for Standardization/International Electrotechnical Commission	PKI	Public Key Infrastructure
		RGD	Registrar General Department
JP	Justice of the Peace	SDG	Sustainable Development Goals
KYC	Know Your Customer	TAJ	Tax Administration of Jamaica
LOA	Levels of Assurance	TRN	Tax Registration Number
NADRA	National Database and Registration	UID	Unique Identifier

1 Introduction

An estimated

200,000 JAMAICANS

nearly one in ten of persons above 18 years old

DO NOT HAVE PROOF OF LEGAL IDENTITY

When the vulnerable community of Mount Salem, St. James, was declared Jamaica's first "Zone of Special Operations" (ZOSO,) the first social intervention that was undertaken was to provide identification to the community's residents.[1] The Jamaica Social Investment Fund (JSIF,) the state entity leading the social aspect of the ZOSOs, held a two-day fair where more than 500 people—over 10 percent of the community's population—were photographed, and their identities verified by a team of Justices of the Peace.[2] A provisional identification was thus made for each person.[3] JSIF, whose mandate in Mount Salem was to re-engage state services in the community, had first to establish just who the community's residents were, so they could account for who services were to be delivered to. For many residents, they were issued with some kind of official identification for the first time in their lives.

What might appear to be an extraordinary situation in Mount Salem is actually representative of the entire country. An estimated 200,000 Jamaicans—nearly one in ten of persons above the age of 18 years old—do not have proof of legal identity. Referred to as "undocumented," these persons are not able to access and benefit from public goods and services, because they are not able to prove their identity. Were they able to overcome this obstacle, they would be positioned as potential beneficiaries of social programmes such as the cash transfer welfare programme, the Programme of Advancement Through Health and Education (PATH,) and they would be able to access and benefit from formal financial services, among many other private and public services.

Digital identification (eID) is a collection of electronically captured and stored identity attributes that uniquely describe a person within a given context; more importantly, eIDs are used to securely engage in electronic transactions, especially those requiring digital authentication and signature.[4] Digitizing an identity offers a simple means of capturing personal identification and has the capacity to reach far more people than traditional paper-based or functional identifications can. Universal deployment of these eIDs could put financial, social, and electronic government (e-government) services within the reach of persons

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1 In 2017 the Jamaican government announced "The Law Reform (Zones of Special Operations) (Special Security and Community Development Measures) Act 2017," commonly known as the ZOSO Act. The ZOSO Act gives the prime minister the power to designate any community a "zone" that requires the focused attention of security personnel and social services because of high rates of violence within the community. In September 2017 the first ZOSO was established in the community of Mount Salem in St. James. The government also declared a State of Public Emergency (SOE) in that parish.

2 "JSIF assisting Mount Salem residents to get official documents," RJR News, September 11, 2017, http://rjrnewsonline.com/local/jsif-assisting-mount-salem-residents-to-get-official-documents.

3 JSIF followed up on this initiative by working with the Registrar General's Department to obtain birth certificates, as a first step to obtaining other forms of state-issued identification. This is standard procedure for the JSIF upon engaging any vulnerable community in its work.

4 World Bank, "Technical Standards for Digital Identity," Draft for Discussion, 2017, http://pubdocs.worldbank.org/en/579151515518705630/ID4D-Technical-Standards-for-Digital-Identity.pdf.

Digitizing an identity offers a simple means of capturing personal identification and can reach far more people than traditional paper-based or functional identifications can.

previously excluded because of a lack of ID. A trusted and inclusive identification system can serve as a powerful tool for development, accelerating progress in numerous areas, such as identity management, financial and social inclusion, and can facilitate access to and delivery of services.[5] Ensuring universal access to identification is the first step in utilizing this tool.

This study explores the implications of a national identification system for Jamaica. The goal is to provide support for a digital national ID system that delivers on the potential of such an instrument, having fully considered the resistance against the initial attempt. In doing so, the report will bring evidence to support the need for a national identification card, including its economic value, and will address the misconceptions about the legal inconsistencies with the original National Identification and Registration (NIR) Act. The report will:

- Provide the historical context of the NIR Act in Jamaica, including the

> # A universal identification is the first step in accelerating progress in areas of development.

constitutional breaches observed in the first attempt to pass the legislation

- Specify the drawbacks of the extant functional identification systems in Jamaica that are used in the place of a foundational identification system

- Describe the global context of digital national identification systems and their impact on development

- Explore the features and frameworks of such identification systems, and

- In providing context for Jamaica, examine the value of a digital ID; that is, quantify the problem of not having any form of identification.

From this assessment, the report offers recommendations on an identification system suited for Jamaica.

Methodology

The research towards the production of this report deployed a mixture of quantitative and qualitative methods. Through desk research, we identified and itemized potential benefits of a robust and comprehensive digital identification system. From that, we determined a subset of benefits that are particularly important and potentially transformative in the Jamaican context. Primary data was gathered through a national survey that was conducted in November 2019. This data was used to quantify the extent of financial and social exclusion in support of the arguments for the benefits to be gained from a national ID.

5 Identification for Development, "Global ID Coverage, Barriers and Use by the Numbers: Insights from the ID4D-Findex Survey," December 2019, http://documents.worldbank.org/curated/en/953621531854471275/Global-ID-Coverage-Barriers-and-Use-by-the-Numbers-Insights-from-the-ID4D-Findex-Survey.pdf.

2 Digital ID Systems and Development: The Global Context

The ability to
ACCESS BASIC SERVICES AND ENTITLEMENTS,
and participate fully in society and the economy,
stems from the ability to prove one's identity.

HEALTHCARE

PENSIONS

AGRICULTURAL SUBSIDIES

The right to a legal identity is a fundamental human right; at its most basic level, the state is obliged to enable each person to exercise his or her right to a name. Robust and inclusive identity systems are vital to development, and are enshrined in the Sustainable Development Goals (SDG) Target 16.9, encouraging governments to provide a legal identity, including birth registration, for all its citizens by 2030.[6] The ability to access basic services and entitlements, from healthcare to pensions and agricultural subsidies, and participate fully in society and the economy, stems from the ability to prove one's identity.[7] Other SDGs demonstrate the need for efficiency and for citizens to have access to digital systems; hence, the introduction of eIDs globally.

Digital IDs have been and are being implemented in many countries around the world. They have the potential to boost the trajectory of a country's development. Their benefits are evident in, but not limited to, the financial, social, and health sectors. Governments, in creating a citizen-centric system, experience cost savings; equally important, they facilitate an increase in citizen satisfaction and convenience.

There is growing momentum, globally, to fill the identification gap. Over the past decade, there has been marked growth in the number of governments who have introduced new, or improved existing, national identification programmes.[8] The core objective of these efforts is to create a foundational identity issued and recognized by government, typically by law, for inclusion, and concurrently, support the development of functional identities.[9] Such ID systems can leap-frog traditional identification programmes in countries where functional IDs have been established but have not achieved widespread adoption. For countries on the other end of the spectrum, where functional IDs have, seemingly, taken the place of a foundational ID, these systems can further provide the support needed to widen identification access to the unregistered population.[10] Citizens with existing identification are afforded the opportunity to switch to digital IDs, enabling them to capitalize on the benefits of e-governance, e-commerce, and other digital services.

Citizens in countries that have leveraged digital IDs have benefitted from the

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6 World Bank (2017), Ibid.

7 Global Partnership for Financial Inclusion, "G20 Digital Identity Onboarding," World Bank, 2018, www.gpfi.org/sites/gpfi/files/documents/G20_Digital_Identity_Onboarding.pdf.

8 Global Partnership for Financial Inclusion.

9 Michael Kende, Rory Macmillan and Yiannis Theodorou, "Regulatory and policy trends impacting Digital Identity and the role of mobile: Considerations for emerging markets," GSMA, October 2016, www.gsma.com/mobilefordevelopment/wp-content/uploads/2016/10/Regulatory-and-policy-trends-impacting-Digital-Identity-and-the-role-of-mobile.pdf.

Note: Foundational identifications are primarily created to provide general identification and credentials to the population for public administration purposes as well as to access public and private goods and services. Functional identifications are generated for specific services or transactions such as tax administration, social programs and tax administration.

10 The latter explains the case of Jamaica, where there exist well-established functional identifications.

Over the past decade, there has been marked growth in the number of governments who have introduced new, or improved existing, national identification programmes.

increased efficiency of government and private services in areas such as social inclusion, financial inclusion, and health. Such developments have been most dramatic in Southeast Asia, where biometric-based digital IDs have reached most of the adult population, for example in Pakistan, India, Thailand, and Indonesia. With those countries having gone this route, the global identity gap has been halved.[11] Much of the remainder of the gap is found on the continent of Africa, where 41 percent of the population lacks official proof of identification. As such, growth in the aforementioned areas has been lagging.[12]

The success of these national identification systems has been attributed to the privacy, security, and widespread use of the IDs. In Estonia and Finland, full coverage of national digital IDs has almost been achieved. These eIDs are based on a centrally managed data distribution platform, known as X-Road, public key infrastructure (PKI,) and other technologies for the uniqueness and security of credentials. Because digital IDs enable users to engage in electronic transactions, a PKI is crucial as it manages the security of sensitive information that is being transmitted from one user to the next. These countries have also taken advantage of high mobile phone penetration rates by incorporating the use of eIDs for mobile-based services,

India's digital surge, underway since 2017, has provided national IDs to over

1.2 billion citizens

some of whom previously lacked any form of legal ID.

increasing the ease with which citizens engage in transactions.

National ID systems, in alignment with SDG 16.9, have been adopted in countries over the world to address the needs of citizens by increasing the efficiency and effectiveness of the delivery of public and private services.[13] For example, India's digital surge, underway since 2017, has provided national IDs to over 1.2 billion citizens, some of whom previously lacked any form of legal ID.[14] In leveraging this ID, India has incorporated the widespread use of mobile technology to expand access to over 300 e-government services.

Examples of deploying digital IDs to impact social inclusion are evident in

countries such as India and Pakistan. India's digital ID, the Aadhar, was linked to bank accounts, which increased the effectiveness of social protection programmes by reducing errors of inclusion and exclusion.[15] These errors, largely attributed to the presence of ghost and duplicate beneficiaries, plagued various social programmes and incurred costs to the government. This digital ID also allowed the government to replace price subsidies with direct benefit transfers. By doing this, subsidy programmes, such as the liquified petroleum gas subsidy that provides India's poor and rural households with clean cooking gas, were able to expand access to clean gas by 25 percent.[16]

Similarly, Pakistan's flagship national social protection programme, Benazir Income Support Programme, used the National Database and Registration Authority (NADRA) as the key component to enroll and verify beneficiaries. Using NADRA to deliver social welfare payments, Pakistan was able to provide direct cash transfers to women for the first time, resulting in an increase in expenditure on nutrition and children's education.[17] Currently, approximately 5.4 million beneficiaries receive cash transfers, and almost 93 percent of these payments are made using delivery channels driven by branchless banking.[18]

11 Africa and Asia have the largest population of persons undocumented, globally. So with Asian countries implementing the ID, it has cut the gap between persons who have ids and those who do not in half. World Bank, "The State of Identification Systems in Africa: Country Briefs," 2017, http://documents. worldbank.org/curated/en/298651503551191964/pdf/119065-WP-ID4D-country-profiles-report-final-PUBLIC.pdf.

12 World Bank Group, "Identification for Development: Africa Business Plan IDA 18 (FY 18-20)," 2017, http://documents.worldbank.org/curated/en/484791507732929415/Identification-for-Development-ID4D-Africa-business-plan-IDA-18-FY18-20.pdf.

13 Provide legal identity for all including birth registration. Sustainable Development Solutions Network, "Indicators and a Monitoring Framework: Launching a data revolution for Sustainable Development Goals," August 2012, https://indicators.report/targets/16-9/.

14 Widespread adoption of digital id to access digital and other services.

15 Aadhar Programme is India's unique and cardless identity system that utilizes iris scan and fingerprint to authenticate registrants and produces a random 12-digit number.

16 Neeraj Mittal, Anit Mukherjee, and Alan Gelb, "Fuel Subsidy Reform in Developing Countries: Direct Benefit Transfer of LPG Cooking Gas Subsidy in India," CGD Policy Paper. Washington, DC: Center for Global Development, www.cgdev.org/sites/default/files/fuel-subsidy-reform-developing-countries-india.pdf.

17 Iftikhar Malik and Lucian Pop, "Pakistan Policy Note 11: Consolidating Social Protection," World Bank, June 2013, http://documents.worldbank.org/curated/en/593471468145476615/pdf/795780BRI0SASE0Box0377381B00PUBLIC0.pdf.

18 World Bank Group, "Pakistan National Social Protection Program-for-Results," 2017, http://documents.worldbank.org/curated/en/111621489672698369/pdf/113568-FSA-PUBLIC-P158643-Pakikstan-National-Social-Protection-PforR-Technical-Assessment.pdf

Digital IDs can enable the creation of intermediate financial services to achieve broader financial inclusion. Nigeria launched potentially the largest financial inclusion scheme in Africa in 2013 by issuing a multi-functional digital ID card. In prioritizing persons previously unbanked and underserved by financial institutions, the national ID card can now be used to deposit funds, receive social benefits, save, or engage in transactions that require electronic payments.[19]

The Kenyan government took a more inclusive approach to financial access by capitalizing on the use of mobile technology. By mandating the use of national IDs for SIM card registration, Kenya was able to create intermediate financial products, one of which is mobile money.[20] The M-Pesa mobile money service in Kenya is a globally-recognized success story.[21] With only 20 percent of Kenyans being able to access any formal financial service, and mobile phone penetration rate on the rise, M-Pesa was introduced to target the poorest families. It is an electronic payment and value-storing system that converts cash into electronic money, and is accessible only through mobile phones. This has reshaped the landscape and livelihood of over twenty million Kenyans, especially those living in rural areas.[22]

The M-Pesa platform is 27 percent cheaper than post office services and 68 percent cheaper than sending money to rural recipients via bus services.[23] The main users of this platform are urban senders,

> Only 20% of Kenyans were able to access formal financial services. With the M-Pesa, a mobile money service in Kenya, the landscape and livelihood of over 20 million Kenyans, especially those in rural areas have been enhanced. These users can transfer and receive money easily, securely, and instantly.

who are mostly men, and rural recipients, who are mostly women.[24] These users are able to transfer and receive money easily, securely, and instantaneously. As users become more acquainted with the platform, they transfer smaller amounts of money at greater frequency. By breaking up transfers, urban senders remit more money and thereby increase the recipients' household income. Since the introduction of the M-Pesa platform, the income of rural recipients has increased by up to 30 percent.[25] At present, the platform is ubiquitously used to pay bills, transfer funds, and access formal bank services such as micro-finance loans.

