Country Report:
Rebuilding Identification
and Stakeholder Engagement
in the Central African Republic

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Acknowledgements

Contents

Executive Summary

This report focuses on the Central African Republic and is part of a multi-region research seeking to identify and compare the state of biometrics and digital identity threats, usage, and impact in Africa, the Balkans, Central Asia, Latin America and the Caribbean, and South and Southeast Asia.

This report advances the argument for the holistic engagement of stakeholders in the implementation of foundational ID systems, beyond international institutions, governments, and private infrastructure providers. This applies to ID systems that integrate biometric data, biometric technologies, and digital identity.

The report grounds this argument in a case study focusing on *la République centrafricaine* (the Central African Republic or CAR). The focus on the CAR is informed by stakeholders' ongoing resistance to the government's rebuilding of the national ID system with support from a private entity, perceptions by the local populace of the foreign control of local populations' identity, and a humanitarian identity-related crisis rooted in what it means to be '100% Central African.'[1]

The CAR's 2013 crisis led to the destruction of an estimated 60–80% of identity documents, with implications for citizens' fulfilment of their right to identity, and their access and use of public services. In 2014, the CAR government commenced its efforts to re-issue ID documentation to its citizenry, without previously adopted biometric (fingerprint) features. Guided by an analysis of people's sentiment in publicly available reports, we conclude that the CAR government is not involving local stakeholders in redeployment of its ID system. The key findings are summarized in detail below and explored extensively in the report.

Key Findings

This report details the following findings:

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[1] Relief Web, "I Am 100% Central African": Identity and Inclusion in the Experience of Central African Muslim Refugees in Chad and Cameroon,' https://reliefweb.int/report/central-african-republic/i-am-100-central-african-identity-and-inclusion-experience-central, accessed 7 June 2023.

Finding 1: Effective foundational ID systems rely on political stability for their appropriate and inclusive development and implementation, practical usage, retention, and storage, including for archival purposes.

Finding 2: The ID contracting process in the CAR is opaque and the ID contract awarded to the private company, Al Madina, was not subjected to scrutiny by the relevant government entities, specifically the public procurement department. This raises queries about the legality of the contract.

Finding 3: Stakeholders, including those in government, continue to resist the state's identification rebuilding efforts.

- ❖ The delegation of the ID prerogative, which impacts national sovereignty, to a foreign company is a bone of contention for CAR citizens.
- ❖ Price increments for the costs of an ID card above CFA Francs 4,500 (USD 7.5) is contrary to the Finance Law.

Finding 4: Three key lessons are highlighted:

- ❖ Lesson 1: Rebuilding an exclusionary identification system will continue to generate pockets of local resistance in CAR.
- ❖ Lesson 2: ID processes must be grounded in local context considerations to support rights fulfilment.
- ❖ Lesson 3: Ensuring data sovereignty in ID processes is integral to fostering public trust during data collection/processing.

Recommendations

We urge the Government of the CAR to:

Adopt a participatory approach to the implementation of the identification system. This will involve engaging stakeholders throughout the process, from planning to implementation, and ensuring that their input is incorporated into the final product.

We urge CSOs in the CAR to:

Continuously monitor the implementation of CAR's identification system, by:

- ❖ Establishing a joint monitoring group bringing together CSOs and media to collaborate in the monitoring and assessment of the CAR's national ID system.

- ❖ Preparing communications and reporting material to bridge information gaps in the CAR's ID ecosystem.

- ❖ Leveraging reporting mechanisms, such as the African Commission on Human and Peoples' Rights to raise concerns and risks about the CAR's national ID processes.

The findings in this report highlight that the CAR is presented with an unprecedented opportunity to rebuild its national ID infrastructure in a manner that meets the needs and priorities of all stakeholders, while also ensuring trust, transparency, accountability, and data privacy and security.

Introduction

This report does not endorse the blanket adoption of biometrics in ID systems. We reiterate the World Bank's commentary that 'biometrics are not required or appropriate in all contexts especially where privacy, data protection, exclusion risks will significantly add to the cost of the ID system and add operational complexity.'[2]

Under Article 6 of the Universal Declaration on Human Rights (UDHR) and Article 16 of the International Covenant on Civil and Political Rights (ICCPR), the right to be recognized as a person before the law is an inalienable, universal right.[3] The right to legal identity, including birth registration, is advanced under Goal 16.9 of the Sustainable Development Goals.[4] Closely linked to the fulfilment of the right to identity is the provision of proof of nationality and other legal documentation, such as birth certificates and national or digital IDs, by states.

The right to nationality is recognized in numerous international and legal instruments, such as Article 24 of the ICCPR, which CAR ratified in 1981,[5] and Article 6 of the African Charter on Human and Peoples' Rights (ACHPR).[6] These rights are guaranteed under CAR's Constitution and the *Loi No. 1961.212 du 20 avril 1961 portant Code de la nationalité centrafricaine* dealing with nationality, identity, and citizenship.[7]

Central to the right to identity is the ability to prove legal identity, which is facilitated through state-issued civil and identity credentials, including birth certificates, national

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[2] World Bank, 'Practitioners Guide: Types of ID Systems,' https://id4d.worldbank.org/guide/types-id-systems, accessed 25 May 2023.

[3] UDHR, https://www.ohchr.org/en/universal-declaration-of-human-rights#:~:text=The%20Universal%20Declaration%20of%20Human%20Rights%20(UDHR)%20is%20a%20milestone,rights%20to%20be%20universally%20protected, accessed 25 May 2023. ICCPR - General Assembly resolution 2200A (XXI), https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights, accessed 25 May 2023.

[4] UN Legal Identity Agenda, 'Background,' https://unstats.un.org/legal-identity-agenda/, accessed 25 May 2023.

[5] The CAR ratified the International Covenant on Political and Civil Rights on May 8, 1981. United Nations Treaty Collection, 'Status of ICCPR,' https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-4&chapter=4&clang=_en, accessed 25/05/2023.

[6] African Charter on Human and Peoples' Rights, https://au.int/sites/default/files/treaties/36390-treaty-0011_-_african_charter_on_human_and_peoples_rights_e.pdf, accessed 14 June 2023.

[7] Central African Republic's Constitution of 2016, https://www.constituteproject.org/constitution/Central_African_Republic_2016.pdf?lang=en, accessed 25 May 2023. See also: *Loi n° 1961.212 du 20 avril 1961 portant code de la nationalité centrafricaine*, http://www.refworld.org/docid/3ae6b55d4.html, accessed 25 May 2023.

identity (ID) numbers/cards, or digital ID numbers/cards.[8] With advancements in technology, governments are continually incorporating biometrics, such as fingerprints or face images, into their ID documents and systems to provide secure and accurate "identity proofing (de-duplication) and/or...verification and authentication to service providers."[9]

The use of biometrics for identification (i.e., establishing uniqueness) or verification (i.e., authenticating transactions) is accompanied by benefits and challenges. In summary, some stakeholders argue that biometric identification establishes secure, accurate and reliable identities, and provides increased security to curb digital challenges such as identity theft and fraud.[10] On the other hand, it is argued that the operational, privacy and technological limitations of biometric identification outweigh any potential or perceived benefits of deploying biometric technologies for identification.

As demonstrated above, different stakeholders advance different arguments depending on their varied interests in a country's foundational ID system. This recognition underpins the report's call for holistic stakeholder engagement in the implementation of foundational ID systems in the CAR and beyond. Specifically, the report calls for a breakdown of the continuing siloed conversations between governments, international institutions, and private infrastructure providers of biometric and/or digital identity management solutions that are leading to the exclusion of other stakeholders, including end-users.

Illustratively, the rejection of biometrics and digital identity systems, which has been witnessed in countries such as Switzerland and Kenya, was driven by failures of the implementing parties to listen, understand and address the needs, concerns, and perspectives of stakeholders in the identification ecosystem. In Switzerland, a proposed digital identity verification system was subjected to a referendum, steered by civil society groups,[11] despite parliamentary approval in 2019.[12] During the referendum, a resounding

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[8] UN Legal Identity Agenda, 'Background,' https://unstats.un.org/legal-identity-agenda/, accessed 25 May 2023.

[9] The World Bank Group - Identification for Development (ID4D) Initiative, 'Primer on Biometrics for ID Systems (Primer),' https://id4d.worldbank.org/id-biometrics-primer, accessed 25 May 2023.

[10] THALES, 'Legal Identity: A Proxy for Inclusion,' https://www.thalesgroup.com/en/markets/digital-identity-and-security/government/inspired/legal-identity, accessed 24 May 2023.

[11] Swiss Politics, 'Data security issue causes concern over Swiss digital ID,' https://www.swissinfo.ch/eng/data-security-issue-causes-concern-over-swiss-digital-id/46300224, accessed 19 June 2023.

[12] Swiss Politics, 'Digital identity scheme shot down by voters over data privacy concerns,' https://www.swissinfo.ch/eng/digital-identity-scheme-faces-scepticism-around-data-privacy/46399636, accessed 28 May 2023.

64.4% of voters rejected the solution. At the core of this mass rejection were end-users concerns over the sovereignty, safety, and protection of users' data, noting that the digital ID system was a joint initiative between the state and a private infrastructure entity.

Underlying these concerns was citizenry mistrust in private companies. This mistrust is replicated across jurisdictions irrespective of the maturity of legal frameworks or public awareness of privacy and data protection safeguards. Notably, citizens mistrust is often used as political ammunition by opposition parties in attempts to not only discredit identification initiatives, but also undermine the ruling party's credibility. This point is underscored in the CAR case study below.

In Kenya, while the Court permitted the roll out of the country's digital ID system, the National Integrated Identity Management System (NIIMS), it rejected the collection by the state of DNA and GPS data for identification purposes on grounds of this being "intrusive and unnecessary."[13] Further, the Court only permitted NIIMS on the condition that it would enact an 'appropriate and comprehensive regulatory framework' compliant with the Constitution of Kenya.[14]

While both governments have taken steps to re-deploy their respective identity solutions, stakeholders have cautioned them to avoid replicating the mistakes of the past.[15] In Switzerland, the government rebranded its proposed system, and actively engaged a broad set of stakeholder groups through the public consultation process. This was driven by a desire to (i) clearly outline and describe the e-ID solution, its goals and objectives, (ii) address data protection concerns raised during the referendum, and (iii) underscore the centrality of an ID infrastructure rooted in trust.[16] Kenya's government has co-opted the support of some civil society groups in the design of its revamped digital ID system, amidst

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[13] *Nubian Rights Forum & 2 others v Attorney General & 6 others; Child Welfare Society & 9 others* (Interested Parties) [2020] eKLR, http://kenyalaw.org/caselaw/cases/view/189189/, accessed 5 June 2023.