Harnessing a universal, digital ID in the health sector can be transformative. Whether it is through the provision of universal healthcare, the creation of digital platforms that better allow citizens to receive medical services, or

the creation of unique medical records for patients, digital IDs can increase the quality of and access to healthcare services, such as during the Coronavirus 2019 (COVID-19) pandemic. Estonia and Thailand are among the countries which have utilized digital IDs to reshape the way citizens interact with the health sector.

The government of Thailand has used the national population registry as the baseline list of beneficiaries for its universal healthcare scheme. With a fully computerized population database, universal health coverage and social health protection schemes have covered all Thai citizens since 2002. Beneficiaries, with their unique national number generated from birth, were enrolled in various social health protection schemes, and so the database was able to identify those who did not have insurance. Those uninsured persons were then covered by

19 Alex Court, "Branding Nigeria: MasterCard-backed I.D. is also a debit card and a passport," CNN Marketplace Africa, September 25, 2014, https://newsroom.mastercard.com/mea/press-releases/mastercard-branded-national-eid-card-launched-nigeria/.

20 In 2019, the Kenyan National Integrated Identification System, although one of the more developed ID systems in East Africa, had been legally challenged on grounds of unconstitutionality. This is further explained in the appendix.

21 "M" is for mobile and "Pesa" is for money in Kiswahili.

22 Olga Morawczynski and Mark Pickens, "Poor People Using Mobile Financial Services: Observations on Customer Usage and Impact from M-PESA," CGAP, August 2009, www.cgap.org/sites/default/files/CGAP-Brief-Poor-People-Using-Mobile-Financial-Services-Observations-on-Customer-Usage-and-Impact-from-M-PESA-Aug-2009.pdf.

23 Morawczynski and Pickens.

24 Morawczynski and Pickens.

25 Morawczynski and Pickens.

In Estonia **TELEMEDICINE SERVICES** reduced the number of in-person hospital visits by **40%**

the universal health insurance that was introduced in 2002. Thailand has since issued health smart cards to reduce fraud, and further buttress the effectiveness of the system.[26]

In Estonia, using the national ID number as a unique patient identifier has increased the efficiency and accuracy of health data; in addition, digitizing identities has made it easier to leverage electronic health (eHealth) platforms. Estonia has leveraged electronic health platforms that citizens can use to access their health records without visiting a doctor's office, reducing health-related transaction costs and increasing citizen convenience.[27] This also enables the transferability of care, regardless of physical location. Electronic prescriptions (ePrescriptions) and electronic ambulance services have also emerged. EPrescriptions have increased citizens' accessibility because they can be retrieved online and are fillable at any pharmacy that has been contracted by the government, nationally, and among European Union member states.[28]

These efforts have become more relevant since the COVID-19 pandemic and health crisis. As the world leader in ePrescription and electronic ambulance services, Estonia was able to rapidly respond and launch new digital solutions on the existing eHealth platform.[29] Because Estonians also have access to their health history on the e-health platform, introducing telemedicine during the pandemic was simpler and achieved widespread adoption. Telemedicine services reduced the number of in-person hospital visits by 40 percent.[30] Other solutions, such as the Koroonatest and the TEHIK, allow citizens to evaluate their risk of contracting the virus and, where necessary, temporarily request a letter of sick leave, without physically visiting a doctor, respectively. The most salient feature of the Koroonatest, however, is the real time transfer of data to Estonia's Health Board to assess and predict the development of the virus.[31] By illustrating the ability of public health systems to efficiently communicate and

share data. Estonia is swiftly gaining recognition as one of the most digitally advanced societies in the world.

Across the world, achieving inclusive development requires a sustained effort to reduce the lack of access to official identification. Implementing and leveraging a digital, robust, inclusive, and secure national identification system is relevant to this process. Incorporating digital technologies can strengthen existing legal identification systems currently being used to access social, financial, and health services. To this end, governments have leveraged eIDs to increase the efficiency of enrolment in and delivery of social programmes, create intermediate financial services, bolster the process of financial and social inclusion, and improve the quality of healthcare systems, whether through universal healthcare schemes or electronic health platforms. These health platforms were then able to rapidly respond in times of crisis, such as the COVID-19 pandemic.

26 International Labour Office, "Building Social Protection Brief: A national health insurance beneficiary registry based on national identification numbers," September 2015, www.usp2030.org/gimi/RessourcePDF.action?ressource.ressourceId=53144.

27 Closer to home, Latin American countries, like Uruguay, have allowed citizens to access health records," Salud UY, "Plataforma HCEN," January 8, 2018, www.youtube.com/watch?v=IXP0FlzU69M.

28 World Bank, "The Role of Digital Identification for Healthcare: The Emerging Use Cases," Washington, DC: World Bank License: Creative Commons Attribution 3.0 IGO (CC BY 3.0 IGO), 2018, http://documents.worldbank.org/curated/en/595741519657604541/The-Role-of-Digital-Identification-for-Healthcare-The-Emerging-Use-Cases.pdf.

29 Tanel Saarmann, "How Estonia's eHealth sector reacted to Covid-19: health startups raising investment, doctors making another decisive move towards digital," Ärileht, May 2020, https://investinestonia.com/covid-19-e-health/.

30 Saarmann.

31 Amanda Haynes, "E-Health in Times of Crisis: How Estonia is using technology to combat Covid-19", May 2020, https://e-estonia.com/e-health-technology-to-combat-covid-19/

3 The Cost of Not Having a National ID in Jamaica

In order to obtain any form of identification in Jamaica, a birth certificate is needed. The enrolment rate for birth certificates is high:

96%

The percentage of Jamaica's general population with birth certificates.

15%

Percentage of individuals registered with the Jamaica Council for Persons with Disabilities who have birth certificates.

Having identity documents simplifies the interaction between citizens and service providers, whether public or private, by easing the burden of proving one's identity required for each transaction. Jamaica does not presently have an identification that serves as a general-purpose identification, usable across all activities. Such IDs, known as foundational IDs, are usually created with the general population in mind, rather than a specific group of citizens. It is the norm in many jurisdictions that such IDs are universally available and are used for multiple purposes.

In Jamaica there is no foundational ID; instead functional IDs, such as passport, electoral ID, and driver's licence, together with the TRN, are used to authenticate citizens' identity. Those means of identification were not intended to verify identities in other contexts, or by third parties, but rather to meet the objectives of the issuing entities. These current ID systems are not only limited in their coverage and, for some, costly to obtain, but there is a lack of interconnectivity; that

> **Even for persons who have IDs, Know-Your-Customer (KYC) requirements and Justice of the Peace (JP) certifications are additional bottlenecks.**

is, each system's collection, processing, storage, and management of identity data is isolated from each of the others.

The lack of a universally acceptable identification has hindered Jamaica and Jamaicans in several ways. More than 180,000 Jamaicans lack any form of identification at all, and so have no access to social programmes, remittance services, and formal banking services. Some of these persons who lack such access are among Jamaica's most vulnerable populations, such as the

homeless, mentally challenged, disabled, poor women, and the elderly; those from rural areas are even more adversely affected. Furthermore, even for persons who have IDs, Know-Your-Customer (KYC) requirements and Justice of the Peace (JP) certifications are additional bottlenecks. As a result, engaging in basic services, such as bill payments, is more costly than it ought to be for these persons.

Existing Forms of Identification

In order to obtain any form of identification in Jamaica, a birth certificate is needed. The enrolment rate for birth certificates is high: approximately 96 percent of the population is issued with one. However, only 15 percent of individuals registered with the Jamaica Council for Persons with Disabilities have birth certificates.[32] Like the birth certificate, 96 percent of Jamaicans have a taxpayer registration number (TRN.) To interact with the government, banks, schools, and other institutions, a TRN is required. The TRN

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32 Anika Richards, "Disabled and Disconnected," *Observer*, October 25, 2015, www.jamaicaobserver.com/news/Disabled-and-disconnected_19234488.

The TRN is not just a personal ID number unique only to Jamaicans. It identifies any potentially tax-liable entity, and so is issued to businesses and some resident non-Jamaicans.

25%
of the adult population have a valid driver's licence

43%
have a valid electoral ID

56%
have valid passports

is needed also for the issuance of a driver's licence. Although the TRN is used as a supporting document when using other functional IDs, such as the passport or electoral ID, it is not just a personal ID number unique only to Jamaicans. It identifies any potentially tax-liable entity, and so is issued to businesses and some resident non-Jamaicans.

The coverage gained from the current IDs is restricted due to the functional specificity of each ID.[33] Currently, only 25 percent of the adult population has a valid driver's licence, 43 percent have a valid electoral ID, and 56 percent have valid passports.[34] None of these are necessary for a citizen to obtain except for the specific activities associated with each. Thus, many people are excluded from having any identification, particularly those in vulnerable groups.

There are logistical and bureaucratic barriers to accessing existing forms of ID in Jamaica. Where the electoral ID is presently the de facto national identification card, there are many barriers to obtaining one. By law, any individual registering to vote must have an address, and failure to verify residence will result in an incomplete registration process.[35] The ID can take some six months to be issued, because it is dependent on the date the applicant's name is published on the voter's list. This publication occurs only twice each year, in May and November. The driver's licence is specifically to operate motor vehicles, and is only attainable with a provisional driver's licence, issuable from age seventeen, and requires a certificate of competence.[36] This process can take, on average, two months to be completed.[37] Regarding the passport, there are various processing times which are dependent on the applicant's location. The Kingston office is the only office that allows same day or three-day passport services.

Therefore, applications submitted outside of this office will have to wait a longer period, whether for regular or expedited services.[38]

Inaccessibility of Current Means of Identification

Another constraint is the accessibility of offices where one can obtain an ID. Persons living in rural areas are underserved by the lone organization responsible for registering vital life events, the Registrar General's Department (RGD.) The RGD is the sole repository of birth, death, marriage, and fetal death records. The RGD has ten offices island wide, leaving four parishes not serviced, and limited coverage in rural areas. Even with a mobile unit, coverage is still restricted. There is one civil registry office per 270,000 inhabitants, a proportion significantly above the average for other

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33 The physical infrastructure refers to Passport, Immigration and Citizenship Agency (PICA,) Tax Administration of Jamaica (TAJ,) the Registrar General's Department (RGD,) and Motor Vehicle Examination Depots.

34 Because the government has allowed the usage of electoral IDs that have expired in 2017 to be extended to December 2020, this does not reflect the number of valid electoral IDs. Electoral Commission of Jamaica, "ECJ Extends Validity of Voter ID Cards," October 10, 2017, https://ecj.com.jm/ecj-extends-validity-voter-id-cards/; This is equivalent to approximately 681,600 active driver's license, 1,172,000 valid voter's ID and 1,580,00 valid passports. Source: CAPRI survey, 2019.

35 The law requires that registration takes into account the place where one is "normally resident." This means the place where one calls home and it can be proven that one lives there. Persons of "unsound mind" are excluded from voting as well because of their medical condition. EOJ, personal interview, December 4, 2019.

36 This is issued by the Island Traffic Authority. Tax Administration of Jamaica, undated, www.jamaicatax.gov.jm/.

37 The process includes learning to drive, applying for the provisional license (includes finding a Justice of the Peace for certification,) paying for the test, registering at a depot in order to receive a test date, receiving the certificate of competence upon passing the test ,and visiting TAJ to receive the license, which takes at least a week after passing the test. Tax Administration of Jamaica, undated, www.jamaicatax.gov.jm/.

38 The Jamaican passport identifies citizens for international travel and has a longer waiting time for applications submitted outside the Kingston office. Passport, Immigration, and Citizenship Agency, www.pica.gov.jm/passport-servies/general-passport-information/passport-fees/.

countries in the region.[39] With no mobile registration units and limited coverage in the rural areas, registration for an ID becomes even more onerous. Moreover, there are only twelve passport offices, thirty-one tax administration offices, and thirteen Motor Vehicle Depots island wide. In December 2019, PICA launched an online passport renewal portal to provide greater convenience, especially for persons living in rural areas.[40] The undocumented population living in rural areas remains underserved.

The passport is the only ID that someone under the age of seventeen can obtain. In Jamaica, youths become economically marginalized from as early as fourteen years old, and universal school enrollment goes up to age sixteen.[41] To access employment an individual must present a valid form of identification. The cost of a passport likely makes it inaccessible by those youth who would need it most, the under-seventeen youth who are not in school, and who are at risk of becoming unattached youths.

Most unattached youths are high school dropouts, and many end up in conflict with the law.[42] Training and other initiatives targeting this age group require, at the very least, a TRN, which parents or guardians have to request on behalf of the minor.[43] As such, youths who are at risk of becoming unattached are unlikely to

There are only

12

passport offices,

31

tax administration offices, and

13

motor vehicle depots island wide

have a TRN, given the low likelihood of a prospective unattached youth having a parent or guardian who would have taken that initiative. This makes the process of enrolment in vocational and other training programmes difficult for these youths, who are among those who need these opportunities the most.

Direct Costs of Current Means of Identification

There are direct costs for obtaining some of these identifications, costs that affect their accessibility, and thus their

coverage. Although the original of the birth certificate is free, a replacement, in the event of loss or damage, can be costly. At minimum, it costs J$2,500 (US$17) per replacement (and more for a faster delivery time.)[44] The total cost for a driver's licence is at least J$10,440 (US$72.) This is disaggregated by the cost of the provisional licence, J$1,800, the cost for the driving test, J$3,240 and, if successful, J$5,400 for the private motor vehicle licence. (Not calculated here is the cost of driving lessons, and the need for access to a motor vehicle to take the test in.) The passport is cheaper to obtain than the driver's licence. For regular (new) passport services, adult applicants pay J$6,500 and minors J$4,000, regardless of location. For expedited services, it costs as much as J$16,500 for adults and J$9,000 for minors.

Indirect Costs of Obtaining an ID

Outside of the direct costs to obtain a driver's licence or a passport, individuals seeking to apply for either of these functional IDs will incur the cost and effort of obtaining a Justice of the Peace's (JP) certification.[45] In fact, the integrity of the Jamaican passport service relies heavily on JPs who ensure that the identity of the applicant is correct.[46] Within the

39 The average of 11 Caribbean countries is one civil registry office per 65,700 inhabitants. Elton Bollers et al, "Country Infrastructure Briefs: Caribbean Region," Inter-American Development Bank, April 2019, http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=EZSHARE-394037482-38.

40 Additionally, persons in possession of the old non-machine-readable passport issued before September 2001 are ineligible to renew their documents online. https://jis.gov.jm/adults-can-now-renew-passports-online/

41 Planning and Project Development Division, "Unattached Youth In Jamaica," The HEART Trust-National Training Agency, February 2009, www.mona.uwi.edu/cop/sites/default/files/Unattached%20youth_0.pdf

42 "PM Holness Determined to Decrease Unattached Youth Numbers," Office of the Prime Minister Communications, October 30, 2019, https://opm.gov.jm/news/pm-holness-determined-to-decrease-unattached-youth-numbers/.