[14] *Nubian Rights Forum & 2 others v Attorney General & 6 others; Child Welfare Society & 9 others* (Interested Parties) [2020] eKLR, http://kenyalaw.org/caselaw/cases/view/189189/, accessed 5 June 2023.

[15] Access Now, 'Activists urge Kenya not to repeat mistakes of Huduma Namba in new digital ID plan,' https://www.accessnow.org/press-release/kenya-digital-identity-systems/, accessed 28 May 2023.

[16] Der Bundesrat, 'E-ID: Bundesrat eröffnet Vernehmlassung,' https://www.admin.ch/gov/de/start/dokumentation/medienmitteilungen.msg-id-89515.html, accessed 28 May 2023. See also: Swiss Politics, 'Proposal launched for use of safe digital ID,' https://www.swissinfo.ch/eng/politics/new-proposal-launched-for-use-of-safe-digital-id/47712808, accessed 29 May 2023.

calls from other CSOs for transparency, inclusivity, and a human-rights-centered approach in the design and implementation of the digital ID system.[17]

This report recognizes the inevitable and increasing adoption of biometric technologies in foundational ID systems by governments. We reiterate calls to international institutions and governments to involve and engage *all* stakeholders in the ID ecosystem *prior to the implementation* of ID systems, and only *if* it is determined that biometric adoption is required and appropriate. This engagement should be an *ongoing process*, rather than a tick-box exercise that is prioritized during the public participation process provided in law.

We urge the adoption of a holistic and inclusive approach to the implementation of foundational ID systems which are technologically sound, socially responsible, ethical, legally complaint, politically supported, and aligned with the interests of all stakeholders involved. This requires:

- a comprehensive understanding of the diverse perspectives, concerns, and needs of stakeholders in foundational ID systems;
- risk identification and mitigation, with a focus on potential or actual social, legal, political, and ethical implications;
- rights-fulfilment, particularly the rights to identity, nationality and citizenship, and the right to privacy and data protection;
- prioritizing 'ideals' in foundational ID systems, such as public trust.

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[17] Access Now, 'Activists urge Kenya not to repeat mistakes of Huduma Namba in new digital ID plan,' https://www.accessnow.org/press-release/kenya-digital-identity-systems/, accessed 28 May 2023.

Methodology

Table 1: Research Topic and Research Question (by researcher)

Research Topic	Rebuilding Identification and Stakeholder Engagement in the Central African Republic (CAR)
Research Question	How can stakeholders in the CAR be engaged in the implementation of foundational ID systems?

To explore how stakeholders can be engaged as the CAR government rebuilds its foundational ID systems (research purpose), this report adopted a qualitative approach using mixed methods, including a desk review of relevant studies and reports and the case study research design.

A comprehensive literature review of existing research and publications related to stakeholder engagement in the implementation of biometric identification systems generally, and in CAR, specifically, was conducted. The literature review provided an understanding of the existing knowledge and best practices in this area. The case study research design was employed to ground the argument for more inclusive stakeholder engagement in identification processes and systems, relying on a real-world stakeholder concern in the CAR.

The data collected from the literature review and case study was analyzed to identify themes and patterns related to stakeholder engagement in the implementation of biometric identification systems. Based on the analysis of the data, recommendations were developed for how stakeholders could be effectively engaged in foundational identification systems.

Research Limitations

This research report was limited by the following:

- **Inability to engage CAR stakeholders:** due to the ongoing security challenges in the CAR, this report was unable to benefit from the insights of stakeholders dealing with the implementation of CAR's identification system. Specifically, we were unable to engage citizens, government representatives and representatives of 'Al Madina.'

🞣 **Assumptions in sources**: this report relied on publicly accessible material, with the reviewed studies and reports containing the assumptions of respective authors in their individual and professional capacities.

Glossary

Biometrics	A measurable physical characteristic or personal behavioural trait used to recognize the identity, or verify the claimed identity, of an applicant. This report details the collection of biometrics in CAR, namely fingerprints.[18]
Stakeholders	A person, group, community, or organisation who/which are impacted by, or can influence, the implementation of an identification project.[19]
Stakeholder Engagement	The process of interacting with and involving a person, groups, communities, or organisations who may be affected by an ID policy, program or project.[20]
Stakeholder Inclusion	The active participation and representation of stakeholders in ID decision-making processes. An implementing entity must involve diverse stakeholders (e.g., persons with disabilities, women, low-income individuals) who are at risk of exclusion or marginalisation during stakeholder consultations.[21]

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[18] NIST, 'Glossary – Biometrics,' https://csrc.nist.gov/glossary/term/biometrics, accessed 3 February 2023.

[19] Global Infrastructure Hub, 'Stakeholder Identification, Engagement and Empowerment,' https://inclusiveinfra.gihub.org/action-areas/stakeholder-identification-engagement-and-empowerment/#foot-ref-10, accessed19 May 2023.