43 School identification expires after graduating from the school. Institutions, such as HEART Trust NTA, that are dedicated to targeting youths at this age, require a TRN for enrolment. Obtaining TRN numbers for minors requires the consent of a parent/guardian. This makes the process of enrolment harder for youths because some of them are unsupervised or neglected by their parent/guardian. In other cases, the parent/guardian does not have identification documents, including a TRN, which are needed to sign the authorization form.

44 Registrar General Department, March 22, 2020, https://rgd.gov.jm/index.php/products-and-service/prices.

45 A Justice of the Peace is a judicial public officer, with limited powers, authorized to promote and protect the rights of residents within a particular community. Justices of the Peace are not the only persons who can certify documents, but they are the most used and are not allowed to charge for their services.

46 The Editorial, "JP's Urged to Be Vigilant When Certifying Passport Documents," *Gleaner*, January 31, 2020, http://jamaica-gleaner.com/article/news/20200131/jps-urged-be-vigilant-when-certifying-passport-documents.

last year, at least 25 percent of Jamaicans needed JP services at least once.[47]

Though JPs do not charge for their services, to access a JP incurs time and transportation costs. These costs can be considerable, especially for those on low incomes. To quantify the average cost of getting to a JP, we calculate the average time it takes persons to travel to a JP along with the associated transportation cost. On average, it takes 10 minutes to travel to a JP and costs J$100 for transportation. Costing the average time for travel (potential productivity) and the transportation cost, the indirect cost of a JP's certification is J$1,850.[48]

Nearly 5 percent of the adult population is unable to locate a JP; a fifth of these persons have a desire to open bank accounts.[49] Thus this barrier is related to another detrimental outcome of lacking a universal national identification system: financial exclusion.

Lack of ID as a Barrier to Financial Inclusion

Financial inclusion, typically defined as the number of individuals that can access and use financial services, has been a challenge in Jamaica due to a lack of a foundational identification system.[50] One in five Jamaican adults is unbanked.[51] Some 13 percent of the unbanked attribute this to a lack of legal identification. Moreover, this contributes to the society's gender disparity since women are less likely to have a bank account due to lack of identification.[52] Additionally, with low levels of urbanization, rural areas tend to be more susceptible to limited access to both identification and financial services.[53]

Being unbanked increases the costs of interacting with the formal banking system. One example is having to encash, rather than deposit, a cheque. On average, it costs unbanked individuals J$318 per encashment. Some of these persons are from low-income and low-middle income households, and earn minimum wage; J$318 is almost twice the hourly minimum wage of J$175.

Financial exclusion is disproportionately experienced by people in rural areas. Approximately 67 percent of persons who do not have TRNs live in rural districts.[54] A TRN is essential for opening a bank account. About half of the persons hindered from acquiring bank accounts, because of no ID, are rural residents. Moreover, for the almost half of Jamaica's population that resides in rural areas, access to services and resources is usually constrained. For example, the physical availability of financial services for these households is limited, which constrains efforts to improve their livelihood.[55] As such, the occurrence of poverty among persons in vulnerable groups is usually highest in rural Jamaica.

Further, to satisfy Know-Your-Customer

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47 This is equivalent to 505,195 citizens. CAPRI survey (2019).

48 Average cost of JP's certification = [(average travel time * value of time) + average cost of travel] * average number of times JP's certification is needed. For value of time the minimum wage of J$175 per hour was used. CAPRI survey (2019).

49 CAPRI survey.

50 A cross country survey, involving over seventy thousand unbanked individuals, found that other barriers of financial inclusion include lack of financial resources (30 percent), high costs of opening and maintaining a bank account (23 percent), lack of accessibility of service providers (20 percent), lack of trust in financial institutions (13 percent) and religious reasons (5 percent). Henry Mooney, "Jamaica: Financial Development, Access, and Inclusion: Constraints and Options," Inter-American Development Bank, November 2018, https://publications.iadb.org/publications/english/document/Jamaica_Financial_Development_Access_and_Inclusion_Constraints_and_Options.pdf

51 CAPRI survey.

52 Fifty-five percent of persons that are unbanked, as a result of no ID, are women. CAPRI survey.

53 Mooney, Ibid.

54 CAPRI survey.

55 Bank of Jamaica, "National Financial Inclusion Strategy: Access for All, 2016-2020," March 2017, http://boj.org.jm/pdf/Jamaica_NFIS_Final_Draft.pdf.

(KYC) requirements, banks have levied additional documentation requirements, worsening access to financial services. KYC requirements are procedures which require financial institutions to have a clear grasp on the identity and activities of each of their customers. Other pertinent information includes proof of current address, financial history, and employment history. Such requirements make the process onerous, especially for those operating outside the formal sector; a good proportion of these persons make up the low income, poorly educated segments of the population.[56] In fact, there is a negative correlation between the percentage of persons employed in the informal sector and the percentage having an account at a financial institution.[57]

The success of the government's efforts to pay social welfare recipients by direct benefit transfers has been limited by most recipients not having bank accounts. In 2006, GOJ introduced direct benefit transfers to PATH beneficiaries using Keycard cash accounts. These cards

only allow them to make payments with authorized dealers and receive transfers, not to make bank deposits. Even with this restriction on the account, PATH beneficiaries are still subject to KYC requirements. This is because the application of KYC requirements in Jamaica is equally distributed across financial services, regardless of the nature or value of the transactions. Currently, only 17 percent of beneficiaries utilize the direct deposit option. Therefore, PATH recipients that still receive cheques do not benefit from the convenience of receiving payments directly in their bank accounts. In August 2019, beneficiaries receiving cheques from post offices were disadvantaged because of a delay in payments.[58]

To cushion the economic effects of the COVID-19 pandemic, the GOJ created the COVID-19 Allocation of Resources for Employees (CARE) Programme that targets the unemployed and those in informal employment. Like the PATH programme, the efficacy of the CARE programme is dependent on reaching

its intended targets, and doing so efficiently and safely. With one in five Jamaicans unbanked, accomplishing this has been difficult. More than 150,000 applicants requested to collect their grant in person, forcing the GOJ to pause those applications due to the logistical and health challenges that needed to be resolved to make the collection process congruent with the new social distancing protocols.[59] Had more citizens been banked, and part of a common identification platform, the CARE programme payouts could have been directly disbursed. Far less fortunate, are the neediest citizens who are blocked from benefitting from any grant at all due to lack of identification.

The disenfranchisement that arises from the lack of identification also hinders the receipt of remittances. Remittances are important for low income and lower-middle income Jamaicans, 40 percent of whom are typically unemployed.[60] Approximately 55 percent of Jamaicans who require remittance services depend on the remittances for survival, and

56 More than 80 percent of males and more than 75 percent of females in informal employment had no passes in external examinations. International Labour Organization, "Informal Employment In Jamaica," 2014, www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/documents/publication/wcms_245888.pdf.

57 Alan Gelb and Diego Castrillon, "Identifying and Verifying Customers: When are KYC Requirements Likely to Become Constraints on Financial Inclusion?" CGD Working Paper 522, Center for Global Development, Washington, DC, 2019, www.cgdev.org/sites/default/files/identifying-and-verifying-customers-when-are-kyc-requirements-likely-become-constraints.pdf.

58 Ministry of Labour and Social Security, "Delay in Payment to PATH Beneficiaries," Jamaica Information Service, August 15, 2019, https://jis.gov.jm/delay-in-payment-to-path-beneficiaries/.

59 Jamaica Observer, "CARE officials give reason for closure of compassionate grant", April 17, 2020, www.jamaicaobserver.com/latestnews/CARE_officials_give_reasons_for_closure_of_compassionate_grant?profile=1228

60 Eliud George Ramocan, "Remittances to Jamaica: Findings from a National Survey of Remittance Recipients," Bank of Jamaica, 2011, http://boj.org.jm/uploads/pdf/papers_pamphlets/papers_pamphlets_Remittances_to_Jamaica_-_Findings_from_a_National_Survey_of_Remittance_Recipients.pdf.

share the proceeds with two or more persons.[61] The remittances received are usually mostly spent on utilities and food, necessities.[62] Not being able to access this service, therefore, not only impacts the recipient, but also their dependents. Using the total value of remittances and the total number of transfers received for the period January 2019 to September 2019, we calculated the average amount of remittances received. Because of no identification, these persons forgo an income of US$206, per remittance transaction.[63] Therefore, this forgone income results in forgone household welfare. To circumvent this, some people receive payments in other persons' names, increasing their vulnerability to theft and dishonesty.

Without access to formal financial services, financially vulnerable people pay more for basic services, such as bill payments.[64] Most formal banking services and multi-transaction agencies, such as Paymaster and Bill Express, have deployed online platforms to facilitate ease of bill payments and at a cheaper cost. Payments can be made using digital payment instruments such as debit and credit cards, or mobile payments. To access either of these payment methods, KYC conditions must be satisfied, which necessitates having a valid form of identification, among other requirements. This leaves those persons without these payment methods to utilize traditional means which are more costly and time consuming. At least 60 percent of Jamaicans pay utility bills such as light, water, internet, and cable. Approximately 6.4 percent of bill payments are done online and 4.4 percent by telephone.[65] The bulk of payments are therefore made in person.

As is the case with JP certifications, in-person transactions are costly. On average, it takes approximately 18 minutes for traveling and 21 minutes to complete a regular bill payment transaction. Therefore, the unbanked and underbanked typically lose J$6,825 in potential productivity each time they use traditional means to pay bills.[66] Outside of productivity time lost, persons also incur a standard fee per transaction at multi-transaction agencies. For example, Paymaster and Bill Express charge J$55 per in-person bill payment; payment online is either free or less costly. The time and cost savings to be had by eliminating the need for payments to be made in person are therefore considerable.

Lack of digital ID as a barrier to digitization

Irrespective of the increase in computer usage and the availability of digital technologies, Jamaicans are still not able

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61 Ramocan, ibid.

62 Ramocan.

63 Value of remittances from year-to-end September 2019 = US$1,484,360,000, Number of Transfers = 7,197,100. Average per transaction = US$206. Bank of Jamaica, email correspondence, January 9, 2020.

64 The financially vulnerable refers to those who are unbanked and underbanked. Although about 70 percent of Jamaicans are banked, account usage remains very low. The usage of digital payments, including card, mobile, and internet-based, is low. Bank of Jamaica (2017), ibid.

65 CAPRI survey.

66 Average cost of transaction = [(average travel time + average time to complete transaction)* value of time]. Value of time is hourly minimum wage, J$175.

to thoroughly harness the benefits of these transformations without a secure digital identification.[67] As such, citizens possessing any form of identification are disadvantaged by its limited ability to be used in the digital sphere. For example, in the absence of e-government services, government-to-citizen interactions have been more costly for Jamaicans than other Caribbean countries, such as Trinidad and the Bahamas.[68] On average, 4.1 hours of potential productivity is lost from engaging in a single transaction in Jamaica, as opposed to 3.9 hours and 2.8 hours in Trinidad and the Bahamas, respectively. Contributing to this is the fact that 45 percent of transactions, ranging from civil registration to real estate, take at least three interactions with government offices, the highest among Latin America and Caribbean countries studied.[69]

Lack of Interoperability

The lack of interoperability—the ability of one means of identification to correspond to another—impairs the reliability of Jamaica's currently available identity documents. This diminishes the advantage of having an identification. The government collects, stores, and manages citizens' data in digital and analog silos, making it difficult for themselves and businesses to get holistic and consistent information about citizens and potential clients. The information collected by the EOJ, for example, is not cross-checked against any other database; instead, it is sufficient for the EOJ to confirm that a fingerprint is not a duplicate of an existing

one stored within the electoral database for the registration to be successful.[70] This can enable persons to have a different identity in other databases.

For the TAJ and PICA information systems, some level of cross referencing is conducted with the RGD's database. However, there are inconsistencies even within the RGD database as the vital life events of an individual, such as birth and death, are not linked to each other.[71] This lack of interoperability has facilitated the production of fraudulent documents. On average, 119 fraudulent birth certificates have been confiscated from persons at RGD offices, per year.[72] (See table 1.)

The inability of functional ID systems

to crossmatch and share relevant information constitutes a low level of assurance for both the government and the private sector when engaging in business transactions. With different service providers requiring different sets of documents, it becomes laborious for citizens to constantly assemble documents. Likewise, special care has to be taken to safekeep delicate paper documents; loss or destruction of these important papers will attract financial and time and productivity costs.

Vulnerability to Fraud

The forging of identity documents does happen. The TRN, which is the

Table 1. Fraudulent certificates confiscated from customers at the RGD

Year	No. of Fraudulent Certificates
2010	172
2011	154
2012	122
2013	117
2014	110
2015	126
2016	97
2017	89
2018	85

Source: *Office of the Prime Minister*

67 Lloyd Waller, "Jamaica needs to accelerate digital transformation," *Observer,* July 15, 2020, www.jamaicaobserver.com/opinion/jamaica-needs-to-accelerate-digital-transformation_198512

68 Benjamin Roseth and Angela Reyes, "Wait no More: Citizens, Red Tape, and Digital Government Caribbean Edition," Inter-American Development Bank, 2019, https://publications.iadb.org/publications/english/document/Wait_No_More_Citizens_Red_Tape_and_Digital_Government_Caribbean_Edition.pdf.

69 Roseth and Reyes.

70 Glasspole Brown, Director of Elections, personal interview, December 19, 2019.

71 TAJ, undated, www.jamaicatax.gov.jm/.

72 A total of 1,072 fraudulent birth certificates over a nine-year period. Office of the Prime Minister (OPM), email correspondence, October 3, 2019.

most widely used identity document, is subject to forgery.[73] Approximately 95 percent of the total illustrated in table 2 represents identity theft by use of forged TRNs. There have also been suspicions of duplicate TRNs in the TAJ database.[74] Because TRNs have become the unique identifier for a driver's licence, it is therefore likely that fraudulent driver's licences exist. In 2017 and 2019, more than 300 cases of fraudulent passports were uncovered, which is not atypical (see table 3). With the introduction of face recognition technology at PICA, in 2016, forging passports has become more difficult.

Table 2*. Reported cases of fraudulent TRNs*

Year	No. of Reports
2019	7
2018	16
2017	22
2016	20
2015	36
2014	52
Total	**153**

Source*: Office of the Prime Minister*

Table 3*. Passport forgeries, 2009 - 2019.*

Year	Before Forgery Act	Conspiracy to Deceive	Unlawful Possession	Total
2009	207	14	7	228
2010	258	9	2	269
2011	202	33	0	235
2012	140	8	0	148
2013	126	20	0	146
2014	127	32	0	159
2015	129	27	0	156
2016	201	14	0	215
2017	328	6	0	334
2018	284	8	0	292
2019	310	7	0	317
Grand Total				**2,499**

Source*: Office of the Prime Minister*

The use of biometric identifiers, where systems are not interconnected, does not guarantee increased trustworthiness of

73 OPM (2019).

74 Approximately 29,123 numbers have been retired in data cleaning processes, as there were suspicions of duplications. Inter-American Development Bank (Jamaica office,) email correspondence, October 3, 2019.