[20] *Ibid.*

[21] *Ibid.*

Results/Analysis: Identification Documentation and Stakeholder Engagement in the CAR

As of June 16, 2023, the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) reported that a situation of "persistent insecurity… exacerbated by the long-lasting conflict and the ongoing conflict in Sudan" remains in the CAR.[22] The OCHA further reports that "one in five Central Africans is either an IDP or a refugee in neighbouring countries."[23] Despite this, the CAR was selected as a case study for examination because of its efforts to rebuild its national identification systems, amidst a humanitarian identity-related crisis rooted in what it means to be '100% Central Africa.'[24]

Prior to the 2013 crisis that led to the destruction of the CAR's card production facility and equipment, citizens could obtain national ID cards by mainly presenting their birth certificate. This is tied to the national position that identity, and consequently citizenship, is established through birth registration and the provision of a birth certificate. National ID cards are issued by the Ministry of Interior, according to Law 60-164 (1960, as amended in 1962 and 1964).[25]

In 2006, citizens' personal and biometric data, namely fingerprints, was collected for purposes of issuing a polycarbonate ID, which material is allegedly tamper-proof. From 2014 to date, individuals are issued a *récépissé*, a provisional ID permit with a photo of the ID applicant, but without fingerprint features, which must be renewed.[26]

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[22] Relief Web, 'Central African Republic: Situation Report,' https://reliefweb.int/report/central-african-republic/republique-centrafricaine-rapport-de-situation-16-juin-2023, accessed 16 June 2023.

[23] United Nations, 'CAR Humanitarian Situation – OCHA,' https://www.unognewsroom.org/story/en/1814/car-humanitarian-situation-ocha/5465, accessed 6 June 2023.

[24] Relief Web, 'I Am 100% Central African: Identity and Inclusion in the Experience of Central African Muslim Refugees in Chad and Cameroon,' https://reliefweb.int/report/central-african-republic/i-am-100-central-african-identity-and-inclusion-experience-central, accessed 7 June 2023.

[25] 'The law was amended twice—in 1962 (Law 62-345) and in 1964 (Law 64-35).' ID4D, 'Country Diagnostic – CAR,' https://documents1.worldbank.org/curated/en/917381634623050532/pdf/ID4D-Country-Diagnostic-Central-African-Republic.pdf, accessed 7 June 2023.

[26] ID4D, 'Country Diagnostic – CAR,' https://documents1.worldbank.org/curated/en/917381634623050532/pdf/ID4D-Country-Diagnostic-Central-African-Republic.pdf, accessed 7 June 2023.

The World Bank observed that the 2013 crisis led to the "destruction of an estimated 60 to 80 percent of identity or identity-related records held across the country outside Bangui by the ministries of interior, justice, and health. **A loss of this magnitude has not been suffered in any country ever as far as the World Bank Group is aware**."[27] This profound observation, coupled with reflections from the interviewee below, cements the reality that effective foundational ID systems rely on political stability for their appropriate and inclusive development and implementation, practical usage, retention and storage, including for archival purposes.

An interviewee observes that political instability in the CAR has negatively impacted the development of digital infrastructure in the country, resulting in a lack of basic services. The respondent further explains that civil society stakeholders have the local capacity to engage the government on the identification topic, but that this is constrained by financial and technical challenges. This signals that the CSOs' local knowledge and expertise on the national ID topic may not be integrated into the rebuilding of CAR's ID system.

> *"The Central African Republic has experienced severe political instability, which impacts the way people use digital tools. There is no infrastructure for basic services because the cost is very high. We already have digital passports, but they are not fully digital because you still must carry physical documents, and the same goes for identity cards."*
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> *As civil society stakeholders, we are facing many issues. For example, even if we can mobilize and sensitize the government on these subjects in a broad way, skipping the authorities in charge of the digital area in our country, we still need technical and financial support to engage and talk about these issues in CAR."*
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> *(ZR, Association of Central African Bloggers, March 2023)*

Case Study: The 'CCS' and 'Al Madina' Affairs

This case study underscores the importance of the CAR government engaging local stakeholders prior to the implementation of biometric identification systems. It details resistance from various stakeholders, including government officials with public

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[27] *Ibid.*

procurement mandates, the police, civil society actors, and end users. This case study is restricted to the period between 2016 and 2023.

ID Contracting (2016 - 2017): Centrafrique Carte System (CCS)

In September 2016, a public-private partnership (PPP) agreement was signed, and later withdrawn, between the Centrafrique Carte System (CCS), a subsidiary of the Ivoire Cartes Systèmes (ICS), and the Central African Republic. The ICS is a provider of services and technology in the field of securing sensitive documents and identification.[28] CCS notes that its PPP proposal was restricted to the provision of "technological solutions for securing administrative documents, identification and traceability of goods and people, with a view to modernizing and revitalizing the Central African administration."[29]

In the lead up to the withdrawal of CCS' contract and the subsequent award to 'Al Madina,' CCS' compliance with the CAR's public procurement laws during the tendering process was queried in 2017. Allegedly, CCS had compromised the CAR's current president, H.E. President Faustin-Archange Touadéra "to grant them the national identity card market in violation of the constitution."[30]

The CCS, through its General Manager Ephrem Dominique Yandoka, challenged the veracity of these statements, noting that attempts to discredit the reputation of CCS was erroneous and politically motivated. The General Manager further reassured Central Africans about the security of CAR's administrative ID documents, noting that documentation files would be held by the CAR state "because it is the sovereignty of the State."[31] CCS' contract was eventually withdrawn and awarded to Al Madina.

> *"I was given the pretext that I would have to file again when a new call for tenders is launched. But this was never the case and I later learned that the contract had been entrusted to Al Madina. It's just shocking,"*

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[28] Ivoire Cartes Systèmes, 'Monétique, Sécurisation de Documents, Identification,' https://ics.ci/, accessed 28 May 2023.