IDs. For example, the EOJ has instituted, as a part of enumeration, the collection of biometrics. The use of biometrics ensures that an individual is on the voter's list only once, reinforcing their "one man, one vote" mandate.[75] This, however, does not guarantee that an individual is who they say they are. Moreover, the acquisition of the electoral ID does not require the provision of any supporting identity document.[76] Therefore, outside of the EOJ's system, it is possible for them to assume another identity.

Leveraging an Identification System

With these costs, constraints, and disadvantages in mind, the need for a national identification system is evident. Such a system, first, would address the problem of inadequate means of identification by providing a reliable and trustworthy ID. Second, it can be leveraged to introduce more affordable and convenient financial services that target the more marginalized in the population. Third, social welfare programmes that leverage the ID can be delivered more efficaciously.

The main purpose of the national identification is to identify and authenticate citizens and residents, digitally and physically. This reduces the need for persons to acquire special-purpose IDs when they need an identification; instead, it emphasizes the right of every citizen to be legally identifiable in a secure and efficient way. This will allow persons to access social services, financial services, and other services that are crucial to their welfare, from which they were not able to benefit

without an ID. Also, there is no age limit to obtaining a national identification number (NIN) because this number can be offered at birth. Youths, therefore, will have a number to use any time they need it, including to take advantage of youth-specific programmes, interventions, and initiatives.

With this secure and reliable ID, service providers should be incentivized to create financial services that citizens, including the marginalized, can access and benefit from. These services include, but are not restricted to, mobile money or money cards that do not necessarily require a bank account to access. Alliance Payment Services and Mailpac are two examples of private businesses that offer money cards that do not require a bank account. There are several other initiatives in Jamaica, such as GraceKennedy's MPay, and National Commercial Bank's Quisk, that have introduced a mobile money

platform. However, they have thus far not been widely adopted. Only approximately 1 percent of adults use mobile money wallets in Jamaica, notwithstanding the greater accessibility and convenience they purportedly offer.[77]

The poor take-up of such intermediate financial products is attributed to the inability of many potential customers to satisfy KYC requirements. Implementing a robust NIDS is a crucial step in overcoming the KYC barrier. Because a national identification system provides the basis for customer identification and verification, it can facilitate compliance with KYC conditions for banks and mobile operators. Additionally, the value-added digital component allows NIDS to support secure non-face-to-face identity proofing and enrolment for customers, especially those in remote areas.[78] For example, India's biometric Aadhar system currently provides full e-KYC,

India's biometric Aadhar system currently provides full e-KYC, with essential customer details sourced directly from the central repository, rather than paper documents.

Approximately

340 million

accounts have been opened, boosting India's 2017 financial inclusion rate to

80%

75 The EOJ captures the ten fingerprints of the registrant. The fingerprints are used to authenticate voters using the Electronic Voter Identification and Ballot Issuing System (EVIBIS) on election day. TAJ, undated, www.jamaicatax.gov.jm/.

76 If an applicant is perceived to be less than eighteen years old, they must present a birth certificate. TAJ, www.jamaicatax.gov.jm/.

77 Bank of Jamaica (2017), ibid.

78 FATF, "Guidance on Digital Identity," FATF, Paris, www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/Guidance-on-Digital-Identity.pdf.

with essential customer details sourced directly from the central repository, rather than paper documents. Approximately 340 million accounts have been opened boosting India's 2017 financial inclusion rate to 80 percent and, simultaneously, narrowing the gender gap on inclusion.[79]

As a part of the Bank of Jamaica's Customer Due Diligence (CDD) requirement, customers need to submit proof of address. However, an address, although ostensibly an important customer detail for banks to have, is not a necessary condition for an effective KYC regime, based on the Anti-Money Laundering and Combating Finance of Terrorism (AML/CFT) Guidance notes. During the 1970s, proof of address was a useful way to prove identity, because in the absence of electronic databases, profiles of customers were stored via tin-stamp address-o-graph systems. As such, it was a relatively robust, unique identifier because the address was literally

cast in metal.[80] Also, in the absence of interoperable digital databases, the only way of cross verifying an identity was via their addresses because people's addresses were kept across multiple, independent institutions. For those without multiple independent relationships, they were not considered valuable enough to have a bank account.[81]

Coupled with the use of a national ID system to address KYC barriers, some Latin American and Sub-Saharan African countries have instituted tiered-KYC conditions to achieve broader financial inclusion. Tiered-KYC approaches seek to implement flexible account opening requirements suitable for different levels of income earners. These regulations have the capacity to enable financial inclusion without increasing the financial sector's vulnerability to criminality. So, the less information required to open the account, the more restrictions that are enforced. For example, poorer households wanting

to open bank accounts will be able to, but these accounts will have restrictions such as a cap on balances, or value of transactions, or channels to access or receive funds.[82] They also facilitate the introduction of new products, such as zero balance or simplified accounts, and promote the usage of existing products that are designed to suit the needs of the populace.[83] As a result of this, persons enrolled in social protection programmes will be able to access bank accounts and benefit from direct transfers.

If Jamaica had a national identification system that could then be leveraged to satisfy KYC requirements, recipients of social welfare would be able to take advantage of these benefits. For example, in 2016, the Ministry of Labour and Social Security took the initiative to explore the use of mobile money, based on a recommendation from CAPRI's 2016 report on "Mobile PATH Payments."[84] This scheme, aimed

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79 Gelb and Castrillon.

80 Gelb and Castrillon.

81 Proof of income and employment also has the potential to exclude members of the informal economy. Leveraging a national ID to facilitate KYC can help to promote financial inclusion. Gelb and Castrillon.

82 Xavier Faz, "Mexico's Tiered KYC: An Update on Market Response," CGAP, June 25, 2013, www.cgap.org/blog/mexicos-tiered-kyc-update-market-response.

83 There is a gap between the services offered in the formal banking sector and the needs of the citizens, especially low-income earners. Bank of Jamaica (2017), Ibid.

84 Avia Collinder, "PATH Opens Up for Mobile Money Market," *Gleaner*, November 21, 2018, http://jamaica-gleaner.com/article/business/20181121/path-

to promote financial inclusion, improve administrative efficiency, reduce costs, and ensure greater accessibility, including to its rural beneficiaries, seeks to introduce approximately 128,000 PATH beneficiaries into the "arena of electronic payments."[85] To date, the scheme has not been executed due to concerns from providers about the low level of take-up of mobile money services, partly due to the beneficiaries' inability to meet KYC conditions. Therefore, with the leveraging of a national ID system, more persons can potentially onboard this and other new payment schemes.

The lack of a national ID in Jamaica has proven to be costly, especially for the most vulnerable. These costs arise directly and indirectly, through logistical costs and a person's inability to access social programmes, formal banking services, and remittance services. The direct costs refer to the actual cost for the identifications whereas indirect costs refer to obtaining a JP's signature, on which the application for a passport, for example, heavily depends. Additionally, all the current identifications present logistical costs based on the timeframe and documents required to generate the ID. These costs, coupled by the inaccessibility of the means of identification which currently underserve youths under the age of seventeen, and persons living in rural areas, increase Jamaicans' inability to be socially and financially protected, especially during a pandemic crisis.

Furthermore, even with access to the current identifications, issues may arise as the lack of interoperability affects the veracity of the information presented. On average, between 2010 and 2018, the RGD has recorded 119 fraudulent birth certificates. PICA, in 2017 and 2019, recorded more than 300 forged passports. Similarly, the TAJ estimates that 95 percent of reported cases of fraudulent TRNs, between 2014 and 2019, represent identity theft. With a more robust identification system, these impairments would likely be reduced.
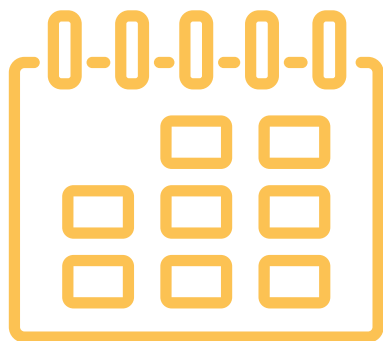
opens-mobile-money-market; CAPRI, "Mobile PATH Payments: Efficient Social Support through a National Mobile Money Ecosystem," June 2016, www.capricaribbean.org/documents/mobile-path-payments-efficient-social-support-through-national-mobile-money-ecosystem.
85 Collinder.

4 National ID Systems: The Jamaican Experience

The process towards a national identification system in Jamaica gained momentum beginning in **SEPTEMBER 2011,** and was scheduled to be completed in **OCTOBER 2015.**

Despite the benefits, some countries are lagging in harnessing the potential of national identification systems; Jamaica is one of these, though not for lack of effort. Jamaica does not have a national identification and registration system that can reliably verify the identity of its citizens, among other purposes. Discussions surrounding the implementation of a national registration system for Jamaica have been ongoing since the 1970s. Due to the diversity and lack of connectedness of the present identification systems, the attempt at introducing a national identification system should create a central database that facilitates interoperability.

A national identification system also sets the foundation for a digital society. Presently, none of the identification methods offer a digital component that would enable citizens to take advantage of electronic government (e-government)

services, such as signing of documents electronically, that are aimed at improving their overall experience when interacting with the government.[87]

The process towards a national identification system in Jamaica gained momentum beginning in September 2011, and was scheduled to be completed in October 2015.[88] A Memorandum of Understanding (MoU) was established in July 2012 between the Office of the Prime Minister (OPM) and Fiscal Services Limited (FSL,) to support the information and communications technology (ICT) consultancies.[89] By March 2014, eleven terms of references were developed and approved by the Inter-American Development Bank (IDB) for the recruitment of eleven consultants, and a NIDS policy was drafted. A cost-benefit analysis, external audit, and technical evaluation were also completed.[90] Although the legal framework and policy draft were not

signed off by the Parliament, this laid the groundwork for what was to be Jamaica's first national identification system.

The then-new Jamaica Labour Party (JLP) administration, upon taking office in early 2016, sought to bring the NIDS bill to completion, with a view to rolling out the system by January 2020. Tabled in September 2017 and passed in November of that year, the National Identification and Registration Act (NIR Act) was an attempt to introduce a digital national identity system to Jamaica, with a comprehensive legislative framework on which it could be established and regulated. (Existing legislation, such as that governing the RGD, EOJ, TAJ, PICA, and National Insurance Scheme (NIS,) addressed identity management only as it related to the specific functions of its parent agency.)

Subsuming the responsibilities of the RGD, the NIR Act, in its original conceptualization, would have established

87 Alecia Smith, "Jamaica Looking to Establish the First E-Government System - PM," Jamaica Information Service, June 11, 2017, https://jis.gov.jm/jamaica-looking-establish-regions-first-e-government-system-pm/.
88 Denzil Plummer, Coordinator of Jamaica's National Identification System, Personal Interview, April 1, 2020.
89 Athaliah Reynolds-Baker, "NIDS Project Gets $39 million," *Jamaica Information Service*, April 7, 2014, https://jis.gov.jm/nids-project-gets-39-million/.
90 Reynolds-Baker.

The National Identification and Registration Act (NIR Act) was an attempt to introduce a digital national ID system to Jamaica, with a comprehensive legislative framework on which it could be established and regulated.

a body called the National Identification and Registration Authority to create, maintain, and operate the database, which was to be called the National Civil and Identification Database. The Authority was also to have developed appropriate systems and protocols to safeguard the collecting, processing, use, and sharing of identity information. These safeguards would have been supported by the regulations of the act and by a Data Protection Act that, at the time, was yet to be approved by Parliament.

Notwithstanding the supposed benefits of the system, that effort was blocked by the opposition People's National Party (PNP,) members of the legal fraternity, and civil society organizations, ostensibly with the support of some portion of the general public.[91] A legal challenge was brought by the PNP General Secretary, on the basis of encroachment of eight of the 25 fundamental rights and freedoms of citizens.[92] In April 2019, the Supreme Court of Jamaica ruled that the National Identification and Registration Act, the legal basis for the system, was inconsistent and unconstitutional. Following the judgement, the administration advised that they would review the act, taking into consideration the points made by the panel of judges. The Government of Jamaica (GOJ) subsequently announced the introduction of a new bill before the close of the 2019/2020 financial
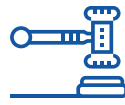
In April 2019, the
SUPREME COURT OF JAMAICA
ruled that the National Identification and Registration Act, the legal basis for the system, was
INCONSISTENT AND UNCONSTITUTIONAL

year. With the approval of the National Identification System (NIDS) Policy Paper on April 20, 2020, the drafting of a new bill was said to have been accelerated.[93] Up to August 2020, a new bill had not yet been presented to the cabinet for consideration, likely due, at least in part, to the Cabinet's business being subsumed by the COVID-19 pandemic.

The Legal Challenge to NIR Act

The NIR Act was declared to be inconsistent with the provisions of the constitution in April 2019 by the full panel of the Supreme Court of Jamaica, due to untenable legal unconstitutionalities.

Most of the dissenting views surrounded the legality of the Act, included the absence of the right to opt out of enrolling in a system that requires biometric information, sanctions for failure to register, and the lack of a Data Protection Bill, which is ordinarily a precursor to a NIR Act.[94] Justice David Batts expressed concerns about NIDS being tantamount to a "surveillance state," because of the wide ranging provisions for information sharing and authentication; this, he declared, intensified the relevance of a Data Protection Act.[95]

Constitutional rights are not absolute and can be limited by legislation once the limitation has been justified.[96] The panel found that because enrolment was involuntary, it impinged on guaranteed constitutional rights to privacy, liberty, security of the person, and equality before the law; the government did not provide sufficient justification for the violation. The breaches were made manifest in the mandatory enrolment of every registrable person: not enrolling would have resulted in denial of access to public and private services, and the imposition of criminal sanctions.[97] Furthermore, with no statistical evidence to substantiate the impingement, the case for implementing the Act was further weakened.

The panel also found that by compelling citizens to disclose sensitive information,

91 Kathy Barrett and Garth Rose, "Growing concerns over Jamaica's National ID System," Caribbean National Weekly, November 22, 2017, www.caribbeannationalweekly.com/caribbean-breaking-news-featured/growing-concerns-jamaican-national-id-system/.

92 Alphea Saunders, "Major Blow to NIDS," *Observer*, April 13, 2019, www.jamaicaobserver.com/front-page/major-blow-to-nids-pnp-says-court-ruling-against-id-system-a-victory-for-opposition-gov-t-reviewing-judgement_162133?profile=1373.