[29] Corbeau News, 'Central African Republic: CCS CEO Dominique Yandoka rejects allegations on the award of identity card management contracts,' https://corbeaunews-centrafrique.org/centrafrique-le-dg-de-ccs-dominique-yandoka-rejette-les-allegations-sur-lattribution-de-marche-de-gestion-des-cartes-didentites/, accessed 19 June 2023.

[30] *Ibid.*

[31] *Ibid.*

ID Contracting (2019 - 2023): Al Madina

Al Madina, a registered Omani company operated by a Lebanese management firm, holds multiple contracts for the production and issuance of identification documents in the CAR.[33] The company has won contracts for the manufacture of CAR's national IDs, biometric passports, drivers' licenses, and vehicle registration documents. Al Madina's current foothold effectively translates to a monopoly over the CAR's identity market.

The researcher was unable to confirm when exactly Al Madina was awarded the ID receipt contract, but news sources affirm that Al Madina was charged with the preparation of the *récépissé* as early as 2013, whereas others report a contract being awarded to Al Madina in 2019.[34]

In 2020, the former Minister of Public Security, Henri Wanzet-Linguissara, is reported to have confirmed that "*over fifty companies had applied for this lucrative and strategic contract, but this was awarded to Al Madina… since the… company… had already proved its worth to us, we entrusted it to them.*"[35] This statement signals that public procurement processes for the rebuilding of CAR's ID system were not followed, effectively stripping the processes of fairness, transparency, and accountability (*see table 2 below for a written objection by a government entity*).

In the CAR, various stakeholders, including those in government, continue to resist the state's identification rebuilding efforts, with the Al Madina contract award being located at the center of this unease (*see table 2 below for a summary of stakeholders' resistance efforts*). The core issues raised by stakeholders include:

- **Centralized Decision-Making:** The biggest challenge observed during the analysis of public sentiments in news sources is the ongoing centralization of decision-making

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[32] Jeune Afrique, 'Central African Republic: the identity document market at the heart of a conflict between government, police and civil society,' https://www.jeuneafrique.com/809210/societe/centrafrique-le-marche-des-documents-didentite-au-coeur-dun-conflit-entre-gouvernement-policiers-et-societe-civile/, accessed 24 March 2023.

[33] Africa Intelligence, 'Central African Republic: Lebanese firms battle over passport contract,' https://www.africaintelligence.com/central-africa/2021/07/07/lebanese-firms-battle-over-passport-contract,109678254-art, accessed 25 March 2023.

[34] *Ibid, n, 32*.

[35] *Ibid.*

between some government entities and one private sector entity without involvement of citizens. Notably, this ongoing failure to integrate public participation into the implementation process reveals the government's indifference to creating meaningful spaces for dialogue on an issue of national importance.

- ❖ **Impact – No transparency and accountability in identification rebuilding processes:** Activists have denounced the government for failing to integrate transparency and accountability into its rebuilding processes. This is informed by the award of the national ID contract to Al Madina despite recorded objections on grounds of non-compliance with procurement laws (*see table 2 below*), coupled with the fact that the company has a monopoly over CAR's identity market. Illustratively, in September 2022, local media reported that the costs of issuing the national identity card do not appear in the state's revenues. This has led to the conclusion that the management of funds generated by Al Madina are not subject to public accountability or oversight, despite their collections being generated from CAR citizens.[36]

- **Foreign Corporations Control of Locals' Identities:** Local activists are concerned about the delegation of the ID prerogative, which impacts national sovereignty, to a foreign company.[37]

- **Cost:** The cost of the CAR national ID has been a bone of contention, with stakeholders noting that price increments violate the fixed of CFA Francs 4,500 (USD 7.5) prescribed in the Finance Law.

  - ❖ In 2019, reports emerged that Al Madina sought to impose a fee of CFA Francs 15,000 (USD 25) for an ID document with 5 years-validity, but this proposal was rejected. In October 2020, the Ministry of Public Security issued a decree increasing the cost of the national ID to CFA Francs 6,750 (USD 11.2), which was challenged by stakeholders for violating the Finance Law. In May 2022, civil society

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[36] Le Tsunami, 'Centrafrique : les frais d'établissement de la carte nationale d'identité n'apparaissent pas dans le tableau des recettes de l'Etat,' https://letsunami.net/centrafrique-les-frais-detablissement-de-la-carte-nationale-didentite-napparaissent-pas-dans-le-tableau-des-recettes-de-letat/, accessed on 23 March 2023.

[37] RFI, 'Centrafrique: Al Madina, la société qui pose question à Bangui,' https://www.rfi.fr/fr/afrique/20200821-centrafrique-al-madina-soci%C3%A9t%C3%A9-nassour-carte-identite-papiers, accessed on 24 March 2023.

groups decried Al Madina's price hike to CFA Francs 6,000 - 6,500 (USD 10-11), which allegedly violated the Finance Law. [38]