93 Chris Patterson, "Revised new bill to be considered by cabinet soon," *Jamaica Information Service*, April 30, 2020, https://jis.gov.jm/revised-nids-bill-to-be-considered-by-cabinet-soon/

94 Saunders.

95 Robinson, Julian v. Attorney General of Jamaica, 2018HCV01788, https://supremecourt.gov.jm/sites/default/files/judgments/Robinson%2C%20Julian%20v%20Attorney%20General%20of%20Jamaica.pdf.

96 The Oakes Test is a proportionality test used once a Charter Right has been violated; it measures justifiability of the violation. To establish that a limit is reasonable and demonstrably justified in a free and democratic society, three central criteria must be satisfied. In the case of NIDS: (1) Is the legislative objective of NIDS sufficiently important to justify limiting a fundamental right? (2) If so, does the provision of biometric information meet the legislative objective and are rationally connected to it and are not arbitrary, unfair or based on unreasonable considerations? (3) Are the means used to impair the right or freedom no more than is necessary to accomplish such objective? Kathryn Williams, "NIDS and the Constitution," Lival and Company, April 10, 2018, www.lival.co/index.php/news/posts-2/264-nids-the-constitution.

97 Registrable persons are citizens and persons who are ordinarily resident in Jamaica; that is, persons who are legally residing in the country for at least six months in the calendar year, immediately preceding the date of enrolment.
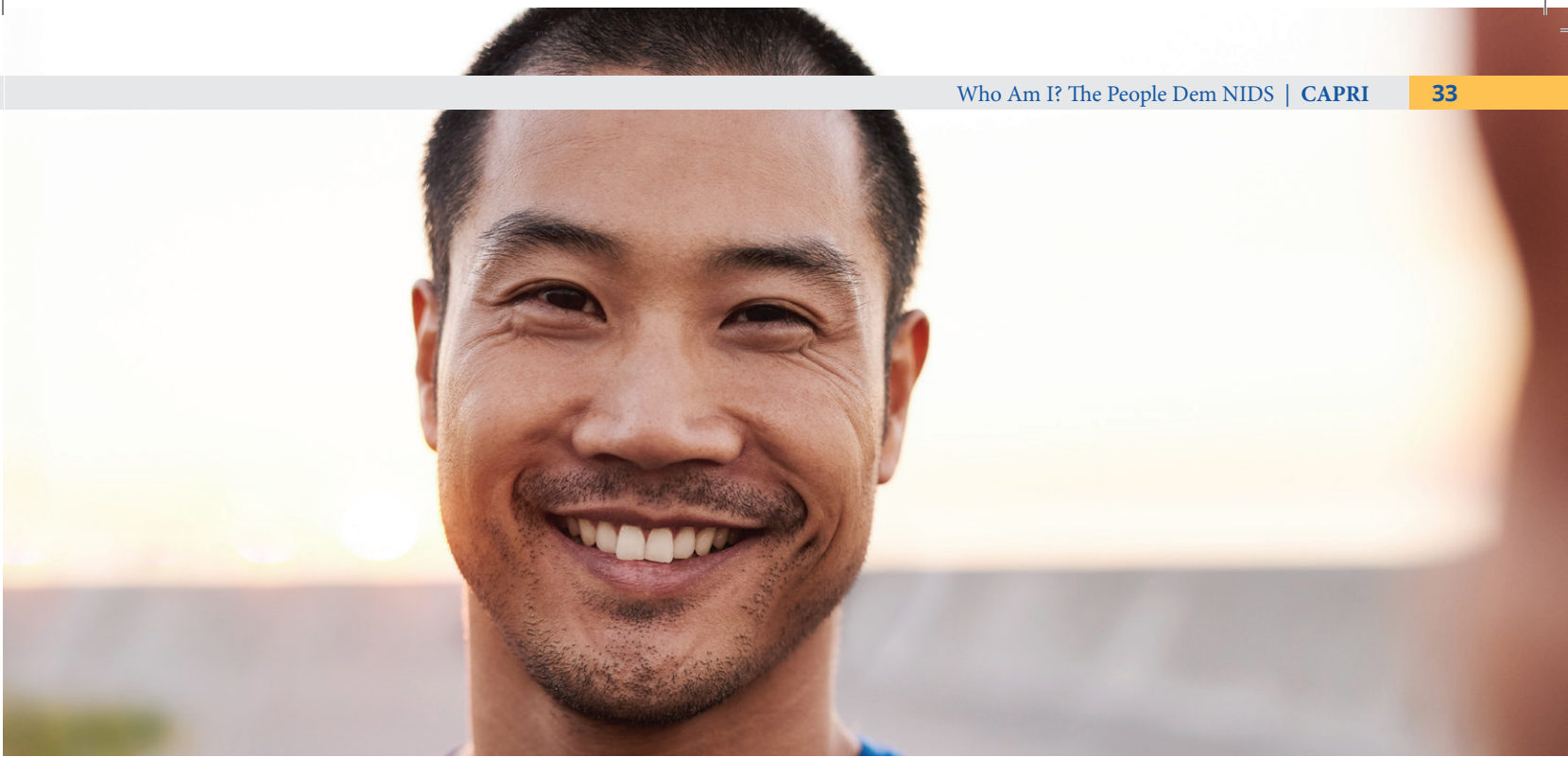
without plausible reason, violates the rights to privacy, liberty, and security of the person. The requirement to submit biometric data such as a photograph or facial image, fingerprint, eye colour, retina or iris scan, vein pattern, toe, palm, and foot prints were extensive and considered by the Court unnecessary to generate an ID number.[98] Notwithstanding that some biometric information is currently used by various agencies to generate their respective identifications, the additional requirements increased the infringement on people's privacy and security.

The NIR Act also outlined that, as a precondition to receiving goods and services from public entities, a national identification card or NIN would have to be presented.[99] Even with the use of a legal functional ID, citizens would still be unable to access goods and services. This prerequisite would have treated individuals on unequal terms when compared with foreigners, because the condition only applied to Jamaican citizens and permanent residents. The provision, therefore, enabled foreigners to gain access to the same goods and services that citizens were denied, using any form of legal identification. Based on the law, this was discriminative against citizens, and thereby infringed on the right to equality before the law.

The absence of the right to opt out of enrolment, backed by the imposition of a criminal sanction, violated persons' right to privacy. Embedded in the Charter of Fundamental Rights is the right to respect for protection of private and family life, and protection from inhumane or degrading punishment. Threatening citizens with the risk of incarceration for failure to register can deprive an individual of their inherent dignity, as this deterrent would not necessarily lead to enrolment.[100] As such, persons would remain "invisible" to the state.[101]

The lack of a Data Protection Bill weakened the case for the constitutionality of the NIR Act. The burgeoning of the digital economy and the consequent increased participation of individuals in the online world have emphasized the importance of data protection. In the NIR Act, there was an overall mandate for information to be secure and to ensure the highest standard of data protection.[102] However, neither of those security standards were outlined in the law, which is indispensable for legislation that depends on the biometric, biographic, and demographic aspects of an ID. For example, notwithstanding the fact that there were specific sections outlining circumstances wherein access to the database may be granted, the NIR Act did not sufficiently justify the need for third parties to obtain citizens' information. Also, regarding the treatment of authentication records, it

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98 Williams (2019), ibid.

99 The production of a NIN is not a precondition in the case of emergencies or any situation that poses a threat to health or life.

100 The risk of incarceration is a "reduced risk". This means that on the one hand the Act threatens imprisonment for persons who fail to pay the fine imposed for failure to enroll, and on the other hand, the Act instructs Parish Court Judges to impose other punishment instead of imprisonment for persons who do not pay the fine.

101 National identity is a legal link between the state and the citizen; the absence of this link makes an individual invisible. That is, vulnerable, defenseless, hidden, marginalized yet, living among us. Semegnish Asfaw, "The Invisible Among Us: Hidden, Forgotten, Stateless," World Council of Churches Publication, 2016, www.oikoumene.org/en/resources/publications/copy_of_VV_InvisibleAmongUs_marketingpages.pdf.

102 Jediael Carter, "Team needs parliamentary speed National ID system deadline," *Observer*, September 10, 2017, www.jamaicaobserver.com/news/team-needs-parliamentary-speed-to-meet-national-id-system-deadline_110417?profile=1373.

> **There was no emphasis in the law on the requirement for the owner of the data to give consent before the Authority can share the data. This gap would have compromised the privacy and security of the person, as guaranteed under the constitution.**

did not outline an adequate data retention period. This carried an undeniable risk to the protection of citizens' right to privacy.

There was also no emphasis in the law on the requirement for the owner of the data to give consent before the Authority can share the data. This gap would have compromised the privacy and security of the person, as guaranteed under the constitution. If the owner does not give consent, then the persons requesting the data could then approach the Court to assess the circumstances, and ask for the Court to decide whether the sharing of the data should be authorized. Instead, the Act implied that the Prime Minister had the power to authorize the Authority to disclose information at his discretion, which would replace the judicial input. This provision giving the Prime Minister the power to choose to disclose a citizen's information, without that citizen's consent, circumvents the duty and responsibility of the judiciary to govern the actions of the Executive and how they affect the rights of citizens.[103]

The Data Protection Bill, which is said to be built on the framework of the European Union's General Data Protection Regulation (GDPR,) and was approved by Parliament in June 2020, would have (and did) addressed these concerns in explicit terms.[104] How personal data should be collected, processed, stored, used, and disseminated in physical or electronic form, and also penalties for failure to protect such data, would be (and were) outlined.[105] For these reasons, the panel found it pertinent to have the establishment and implementation of the data protection bill occur prior to the approval of the NIR Act.

In adjudicating the concerns of the Act, it was unanimously decided that the remaining portions of the law were inseparable from the contravening provisions, and that it could not stand. The Holness administration was therefore tasked with drafting a new NIR Act for the implementation of the ID system.[106]

Adding to the foundation on which this new national identification system will be built are the technical features and standards of digital identification systems, in general. These will be examined in the next two sections and, having done so, based on the Jamaican context, identify those most appropriate.

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103 Separation of powers is a doctrine of constitutional law under which three branches of government -the executive, legislative and judicial- are kept separate. This is to prevent the concentration of power and provide checks and balances. National Conference of State Legislatures, "Separation of Powers—An Overview," May 1, 2019, www.ncsl.org/research/about-state-legislatures/separation-of-powers-an-overview.aspx.

104 "Senate passes Data Protection Bill," *Observer*, June 13, 2020, www.jamaicaobserver.com/latestnews/Senate_passes_Data_Protection_Bill?profile=0.

105 Ainsworth Morris, "Government Moving to Complete Data Protection Bill," Jamaica Information Service, July 1, 2019, https://jis.gov.jm/govt-moving-to-complete-data-protection-bill/.

106 Balford Henry, "New NIDS Bill by year-end," *Observer*, May 23, 2019, www.jamaicaobserver.com/front-page/new-nids-bill-by-year-end_165526.

5 Digital Identification Systems: The Identity Lifecycle

ENROLMENT into digital ID systems involves electronically **CAPTURING AND RECORDING KEY IDENTITY TRAITS** from the person who claims a certain identity.

The digital identity ecosystem is increasingly complex, with a wide range of identity models and actors with diverse responsibilities, interests, and priorities.[107] An integral part of this ecosystem is the identity lifecycle that explains the capturing, storing, and maintaining of identities. The digital lifecycle, illustrated in figure 1, has four fundamental stages: registration, which involves getting people into the system, and in so doing, determines the level of assurance (LOA) of the identification; issuance, the provision of identity credentials; authentication, the verification of an identity to engage in transactions; and management, which includes the updating and revocation of other identities.

Figure 1: The Identity Lifecycle

Source: GSMA report on Digital Identity: Towards Shared Principles for Public and Private Sector Cooperation[108]

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107 Julia Clark et al., "Digital Identity: Towards Shared Principles for Public and Private Sector Cooperation," A joint World Bank Group – GSMA – Secure Identity Alliance Discussion Paper, 2016, www.gsma.com/mobilefordevelopment/wp-content/uploads/2016/07/Towards-Shared-Principles-for-Public-and-Private-Sector-Cooperation.pdf.

108 Clark (2016), ibid.

Although the system is not impenetrable, the risks associated with using biometrics to generate a trusted ID are low because of the level of confidence and accuracy.

Registration

The registration process is the first step in creating digital identities. It begins with enrolment, followed by validation. Enrolment into digital identification systems involves electronically capturing and recording key identity traits from the person who claims a certain identity. Attributes may include biographical data, biometric data, demographic data, and other attributes.[109] The attributes captured during this phase and the methods used are crucial in assessing the trustworthiness of the identity and its usage and interoperability with existing identity systems. Once a person has claimed a certain identity during the enrolment process, that identity is then validated by checking the presented attributes against existing, authentic sources.

A part of the process of validating an individual's identity is "identity proofing."[110] This is the level of assurance that a person is who he claims to be, and is dependent on the method of identification and the scope of personal information and attributes collected about an individual during enrolment. The use of unique biological attributes, like biometrics, is most apt in ensuring a secure and trustworthy identification. Although the system is not impenetrable, the risks associated with using biometrics to generate a trusted ID are low because of the level of confidence and accuracy. Biometric data cannot be stolen, forgotten, exchanged, or forged, and thus creates an irrefutable link to the holder of the ID.

The levels of assurance depend on the strength of identification and authentication processes, and are critical to control access to data and systems, and reduce identity theft. Not all services require the same level of assurance because some transactions are riskier than others.[111] In low risk scenarios, the use of single factor authentication such as the unique identifier or a password/PIN is appropriate. Higher security authentication requires an in-person authentication as a stronger proof of identity, such as a biometric scan (fingerprint, for example,) that will reduce the risk. High security transactions are exemplified by the signing of an official document or the collection of a welfare payment.

Issuance

A registered identity must go through an issuance or credentialing process before it can be used by a person. The traditional paper-based ID issuers normally provide documents such as a birth certificate or a tax registration number. For an ID to be considered digital, the credentials or certificates issued must be electronic; that is, they are captured, stored, and communicated electronically. The choice of credentials will be unique to the purpose of the card and the technical details required.