Table 2: Summary of Stakeholders' Resistance

Year	Explainer	Protesting Stakeholder
2018, August	Written objection to Al Madina's impending contract for failure by the government to adhere to public contract laws. Despite this, the CAR government proceeded with the contract award.[39]	Director General (DG), Public Procurement, Ministry of Finance and Budget
2019, July	Public, physical demonstration against Al Madina being awarded multiple national identification contracts at the Prime Minister's Office.[40]	Police officers
2020, August	Filed applications before Administrative Court to annul an inter-ministerial decree raising the prices of residence permits and national identity cards. Argued that these price hikes were contrary to the Finance Law price of 4,500 CFA francs.[41] On September 4, the Court ordered the suspension of the decree, leading to its repeal.	Group of Deputies
2022, May	(GTSC) announced a large-scale action in Bangui, CAR's capital city, against Al Madina company for illegally increasing the cost of the national ID cards.[42]	Civil society working group (GTSC)

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[38] See: Jeune Afrique, 'Central African Republic: the identity document market at the heart of a conflict between government, police and civil society,' https://www.jeuneafrique.com/809210/societe/centrafrique-le-marche-des-documents-didentite-au-coeur-dun-conflit-entre-gouvernement-policiers-et-societe-civile/, accessed 24 March 2023. Corbeau News, 'CAR: national identity card, the GTSC issues a new ultimatum to the Lebanese government and society Al Madina,' https://corbeaunews-centrafrique.org/rca-carte-nationale-didentite-le-gtsc-lance-un-nouvel-ultimatum-au-gouvernement-et-a-la-societe-libanaise-almadina/, accessed 7 June 2023.

[39] *Ibid, n. 38.*

[40] See: Centra Afrique Sur 7, 'RCA: affaire Al Madina, ce que l'on ignore,' http://centrafrique-sur-7.over-blog.com/2020/10/rca-affaire-al-madina-ce-que-l-on-ignore.html, accessed on 24 March 2023. Also: Jeune Afrique, 'Centrafrique : le marché des documents d'identité au cœur d'un conflit entre gouvernement, policiers et société civile,' https://www.jeuneafrique.com/809210/societe/centrafrique-le-marche-des-documents-didentite-au-coeur-dun-conflit-entre-gouvernement-policiers-et-societe-civile/, accessed on 24 March 2023.

[41] Corebeau News, 'RCA : carte nationale d'identité, le GTSC lance un nouvel ultimatum au gouvernement et à la société libanaise Almadina,' https://corbeaunews-centrafrique.org/rca-carte-nationale-didentite-le-gtsc-lance-un-nouvel-ultimatum-au-gouvernement-et-a-la-societe-libanaise-almadina/, accessed 24 March 2023.

[42] CNC, 'RCA : carte nationale d'identité, le GTSC lance un nouvel ultimatum au gouvernement et à la société libanaise Almadina,' https://corbeaunews-centrafrique.org/rca-carte-nationale-didentite-le-gtsc-lance-un-nouvel-ultimatum-au-gouvernement-et-a-la-societe-libanaise-almadina/, accessed on 24 March 2023.

Integrating Stakeholder Engagement into Lessons Learned from CAR

The successful implementation of identification systems and initiatives requires the incorporation of a multiplicity of voices and perspectives through active and continuous engagement with multiple stakeholders. The engagement of a broader, wider stakeholder base, and the ability of governments to reconceptualize the different roles and responsibilities of each stakeholder depending on a country's local context and social and political realities, is critical in physical and digitized identification systems.[43] The engagement of stakeholders should not be viewed as a tick-box exercise, as this approach can lead to stakeholder pushback against non-inclusive and ineffective engagement efforts.[44]

The report details three key lessons that have been derived from the CAR's ongoing failure to engage and include stakeholders as it rebuilds its identification systems. Each lesson is supplemented with a practical breakdown documenting the stakeholder engagement gap and offers recommended solutions for the gap to be addressed, informed by international best practices.

Lesson 1: Rebuilding an exclusionary identification system will continue to generate pockets of local resistance in CAR

The World Bank categorizes five stakeholders in "government-recognized ID systems based on three different roles: establishing, maintaining or using an ID system."[45] The stakeholders include (1) individuals, (2) governments, (3) private sector, (4) civil society, (5) international organizations and development partners (*see Figure 1 below*). We note that this categorization is rigid due to its failure to recognize the capacity of people to move beyond

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[43] Council of Europe - Consultative Committee of the Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data Convention 108, 'Digital Identity Draft Guidelines,' https://rm.coe.int/t-pd-bur-2021-2rev-draft-digital-identity-guidelines/1680a2d607, accessed 2 June 2023.

[44] Access Now, 'The Jamaica NIDS digital identification program: a cautionary tale,' https://www.accessnow.org/jamaica-nids-digital-id/, accessed 2 June 2023.

[45] World Bank, 'Practitioner's Guide – Stakeholders and Roles,' https://id4d.worldbank.org/guide/stakeholders-and-roles, accessed 7 May 2023.

the recipient or user roles to stakeholders capable of shaping and influencing the design and implementation of identification systems, beyond participating in public consultations.

Guided by the case study findings and the desk review, we categorized the CAR's current stakeholder base into two actors, namely:

1. ***Political Actors*** *– refers to high-ranking interests within the CAR government that control the identity system from system design to implementation. These actors are keen to continue monopolizing CAR's identity system for unknown interests; and*

2. ***Private Actors*** *– refers to a set of actors/stakeholders with influence on high-ranking decision-makers in the CAR's central government.*[46]

In effect, CAR's current stakeholder engagement approach can be described as 'exclusionary,' rather than one centered on inclusivity. For instance, the case study above documents the current centralized decision-making structure as a barrier to the integration of more diverse voices. In fact, we make the case that the CAR government hasn't initiated any sort of engagement process with stakeholders, as this requires a decentralized and ongoing process of understanding diverse perspectives and needs and addressing concerns.

The case study above demonstrates that pockets of resistance to the ID rebuilding efforts will continue to spring up, including from government. This is caused by the government's ongoing insistence on siloed negotiations and partnerships with Al Madina to the exclusion of other critical stakeholders.

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[46] Researchers own categorization based on desk review.

Resource: Stakeholders

Role Stakeholders	Main activities	Main objectives
End-users: the subjects of the identity system		
People Residents, citizens, beneficiaries, clients, etc.	- Register in the identity system - Use credentials and proof of identity to access rights and services - Update data as needed - Control and monitor their data	- Accessibility - User-friendliness and control - Transparency and consent regarding the use of data - Privacy and data protection
ID Providers: Create and manage identities		
Government Agencies Basic: identity authorities, registrars, etc. Functional: electoral commission; social welfare, health ministries; tax authorities, etc. **Private companies** PPP partners, cell phone operators, financial service providers, online trading platforms, private healthcare providers, credit rating agencies, etc. **International organizations** UNDP, UNICEF, UNHCR, WFP, etc.	- Register people in the identity system - Issue and manage accreditations - Manage and update identity information - Provide authentication/verification services at different assurance levels - Raise awareness, conduct public consultations and address grievances.	- Create accurate and reliable identities - Provide services efficiently and effectively - Protecting data from abuse and breaches - Preventing fraud - Reduce operating costs
Relying parties: Relying on identity systems provided by others to identify/verify/authenticate end users		
Government Agencies Passport office, electoral commission, tax administration, social welfare agency, etc. **Private companies** Mobile network operators, financial service providers, online trading platforms, private healthcare providers, credit rating agencies, etc.	- Use identity provider platforms, credentials, and services to authenticate and/or verify the identity of end users. - Allow people to access specific rights or services	- Identify and authenticate individuals with an appropriate level of assurance for the transaction. - Provide services efficiently and effectively - Preventing fraud - Reduce operating costs
Facilitators: Support the development, implementation and monitoring of the identity system.		
Regulatory bodies Government oversight and enforcement agencies	- Promulgate and enforce digital identity regulations and trust frameworks	- Data protection and privacy - Consistent identity management - Responsibility
Standards bodies and trust frameworks Governmental and international organizations, private identity organizations and associations	- Provide technical and data standards - Building trust - Supporting information security and cybersecurity	- Create reliable, vendor-neutral and technology-neutral identity systems. - Facilitate interoperability - Build trust between identity stakeholders
Development and local partners Donor agencies, NGOs, community-based organizations	- Provide funding and technical assistance for the design and implementation of the identity system. - Assist individuals in accessing and using identity systems and related services. - Advocating for inclusive and reliable identity systems	- Supporting client objectives - Building local capacity - Ensure accountability to users

Figure 1: Stakeholders and Roles (ID4D, World Bank)[47]

Recommendation

Table 3: Stakeholder Identification and Participation

Method for Stakeholder Engagement
• **Conduct a stakeholder analysis:** detail the CAR's identification landscape, and identify key stakeholders, their needs, concerns, and perspectives.
• **Establish dialogue channels:** the government could consider inviting stakeholder groups to meetings or workshops to provide stakeholders with a platform to express their needs and concerns, ask questions, and contribute to decision-making processes related to ID processes. ❖ To elevate this engagement, the CAR government should consider forming a **multistakeholder advisory group.** This can consist of the five key stakeholders identified above, including those who are at risk of exclusion or marginalisation, including persons with disabilities, women, low-income individuals, amongst others.

Lesson 2: ID Processes must be grounded in local context considerations to support rights fulfilment

ID processes in the CAR, from contracting to issuance of the national ID, remains a highly sensitive topic, that is governed by socio-economic, political, legal, and cultural dynamics.

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[47] *Ibid, n. 44.*

The CAR continues to tackle an identity challenge grounded in what it means to be '100% Central Africa.' Critically, ID processes that empower can be a great tool for social cohesion and the inclusion of individuals and communities.

Recognizing these local context sensitivities is crucial to ensure effective engagement and avoid potential conflicts. The CAR government must, during its stakeholder engagement, remain cognizant of the intersection between ID processes and other areas such as governance, resource allocation and management, and power dynamics. These are integral to the promotion of inclusive ID implementation and transparency.[48]

Under international law, states must minimize direct and indirect barriers preventing individuals' timely access to identification documents. The Principles on Identification for Sustainable Development categorically affirm that individuals' fulfilment of their rights and access to services must never be barred by the cost of obtaining ID credentials.[49] Critically, fees charged must be (a) lawfully grounded in law for legal certainty, '(b) reasonable, taking into account socio-economic capabilities of the local populace, (c) proportional to costs incurred, and (d) transparent to the public.'[50]

In CAR, the fee charged to obtain a national ID has created a battle ground, pitting the government and Al Madina on one side of the proverbial fence versus the deputies, end users, and civil society actors on the other side. The former entities have, since 2019, pushed for upward pricing adjustments that fall outside the remit of the Finance Law, whereas the latter continue to resist these hikes on grounds of illegality and impracticality in a country where nearly "71% of the population is living below the international poverty line (USD 1.90 per day...)."[51]

Recommendation

Table 4: Risk Identification and Rights Fulfilment

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[48] Nishant A & Irina B, 'Responsible innovation for digital identity systems,' https://www.cambridge.org/core/journals/data-and-policy/article/responsible-innovation-for-digital-identity-systems/F21D5B33C5639357466867941D0EFF00, accessed 15 May 2023.