National identifications can take various forms. They include smartcard, 2D bar code card, mobile identity, and ID-in-the-cloud. Smartcards can authenticate a user's identity using multiple authentication factors for varying levels of assurance. These range from low risk to high risk, where PINs and digital signatures, based on PKI technology, are used, respectively; fingerprints can be used to establish a univocal link between the data and the user. Smartcards are also accompanied by small microprocessors that store data. The 2D bar code cards (used in most African countries) are cards encrypted with a flat bar code containing a person's personal data and biometrics. This card can also use a microprocessor to store data and compare live biometric information with data on the card. Mobile phones can be used to provide portable digital identification and online authentication. SIM cards can be issued with digital certificates or use other mobile network assets to enable secure and convenient identification and authentication for e-government services and other private or public platforms. Countries may also opt to use intangible electronic authentication methods such as the ID-in-the-cloud. This method stores data on a server and, like the Aadhar programme that only issues a paper receipt, can use a non-electronic form to issue NINs. For security measures, cryptographic key generation and management can be used to protect the ID credentials against theft.
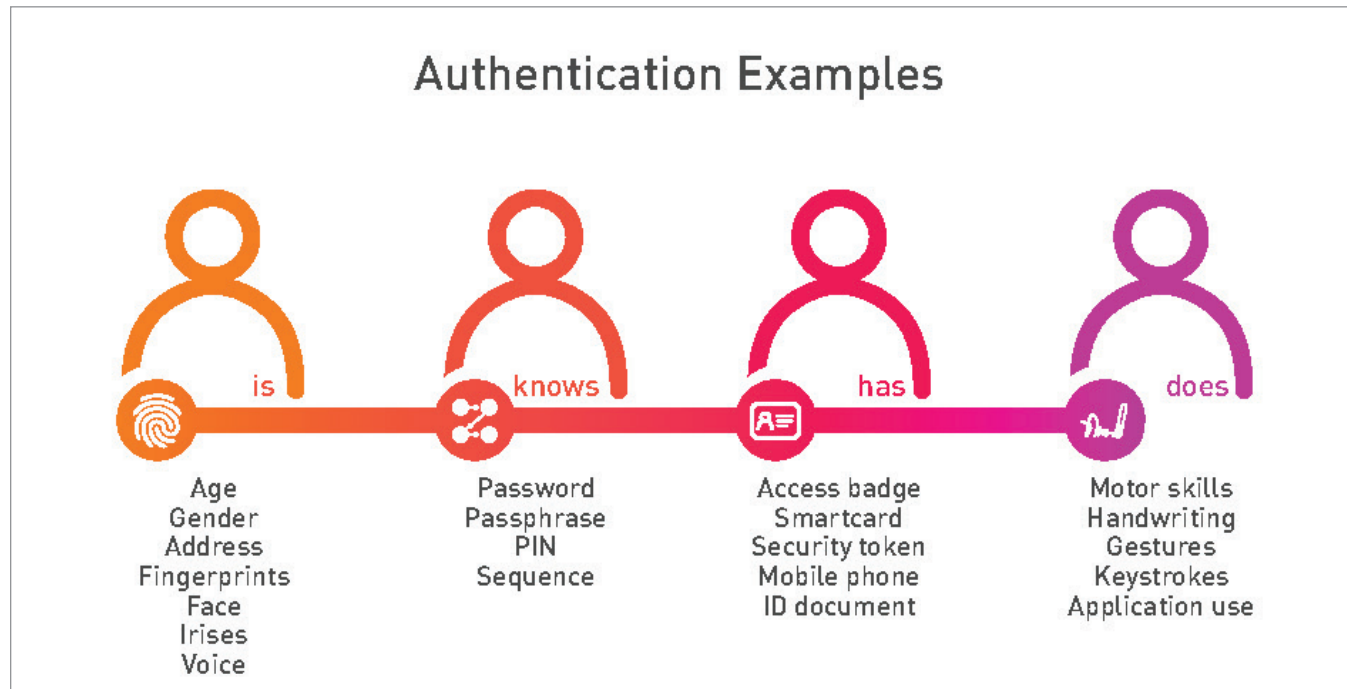
Authentication

Once registration and issuance are successfully completed, the digital identity can be used to access associated benefits and services, such as e-government services like e-health, paying of taxes, and voting through e-government portals. Bank customers can use digital IDs to access intermediate financial services via their mobiles. To access these services, the user must be authenticated – using one or more authentication factors (what a person is, what he knows, what he has, or what he does) to establish his identity.

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109 Biographical data refers to name, date of birth, gender, address, email; biometric data includes fingerprints, iris or retina scan and face; demographic data refers to age, education and religion.

110 Deduplication is the process of eliminating duplicate copies of repeating data. It combines a variety of attributes. For example, India utilizes biometric de-duplication (fingerprint and iris scan) to achieve uniqueness.

111 Level of Assurance (LoA) 1- no identity proofing; little confidence that this is the person; LoA2- basic identity proofing (single factor of authentication such as username/password or possession and control of a device); LoA3- more stringent identity proofing (multifactor authentication such as a device + a pin); LoA4- in-person identity proofing required (biometric authentication or strong cryptographic authentication like the use of a mobile signature)

Figure 2*: Modes of Authentication of Identity*

Authentication Examples

is	knows	has	does
Age	Password	Access badge	Motor skills
Gender	Passphrase	Smartcard	Handwriting
Address	PIN	Security token	Gestures
Fingerprints	Sequence	Mobile phone	Keystrokes
Face		ID document	Application use
Irises			
Voice			

Source: GSMA report on Digital Identity: Towards Shared Principles for Public and Private Sector Cooperation[112]

When authenticating an identity, highest privacy standards should be a guide. The International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC) have provided a framework for managing authentication assurance in a given context. An analogous approach has been adopted by the eIDAS, the legal framework in Europe which defines and outlines technical details of ISO/IEC standards.

Management

During the lifecycle, digital identity providers are tasked with managing and organizing the system. This includes the facilities, staff, record keeping, compliance and auditing, and updating the status and information of registered individuals. Users may need to update various identity attributes such as marital status, name, address, or profession, depending on the minimal set of unique identity attributes. Identity providers may also need to revoke an identity, which involves invalidating that identity for either fraud or security reasons, or terminate an identity in the case of death.[113]

The comprehensiveness and efficacy of the operation of the identity lifecycle is important and depends on the digital identity framework. This framework itemizes key models that are usually tailored to the country's specific needs, as not all available elements are relevant to every country.

112 Clark.
113 Clark.

6 Digital Identity Framework

Governance model refers to the government's role in the digital identity ecosystem. Three possible roles are:

- **THE IDENTITY PROVIDER**
- **REGULATOR**
- **IDENTITY BROKER**

The digital identity framework refers to establishing a suitable implementation strategy that will subsequently determine the successful operation of a digital identification system. There are different models, each of which will vary based on a country's goals for the identity system. The framework includes governance models, adoption approaches, and sustainability models.[114]

Governance Model

Governance model refers to the government's role in the digital identity ecosystem. Three possible roles are: the identity provider, regulator (without being the provider,) or identity broker.

As identity provider, the government has the direct responsibility of operating the digital lifecycle, from registration of identities to revocation of identities. The role of identity provider also includes that of the regulator. Therefore, the government is responsible for providing guidance and control of the system by producing specific laws, regulations, criteria, conditions, procedures, and controls for the management of people's identities. An advantage of this model is that the government's presence within the physical jurisdiction allows it to assume greater control over the operations of the system. The disadvantage is that third parties, or private companies, have the ability to give citizens a better experience by leveraging a system that speedily innovates widespread services linked by digital identities; this is because they are profit-driven. Success stories of having the government as identity provider is found in most European and Latin American countries.

With the government as only the regulator, the model implies that other agencies are employed to act as identity providers. Therefore, the government is tasked to issue laws, regulations, and criteria for accrediting the entities to act as identity providers. In doing so, the government provides subsidies aimed at rewarding third parties for services provided and related costs. The Canadian government, by selecting SecureKey Concierge to provide citizens with identities, acts as the regulator in their digital framework.[115]

In the identity broker model, the

114 International Telecommunication Unit, "Digital Identity Roadmap Guide," 2018, www.itu.int/en/ITU-D/ICT-Applications/Documents/Guides/ITU_eID4D_DIGITAL%20IDENTITY_ROAD_MAP_GUIDE_FINAL_Under%20Review_Until-05-10-2018.pdf.

115 Canada's approach has been different from other countries: the goal of their system was to provide an alternative ID and authentication to that offered by

With the government as the identity provider it has the direct responsibility of operating the digital lifecycle and enforcing laws and regulations for the system.

government has the essential role as an intermediary between service providers and identity providers. That is, they employ private agents to provide a user-centric and centralized way of managing identities. This involves building a trust relationship between external identity and service providers. An advantage of this model is that users are not forced to authenticate themselves based on the criteria of a single identity provider. Instead, they are provided with a list of identity providers from which they can authenticate themselves. An example of a successful implementation of this model is in the United Kingdom. The government selected eight identity providers that give citizens the opportunity of accessing central government services by verifying their identity using one of the providers.

Sufficient, consistent, and continuous funding provides the foundation for

an effective and durable system. The governance model used determines how resources are allocated to implement, maintain, and update the system. Successful execution of digital systems will require a sufficiently high level of investment to ensure its sustainability. Governments can consider potential revenue flows by offering identity services to service providers to offset costs.

Public private partnerships are ideal in creating a sustainable user-centric model. There is significant scope for private sector innovations in new technologies that could strengthen the ability of remote or vulnerable populations to access key services. With this potential partnership there will be challenges that both public and private stakeholders must work together to ensure that digital identity systems are effective, secure, inclusive, and trustworthy.[116]

Approaches to Adoption

The next decision to consider, within the framework, is the approach to adoption. Globally, digital identification systems still exclude users.[117] Some systems fail to give users access to services they need, while others ignore the importance for individuals to have control over how their information is utilized. For users of a national digital identification to realize and harness the true value of a digital ID, systems must be designed with the users as the focal point. Elements to consider

include privacy by design, inclusiveness, real value of identity to users, and the voluntary nature of the issuance.

Privacy by Design

Data privacy and protection are crucial in developing reliable digital systems. Data privacy, which is the appropriate access to and use of personal data, requires employing policies and processes to ensure that consumers' personal

the government. Through Concierge, access to public services is based on a "bring your own credentials" (BYOC) model, where users are allowed to use credentials they already have and use.

116 Clark.

117 World Economic Forum, "Identity in a Digital World: A new chapter in the social contract," September 2018, www3.weforum.org/docs/WEF_INSIGHT_REPORT_Digital%20Identity.pdf.
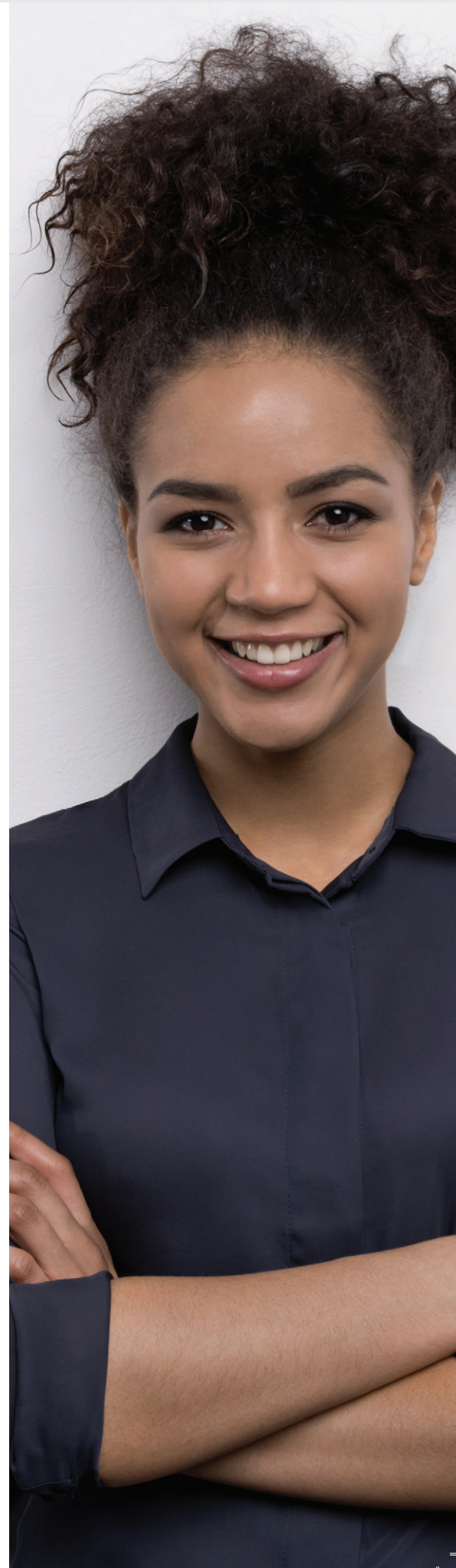
> ## The literal value of the ID is reflected in the services citizens can access by using it. Usually, access to public goods and services, such as demographic, health, welfare, and tax and pension services, is the dominant driver because of their importance.

information is being collected, shared, and used in appropriate ways; this also enables the "once only" principle which means that citizens share general personal information only once with public administration bodies, and this information is shared as needed among government agencies. Data privacy and protection, more so, give users the right to have control over how their personal information is harvested and used.[118] Data protection focuses on securing the data from malicious attacks. In doing so, to ensure data security, technologies such as encryption (encoding information to be understood only by the receiver,) backup (copying or archiving information in the event of data loss,) data-masking (obscuring original data with modified content,) and data erasure (destroying data to prevent unauthorized disclosure) can be applied.[119]

Data privacy is essential in building digital ID systems. While the opportunity and benefits are great, so are the risks. Risks, such as unauthorized use and transfer of data by individuals or government agencies, can occur. The structure of ID systems must therefore be designed to innately protect user privacy and control. This, together with a comprehensive legal and regulatory framework that safeguards data privacy, security, and user rights, can create a robust and trusted system.

Principles of privacy include clear purpose for which the information is collected, limiting the amount of data to the minimum requirement, and ensuring that authorities assume responsibility for data security and are compliant with law. Legislation, like article 5 of the European Union's GDPR, has been used to support these principles. This regulation, in setting out principles of privacy and processing of personal data, has reinforced the principles by applying penalties for failure to comply. Countries that have implemented identification systems have established legal and institutional frameworks to build their privacy ecosystems. For example, privacy in Estonia is recognized under the country's Constitution, Personal Data Protection Act, Public Information Act, and Electronic Communication Act. Institutionally, they created a supervisory body, the Estonian Data Protection Inspectorate, which is empowered by the legislation. India, although launching Aadhar before passing any legislation, has now passed the Aadhar Act, the Information Technology Act, and a draft Personal Data Protection Act.[120] They have created the Unique Identification Authority of India as the sole issuer of identities in India.

Inclusiveness

Digital IDs must have universal coverage, and must be accessible, usable, and cost efficient. Foundational digital IDs have the capacity to achieve more coverage because their purpose is to provide a universally accepted form of identification. This should be enhanced by the removal of barriers in the form of direct and indirect costs. Civil registration and initial birth and death certificates should be given free of charge to individuals. Similarly, the initial issue of a legal ID should not be priced, especially if its acquisition is mandated by law. Where costs are being contemplated, they should be reasonable, proportional

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118 World Bank, "Privacy by Design: Current Practices in Estonia, India, and Austria," Washington, DC: World Bank 2018, http://documents.worldbank.org/curated/en/546691543847931842/pdf/Privacy-by-Design-Current-Practices-in-Estonia-India-and-Austria.pdf.

119 Data erasure is a software-based method of overwriting that destroys all electronic data residing on a hard drive. World Bank (2018), ibid.