[49] World Bank, 'Principles on Identification for Sustainable Development,' https://documents1.worldbank.org/curated/en/213581486378184357/pdf/Principles-on-Identification-for-Sustainable-Development-Toward-the-Digital-Age.pdf, accessed 15 May 2023.

[50] *Ibid.*

[51] World Bank, 'The World Bank in the Central African Republic,' https://www.worldbank.org/en/country/centralafricanrepublic/overview#:~:text=The%20Central%20African%20Republic%20remains,%2C%20in%20terms%20of%20PPP), accessed 19 June 2023.

Method for Stakeholder Engagement
• **Conduct comprehensive risk identification and mitigation analyses:** detail all barriers, including cost, with the goal of minimising these risks for individuals' rights fulfilment. The government can host dialogue and consultation sessions with stakeholders to identify their respective concerns and challenges for risk mitigation.
❖ Critically, risk mitigation requires stakeholders' compliance with national laws, including public procurement and prescribed ID fees.

Lesson 3: Ensuring data sovereignty in ID processes is integral to fostering public trust during data collection/processing

"We must entrust our data to a reliable structure, it is the sovereignty of the Central African Republic."[52]

In the CAR, stakeholders have expressed their concern over one private company being entrusted with the issuance of all identification documents in the country. Stakeholders have also expressed concern over the safety and protection of their personal data, a concern which was echoed by the Swiss public in the lead up to the 'no' referendum on the country's proposed digital identity verification system (*see Introduction*).

The concept of data sovereignty in the ID context mandates states to subject the collection, processing, sharing, and storage of citizens' personal information to national laws. This places an obligation on states to determine who has *control* and *ownership*, but this is underscored by the fact that the state retains sovereignty over the data.[53] We note that the CAR government has placed unconditional trust in Al Madina and has not addressed stakeholders' control over the protection of their personal data. This has the potential to impact public trust in the rebuilding efforts being undertaken.

Recommendation

Table 5: Data Sovereignty

Method for Stakeholder Engagement

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[52] RFI, 'Central African Republic: Al Madina, the society that raises questions in Bangui (rfi.fr),' https://www.rfi.fr/fr/afrique/20200821-centrafrique-al-madina-soci%C3%A9t%C3%A9-nassour-carte-identite-papiers, accessed 22 June 2023.
[53] SEON, 'What is Data Sovereignty,' https://seon.io/resources/dictionary/data-sovereignty/, accessed 21 June 2023.

- **Conduct privacy assessment to evaluate data processing activities by Al Madina:** evaluate the risks and implications of these activities, and involve stakeholders, including lawyers, privacy professionals, with a vested interest in data sovereignty and data protection.

- **Publish transparency material for stakeholders' scrutiny and engagement:** detail Al Madina's' and the CAR government's data handling procedures, data processing activities, and associated security and privacy safeguards, and avail these for public scrutiny.

Conclusions and Recommendations

A clear signal of stakeholder discontentment with the government's management of its national ID process is multiple reports of pushback and resistance by local stakeholders. This report affirms that the government in the CAR is not involving local stakeholders as it continues to rebuild its national ID systems, with pushback being documented across most stakeholder levels, including within the government itself.

Based on this, the report stresses the importance of governments, including the CAR government, to involve and engage *all* stakeholders in its identification ecosystem *prior to implementation*. We urge the adoption of a holistic and inclusive approach to the implementation of foundational identification systems which are technologically sound, socially responsible, ethical, legally complaint, politically supported, and aligned with the interests of all stakeholders involved.

Based on this, the report proposes the following recommendations to the CAR government, civil society actors and researchers.

Recommendations

We urge the Government of the CAR to:

- Conduct stakeholder consultations with civil society organizations, human rights groups, technology companies, and other stakeholders to identify their concerns, needs, and priorities as it rebuilds its national ID system. This will enable the government to develop policies and programs that are responsive to the needs of all stakeholders.
- Adopt a participatory approach to the implementation of the identification system. This will involve engaging stakeholders throughout the process, from planning to implementation, and ensuring that their input is incorporated into the final product.
- Ensure that the implementation of national ID systems is transparent and accountable. This will involve:
    - ❖ publishing public-private partnerships contracts

- rigorously adhering to public procurements, resource management and reporting laws and requirements
- providing avenues for feedback and complaints
- establishing independent oversight mechanisms to monitor the implementation of the national ID system.

Civil Society

We urge CSOs in the CAR to:

- Challenge unlawful and unreasonable cost increments by the government of the CAR and Al Madina, leveraging the support of CAR Deputies, an ally in the resistance efforts.
- Continuously monitor the implementation of CAR's identification system by:
  - establishing a joint monitoring group bringing together CSOs and media to collaborate in the monitoring and assessment of the CAR's national ID system
  - prepare communications and reporting material to bridge information gaps in the CAR's ID ecosystem
  - leverage reporting mechanisms, such as the African Commission on Human and Peoples' Rights to raise concerns and risks about the CAR's national ID processes
- Advocate for the protection of data privacy, sovereignty, and security in the implementation of foundational ID systems. Specifically,CSOs should advocate for the enactment and implementation of a data protection law in the CAR.

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