120 The Aadhaar and Other Laws (Amendment) Bill, 2018, Bill No. 261 of 2018, http://164.100.47.4/billstexts/lsbilltexts/asintroduced/261_2018_LS_Eng.pdf.
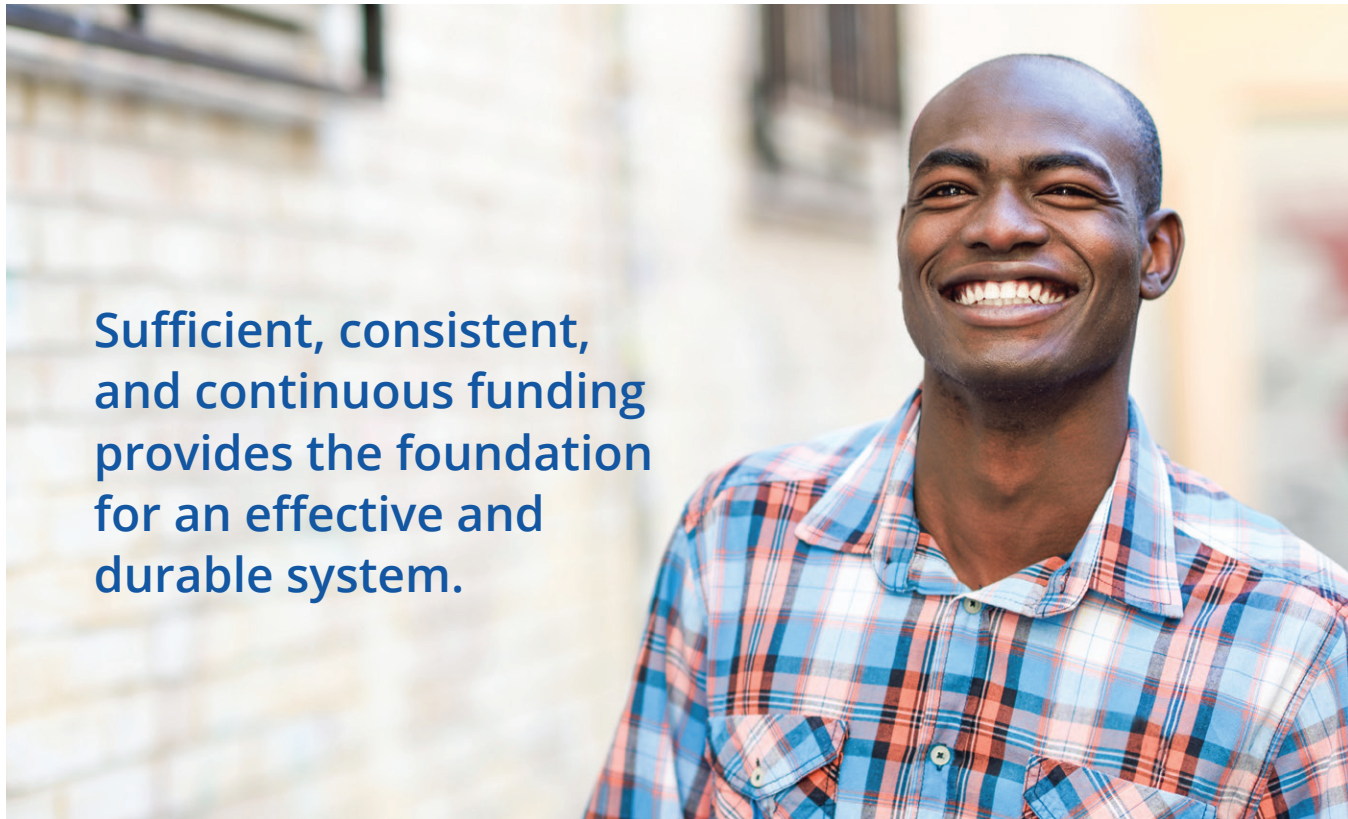
> **Sufficient, consistent, and continuous funding provides the foundation for an effective and durable system.**

to cost incurred, and transparent to the public. Minimizing indirect costs, in the form of transportation, can increase accessibility of the ID. This involves the use of, where necessary, mobile units to facilitate the enrollment of persons living in remote areas. Also, no advanced skill should be required to use the ID, and an adequate level of support should be provided for persons with low digital literacy.

User Value

The value, in terms of public and private services that can be accessed with the identity, is critical towards incentivizing its widespread adoption. The literal value of the ID is reflected in the services citizens can access by using it. Usually, access to public goods and services, such

as demographic, health, welfare, and tax and pension services, is the dominant driver because of their importance. Extending access to private services can further increase interest. For example, the government, as the identity provider or regulator, can recruit mobile services providers and financial institutions to make use of the ID.

Voluntary Issuance

Determining whether the nature of identification systems should be mandatory or voluntary can influence the speed of adoption. Although the success of the system does not entirely depend on this, each choice will require various approaches to increase adoption.

For voluntary systems, enrolling for

a digital ID needs to be supported by valuable services that require the ID, else the system will struggle to succeed. Governments, therefore, must encourage participation by promoting the use of the ID among public and private administrations. With voluntary digital identity, the adoption is usually slow, and citizens do not automatically perceive and enjoy the benefits of the electronic features of the card.[121] An example of this is in Italy, where the pace of adoption has been slow. In 2001, Italy became the second country in the world to issue national electronic identification, after Finland, but the first to have such a document that substitutes the conventional means of identification (since Finland's eID had to be used with a paper-based document.)[122] Despite this, Italy was ranked 24th out of 28 European Union member states for

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121 Organization for Economic Co-operation and Development, "National Strategies and Policies for Digital Identity Management in OECD Countries," OECD Digital Economy Papers, No. 177, OECD Publishing, Paris, 2011, https://doi.org/10.1787/5kgdzvn5rfs2-en.

122 Phillip Willan, "Italy issues first electronic identity card,"IDG News Service, March 19, 2001, www.computerworld.com/article/2799023/italy-issues-first-electronic-identity-card.html.

level of digitization.[123]

Similarly, mandatory-based issuance does not guarantee sustained usage and trust. It must be combined with a wide offering of services, public and private. This can be partially or fully mandatory. Partially implies compelling users to access a series of public services, online or offline, using the digital identity. For example, India's Aadhar programme was not mandatory to access services except for welfare programmes and filing taxes. So, if citizens wanted to enroll in the public distribution system, they had to possess an Aadhar number. India's e-governance also promoted the ID's widespread adoption. Fully mandatory systems require the ID for private and public sector usage. An example of this is Estonia, where the ID is needed to access all services.

In an attempt to design and implement a digital national identification system for Jamaica, the most suitable elements from the governance, adoption, and sustainability models were selected and will be further discussed in the section seven.

123 Milena Gabanelli and Rita Querzè, "Public Administration, the failure of the state digital revolution that costs us 30 billion a year," *Corriere Della Sera*, January 12, 2020, www.corriere.it/dataroom-milena-gabanelli/digitalizzazione-pa-carta-digitale-benefici-25-miliardi-anno-interventi-da-fare/bac5ddd8-3557-11ea-8d46-5a62eb738d23-va.shtml.

7 A National Identification System for Jamaica

In addition to economic benefits gained by the government, a national ID supports SDG 16.9, which itself underpins many targets outlined in Jamaica's own

VISION 2030 STRATEGY

There may be no single factor that affects a person's ability to share in the gains of national or global economic development as much as having a widely-accepted identity. In addition to economic benefits gained by the government, a national ID supports SDG 16.9, which itself underpins many targets outlined in Jamaica's own Vision2030 strategy. The ID will facilitate the interoperability of identification systems to create more robust identifications and reduce the possibility of identity theft. This digital identification enables the onboarding of digital services such as e-government, that can minimize transaction times for citizens.[124] With one in every five Jamaicans unbanked, providing a reliable and secure identification can increase access to financial services such as remittances, savings accounts, and credit. This, in addition to the creation and increased usage of mobile money and other intermediate financial products, can enable low income and lower-middle income households can be more financially resilient.

These services also reduce the cost of engaging in transactions with financial institutions, and of essential services such as bill payment.

The goal of implementing a national ID is motivated by the need to provide a citizen-centric view of the array of benefits that can be leveraged from digital foundational IDs. This system will provide Jamaicans with a single definitive and trusted identification that not only empowers them but enables a secure means of access and authentication. It will utilize the "once only" principle, eliminating the need for citizens to repeatedly submit the same information to different public agencies. This digital foundational ID, unlike the existing forms of ID, will grant citizens access to a digital platform that delivers government services such as health, tax, welfare and pension, registration of businesses, and transfer of property. In doing so, it will appeal to both those who do not have any ID and those who already have an existing functional ID. For the undocumented, they will be leapfrogged to having both a digital and physical identity that expands

their access to goods and services. For those who already have an ID, they will have the opportunity to access goods and services only accessible using the digital ID. The ID will also enable the interoperability of existing identity systems to strengthen their accuracy and completeness.

The GOJ should act as the identity provider, through the National Identification and Registration Authority. As the sole issuer of the national digital identity, the Authority is accountable for creating, processing, and safeguarding citizens' and permanent residents' identity. The Authority, as empowered by the NIR Act, is also responsible for authenticating, where necessary, their identities while accessing digital services of public and private providers. To engender trust in the system, an independent body mandated to oversee the operations of the Authority is also required. The Authority would be accountable to this body, and would therefore be responsible to document all procedures and communicate them to the body. This documentation includes

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124   Roseth and Reyes.

To engender trust in the system, an independent body mandated to oversee the operations of the Authority is required.

the sharing of information within the database to government and third parties.

To ensure the adoption of the ID, privacy and security of citizen's data must be prioritized and enforced alongside the extensive provision of digital services. Privacy guidelines include a minimal set of data requirements to generate a unique identifier; limited use, retention, and disclosure of information held within the database; and user consent, unless otherwise stated by law. These guidelines are emphasized to engender trust in the system. By creating trust, citizens are more inclined to capitalize on the benefits.

The collection of limited personal information is necessary. Parallel to the European Union's eIDAS Implementing Regulation (2015/1501,) this system will request the minimum data set of unique attributes for a person. This set includes both mandatory and optional attributes. The mandatory information includes current family name(s), current first name(s), and date of birth. The optional information is first name(s) and family name(s) at birth, place of birth, current address, and gender.[125] The current address is optional because the aim of this system is to provide a reliable and unique source of identification. Furthermore, because of the constant relocation of individuals, the system will not be able to maintain up-to-date records if an address is mandated.

Biometric information will also be required because of its irrefutable link to individuals. The type of biometric data required is that which is necessary to authenticate users. Fortunately, these have already been collected to generate other IDs in Jamaica. They are fingerprints for all fingers and the registrant's facial image for registered voters.[126]

The type of electronic credential best suited in the Jamaican context is a smartcard. A smartcard is, effectively, a small portable computer, typically the size of a credit card, that integrates a microprocessor, memory, and various applications. It offers advanced security features that can identify and authenticate individuals. Smartcards are capable of storing digital credentials and biometric templates, in an encrypted form, in the card's memory. The processor on a Smartcard carries embedded files that are used, in an electronic environment, to identify the user.[127] Therefore, they can be used in conjunction with contact and contactless card readers, such as point of sale machines, ATMs, and even mobile phones. They allow users to authenticate their identity using multiple authentication factors for varying levels of assurance. The data stored on this credential can also be accessed offline for authentication where there is no internet connection or mobile network, known as "match-on-card." This enables users in remote areas to still be able to engage in transactions that require authentication.

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125 The European Union, "Regulations L 235/1," Official Journal of the European Union, September 9, 2015, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R1501&from=EN.

126 Based on law, the fingerprints are usable only for electoral purposes. The Representation of the People Act (1944), https://moj.gov.jm/sites/default/files/laws/The%20Representation%20of%20The%20People%20Act.pdf.

127 As a means of securing the unique identifier on the chip, during sharing or storage, tokenized ID numbers can be considered. Although this is similar to encryption, it is not the same. During sharing, the format of tokenized files does not change, therefore maintaining the strength of its security. On the other hand, format-preserving encryption schemes come with a tradeoff of lower strength. Alexandra Boldyreva and Paul Grubbs, "The Cloud Encryption Handbook: Encryption Schemes and Their Relative Weaknesses and Strengths," McAfee, April 2018, www.skyhighnetworks.com/cloud-security-university/tokenization-vs-encryption/.

Registrable individuals will be identified using a unique identifier, which lasts forever. This unique identifier (UID) can be a numeric or alphanumeric digit that will not expire, even after death, and is associated with a single entity. In this digital system, a randomized UID in the form of a nine-digit number will be generated and issued by the Authority.

Considering the court ruling regarding the mandatory nature of the system, to achieve full adoption, enrolment for the ID should be voluntary, but required for certain services. The services to be accessed only through the national ID should include e-government services and social protection programmes. However, even with this approach, full adoption is not guaranteed. Therefore, enrolment should be followed by an extensive offering of other digital services, only accessible by the ID. This will involve incorporating the private sector by incentivizing them to provide digital services that are useful and valuable to customers, and would consequently improve efficiency in service delivery. In other words, there must be an overwhelming incentive to enroll.

The use of the ID for KYC requirements, while broadening access to financial services, can increase adoption. Ways to leverage the ID for KYC requirements include mandating ID only for certain levels of the tiered KYC mechanism and for purchasing SIM cards, which eases onboarding into the mobile money market. For example, in the institution of tiered KYC conditions, Latin American countries, such as Peru, require only the national ID to open restricted accounts.[128] Also, many East African countries have mandated the use of IDs for SIM registration. This is because SIM registration can reasonably constitute the minimal KYC requirement for opening a mobile account.[129]

In launching of the ID, enrolment can be conducted in phases, beginning with prioritizing the most vulnerable, and the ones that are easiest to reach. These are persons existing in the databases of social programmes. Requiring enrolment not only gives them an ID that is more reliable and secure than the current identifications, but it also allows them to reap benefits generated by the ID. This includes becoming financially included by accessing formal banking services or intermediate financial products such as mobile money.
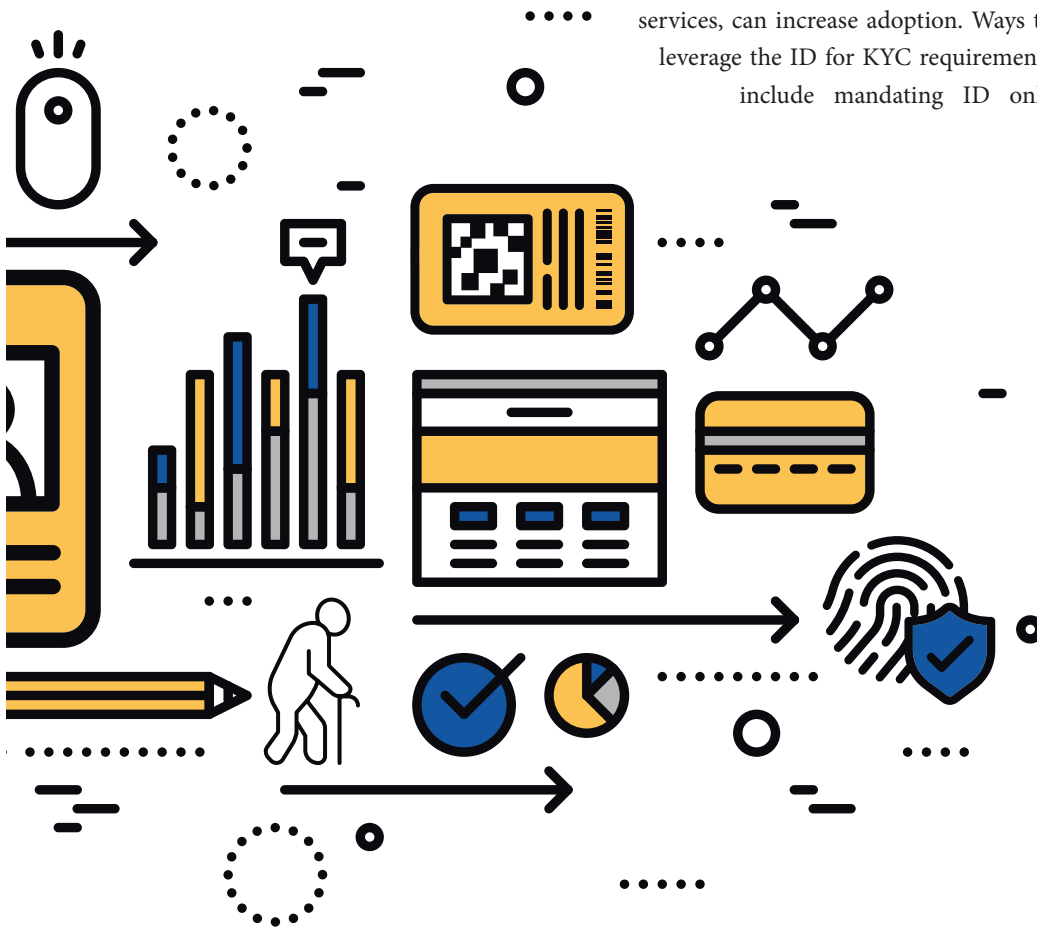
Additionally, the efficacy and efficiency in the service delivery of welfare programmes can improve by mandating enrollment. Presently, there is no interconnection among the databases and so the possibility exists that there may be duplicate, ineligible, or ghost beneficiaries in the system. Furthermore, with the collection, registration and updating of information on beneficiaries being manually done by personnel, the system is more vulnerable to mistakes and fraud.[130] By creating a link among the

128 Alan Gelb, "Balancing Financial Integrity with Financial Inclusion: The Risk-Based Approach to "Know Your Customer," CGD Policy Paper 74. Washington DC: Center for Global Development, 2016, www.cgdev.org/publication/balancing-financial-integrity-financial-inclusion-risk-based-approach.

129 Gelb.

130 Auditor General's reports 2011 and 2018. These reports also give evidence of fraudulent activities by officers, within the Ministry of Labour and Social Security Department, who have reactivated the profiles of dead beneficiaries and use their accounts to siphon funds. Auditor General's Department, "Compendium of Special Investigations Report on the Ministry of Labour and Social Security NIF Equity Management and Rehabilitation Programme," 2018, https://auditorgeneral.gov.jm/wp-content/uploads/2018/03/MLSS-Compendium-Report-March-2018.pdf.
During the Covid-19 pandemic, the Auditor General's Department unearthed that the Ministry of Labour and Social Security paid more than J\$5 million to 776 persons not qualified to receive this benefit under the PATH programme. This resulted in a hold on payments, which automatically disadvantaged the eligible beneficiaries. Edmond Campbell, "Hundreds not on PATH list get payouts", Gleaner, June 24, 2020, http://jamaica-gleaner.com/article/lead-

databases, this ID reduces the likelihood of leakages within the programmes by improving the identification and authentication of identities.

Subsequent phases can incorporate civil servants and government services. Civil servants are the most reachable because they are a controlled group with daily interactions with government as their employer. This group also consists of persons from all social strata from which the government can make inferences as if they are a pilot group, especially in terms of better enrolment mechanisms.

A third phase involves leveraging the ID to access all government services such as health, education, pensions, taxes, and real estate-related functions. Since Jamaicans spend more time engaging in government transactions (most of which are vehicular or tax related) than their peer countries, there is scope for greater efficiency and ease of doing business.[131] Utilizing this digital solution will help to accelerate the process of digital transformation in Jamaica by providing a platform for e-government services. In doing so, the ID mitigates some of the current inefficiencies faced by citizens.

Reaching the undocumented, particularly those who have no interactions with the government, will be more challenging. Therefore, special efforts to reach this group will be required. For example, Jamaica's census is due to be conducted in 2021. This presents an opportunity for the government to increase adoption among this difficult-to-reach group. Enrolment officers can be employed, alongside persons carrying out the census, to register persons for the ID. The use of mobile units can also assist in going to remote areas, making the enrolment process cheaper and more convenient for citizens. There will need to be collaboration with the RGD because birth certificates are required upon enrolment.

The purpose of the proposed national identification system for Jamaica is citizen-centric. It serves to provide a safe and trusted identification that allows citizens to engage in physical and digital transactions. For this to be achieved, there are specific elements that the system must possess. For example, having the GOJ assume the role of the identity provider, with an independent oversight body to whom they will be accountable,

and ensuring adoption of the ID by providing an extensive range of digital services, given the voluntary nature of the system, can increase the tendency for citizens to capitalize on the benefits. Also, in considering what information is necessary to produce an identity, the minimum set of data requirement is optimal; this includes first name, last name, gender, and fingerprint as the only biometric needed to authenticate users.

Subsequent to establishing the necessary privacy and security guidelines, the launching of the system may begin in phases by first requiring enrolment for persons who wish to access social programmes. This will enable them to benefit from social and financial inclusion, while improving the efficiency of the social programmes through interoperability. Second, mandating that civil servants, who are the most reachable, obtain the ID; and third, expanding the coverage to all government services. Even with these phases, it is possible to exclude persons who have minimal interactions with the government. Therefore, capitalizing on the national census due in 2021 can help to reach the undocumented.

stories/20200624/hundreds-not-path-list-get-payouts
131 Roseth and Reyes.
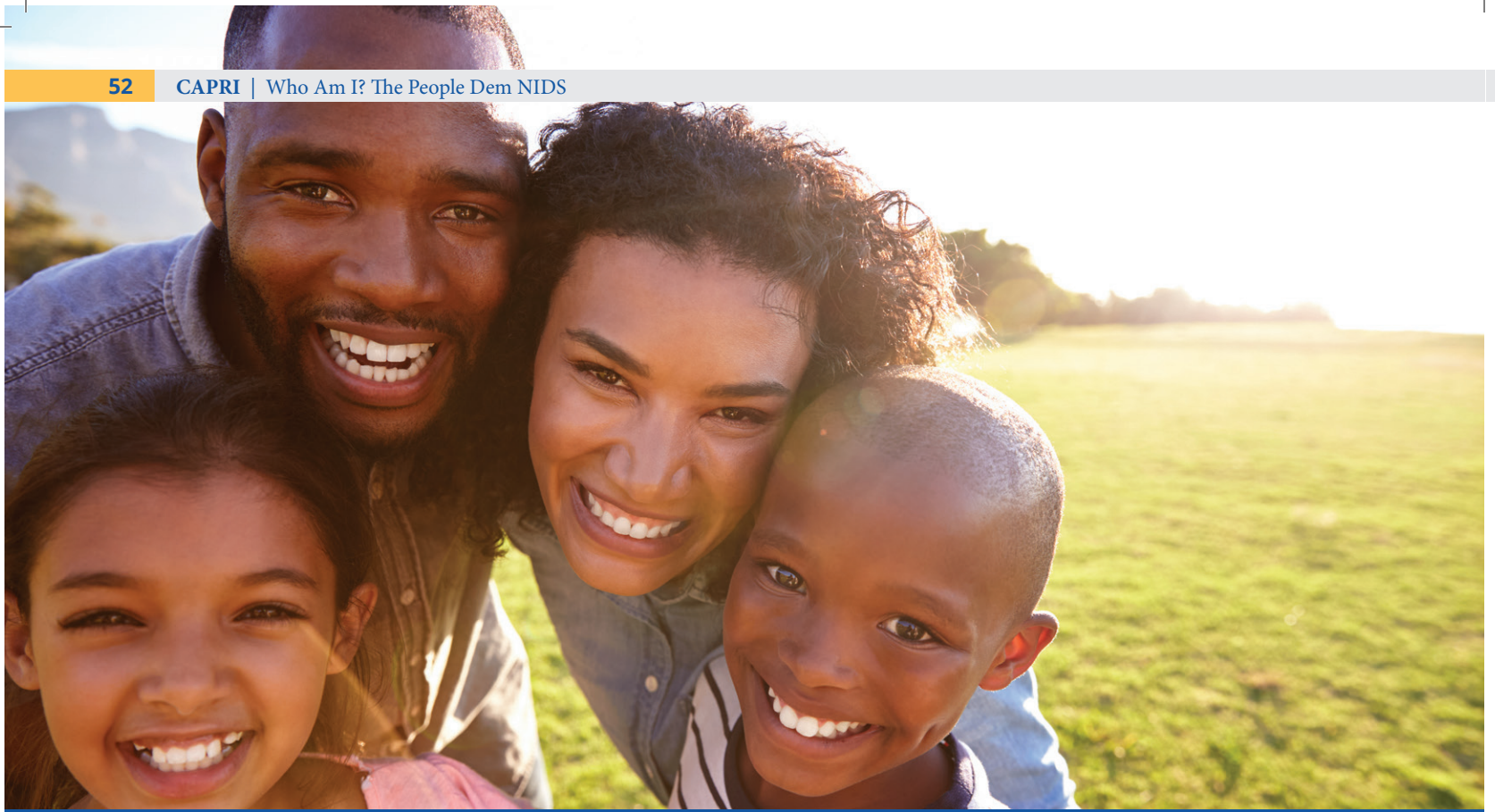
8 Conclusion and Recommendations

Persons who are unable to access
REMITTANCE SERVICES
because of no ID potentially **lose, on average,**

US$206
per transaction

The lack of a single trusted identification in Jamaica has cost its citizens in various ways. This cost is reflected in their inability to access essential services, such as financial and social services, and the loss of potential productivity. Approximately 13 percent and 3 percent of the adult population are unable to access bank accounts and social protection programmes, respectively, because of a lack of identification. Additionally, persons who are unable to access remittance services because of no ID potentially lose, on average, US$206 per transaction. Bank accounts, social welfare programmes, and remittance services are services that improve the financial resilience of citizens, but more so, the most vulnerable; with an improvement in finances, overall welfare tends to increase. With one in every five persons unbanked, engaging in transactions such as encashment and bill payment is more costly. On average, it costs J$318 to change a cheque and, for Jamaicans that utilize in-person methods of bill payment, J$6,825 is forgone from potential productivity.

Additionally, procuring the current forms of identification is associated with direct and indirect costs and operational barriers. For the driver's licence and passport, it costs each applicant at least J$10,000 (inclusive of provisional licence and driver's test,) and J$4,000, respectively. However, to obtain either, a JP's certification is required which, in terms of potential productivity, presents a loss of J$1,850. On the contrary, although the voter's identification is free, the operational procedures make it difficult to attain. For example, it can take up to four months as it depends on the date the applicant's name is published on the voter's list. Also, based on electoral legislation, applicants are required to have an address. As such, homeless persons are excluded.

These means of identification are not only costly but are limited in coverage as persons living in rural areas, and youths, are being underserved. As Jamaica's sole repository of vital life events, the RGD leaves four parishes without access as there are only ten offices; each civil registry serves 270,000 people. PICA has twelve offices island wide and the Island Transport Authority has thirteen motor vehicle depots, of which three are situated in Kingston & St. Andrew. It is also possible that youths under seventeen years old become unattached because of the current means of access. First, these youths are only eligible for a passport, which is costly, and second, to enroll in youth employment programmes, at the very least, a TRN is required. This TRN must be sorted out by a parent or guardian. The likelihood of a potential unattached youth having a parent or guardian who would take that initiative is probably quite low, making the process of obtaining an identification more difficult.

A universal national ID system provides a reliable and secure means of identifying individuals in the provision of essential services, to the benefit of the ID holders. Incorporating the use of digital tools will further increase the benefits as citizens will now be able to engage in electronic transactions such as e-government services, which feature is absent from the current, functional IDs. Access to these digital tools are even more relevant during pandemics, like Covid-19. With the privacy and security features recommended, Jamaicans will be able to

A universal national ID system provides a reliable and secure means of identifying individuals in the provision of essential services, to the benefit of the ID holders.

confidently prove their identities, without having to provide other documentations, and thereby access and benefit from public and private services, both existing and newly facilitated ones.

Recommendations

In consideration of the foregoing benefits to be gained by the holders of a universal, foundational identification, the new services it will facilitate, and the constitutional challenges to the government's initial proposal, the following recommendations are put forward:

- Citizens should be encouraged and incentivized to enroll in the universal ID system when it is promulgated by the government. While some of the benefits to them will be self-evident, the broader benefits that will accrue to the economy and so ultimately redound to them will be less obvious, and should be explained.

- For widespread adoption and for the benefits of the system to be fully

harnessed, the system should have strong incentives for enrollment in order to realize the broader benefits of a universal system. Although a voluntary-based system in Jamaica, void of incentives, will not achieve steady adoption for the ID, by mandating the leveraging of the ID for e-government services, social programmes, and KYC requirements, widespread adoption can be achieved.

- In requiring biometric and biographic information for the issuance of the ID, legislation must enforce the least intrusive methods necessary to achieve widespread adoption and maximum benefit. Currently, for Jamaica, only fingerprints of all fingers and a facial image should be necessary to generate an ID. For biographic information, only registrable individuals' first and last names and date of birth should be required. The address, other names of the individual, job, ethnicity, or other biographic information, should

be optional. However, because of the dynamism of technology, whether biometric or otherwise, the recommended features may require re-evaluation.

- The first phase of the system should issue the identification to beneficiaries of social welfare programmes. The ID will facilitate the interoperability of welfare databases and will help to increase the effectiveness of the programme by ensuring that the intended beneficiaries are reached.

- The second phase of the system should target public sector workers because they can be used as a pilot. The third phase can expand to rest of the citizenry and permanent residents.

- Persons who this ID will benefit the most are the most unreachable, so integrating identification enrolment with the upcoming census will help to capture these persons and give them the opportunity of registering for the ID immediately.

Notes

Notes

Who Am I?
The People Dem NIDS

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