Seizing the opportunity to improve the national digital ID system for Uganda

*In this document, we raise **5 urgent recommendations** that the Government should adopt to put Uganda on the path towards a digital ID system that centres inclusion, equity, privacy, transparency, and accountability. This is not intended to be an exhaustive list, but instead focuses on short-term, actionable recommendations that will help to concretely improve the Government's approach in the immediate term. We believe that these recommendations will help to ensure that the new ID system better fulfils its aims and includes all Ugandans*

In 2014, Uganda introduced its first national digital ID, the *'Ndaga Muntu,'* to provide unique identification for all Ugandans. Now, a decade later, as millions of ID cards are set to expire, the Government is planning a significant update of the national digital ID system. The National Identification and Registration Authority (NIRA) will soon begin a **mass enrolment and renewal exercise** to register all unregistered Ugandans, including children, and will introduce upgrades to the existing technological systems.

The nationwide mass enrolment and renewal process was set to run for 10 months beginning on 1st June 2024, but after several delays, NIRA now estimates that the process **will begin in late July**. This delay and lack of a clearly defined timeframe raise concerns about the limited time remaining to ensure that all Ugandans are included. This is especially important given that **millions** of Ugandans are not currently registered and many have errors in their records; the Executive Director of NIRA **recently stated** that 1 million people in the National Identity Register do not have fingerprints that can be matched. Additionally, the ID will be required to vote in the upcoming general election in 2026. A shortened enrolment and renewal period for the ID may result in fewer citizens being able to register to vote, increasing the risk of disenfranchisement, particularly among first-time voters and those in remote areas. Since the national ID is also increasingly necessary for **financial transactions**, social assistance, **education**, and many other areas of life, failing to register or renew national IDs may have significant consequences.

This postponement, however, presents an opportunity to incorporate stakeholder recommendations to enhance the effectiveness and inclusivity of the registration and renewal process, and to more proactively include civil society. As it finalises its **plans for the new system** and embarks on a new mass registration exercise, **the Government has a significant opportunity to build a more inclusive, equitable, and privacy-protecting digital ID system—a system that is trusted and that achieves its aims of fostering inclusion.** This would firmly align the Government with international discussions about **best practices for building digital public infrastructure**.

Drawing on **research** and past experiences with Uganda's existing national digital ID system, as well as incorporating lessons from other countries' experiences and **international best practices**, will be essential for improving the ID system and avoiding the repetition of prior challenges. Independent research conducted by civil society organisations, which **includes recommendations from those who are knowledgeable about the current system and the needs of our communities**, provides an invaluable resource that can not only improve outcomes, it can prevent costly missteps and duplications.

To avoid further entrenching the well-documented problems and weaknesses that have affected the current *Ndaga Muntu* system, **we recommend that in the next year, the Ugandan government should**:

1. Take steps to improve **communication and transparency** about plans for the new digital ID;

2. Proactively facilitate **participation**, particularly of vulnerable communities and of civil society organisations, in policy and design choices;

3. Conduct a comprehensive **Human Rights Impact Assessment** to identify risks arising from the ID system and the registration and renewal process, with a particular focus on interoperability and the mandatory national ID requirement;

4. Take steps to ensure that **marginalised and vulnerable groups are proactively included** in enrolment and renewal processes;

5. Put in place concrete plans for a **transition period** to ensure that no rights are violated as the Government works to introduce new digital components

These recommendations provide a starting point and are oriented towards practices and policies that should be enacted immediately. While the Government has a critical opportunity in the coming year to put in place reforms and safeguards that address the weaknesses and problems with the current national ID system, there is also a need for sustained engagement with affected communities and civil society, effective monitoring and evaluation, and a long-term commitment to identifying and remedying issues within the national digital ID system, in order to ensure that the next decade of the *Ndaga Muntu* will be more inclusive, safe, and human rights centric.

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*Recommendation 1: Take steps to improve **communication** and **transparency** about plans for the new digital ID*

We welcome the information NIRA has **already shared** publicly about the planned upgrades to the digital ID system. However, to improve public trust, and to maintain a strong working relationship with civil society organisations who play a crucial role in ensuring a system is inclusive and trusted, greater

openness and proactive communication about plans for the system are essential, beyond NIRA's **Frequently Asked Questions on Mass Enrolment and Renewal 2024** publication and *ad hoc* statements of the Executive Director. Improving transparency about the system and about NIRA's plans *before* the system is rolled out allows civil society organisations and communities to provide their expert input, and to correct any misconceptions about how groups can and will engage with the enrolment process or the system itself. More specifically, we recommend that:

1.1.   The Government should urgently set and communicate a new, clear timeline and share the new roadmap for the registration and renewal exercise, including by providing more information about its specific plans for enrolment;

1.2.   The Government should also share more information about the new ID system itself, including its technical components, to urgently increase transparency surrounding its plans. The Government should especially share more information with civil society organisations, who can then better provide feedback and collaborate to ensure that the system is as inclusive, equitable, and trusted as it could be;

1.3.   NIRA should proactively publish additional information about its plans and about the system not only on its website, but also making it available to the public through accessible mediums, such as radio spots, community meetings, and perhaps Twitter (X) Spaces events, to ensure that it can reach a broader audience and be accessible to hard to reach communities. Interactive sessions where communities can engage and ask questions would be especially helpful.

Following international best practice, the goal of the Government should be to **leave no questions unanswered**. Some of the key questions to be addressed regarding Uganda's new digital ID system, in the immediate term, are: why the system is being rolled out in this way rather than in another way; what are the specific purposes behind this system; what technology is being used, including which biometric technologies; what the enrolment process will look like; and what opportunities civil society organisations will have to engage with the Government about system design and enrolment processes.

Regarding the registration process specifically: while NIRA has commendably taken steps to include information about the registration and renewal process and the new ID within the FAQs document on its website, it should publish more detailed information about the process. Specifically, we recommend that:

1.4   In addition to publishing more information about the timeline, NIRA's plans, and the system itself, NIRA should also issue a new FAQ document prior to the commencement of the mass renewal and enrolment exercise. This FAQ document should provide clarity about the below aspects of NIRA's plans, and should be widely disseminated and shared with local communities.

Application Process Details: The FAQs document provides an outline of the application process, but more detailed steps and visual aids (such as flowcharts and example forms) could make it easier for applicants to understand the procedure. Additionally, the document does not specify the exact locations of the mobile enrolment sites, nor directions to help people to find enrolment

sites. Providing information about enrolment locations well in advance of the registration and renewal exercise will be critical for ensuring broad inclusion.

Of particular concern will be to communicate which information will be mandatory. NIRA has **stated** that it will add iris biometrics to the new ID, saying that "this will help address the challenge of persons whose fingerprint grooves have deteriorated," which includes over 1 million people who are currently registered—and which has especially affected older persons. But it is unclear if the collection of iris scans is mandatory as part of the registration or renewal processes or provided only for those who need an alternative form of biometric identification. The Government should be clear about what exactly is required from individuals engaging in registration or renewal and should clarify where people have the right to opt out.

Support for Special Groups: We appreciate the decision taken by NIRA to have designated enrolment centres for people in specialised facilities like barracks, prisons, and orphanages, as well as to take special measures to reach the elderly and those who cannot reach the parish due to illness. To ensure that these efforts are effective, more information on how these groups will be reached and what specific arrangements will be made for them should be shared in advance.

Correction Process: The FAQs document states that NIRA will allow people to correct errors on their IDs before they renew, but it does not provide a comprehensive guide on how to make corrections to existing information, the types of documentation required, nor the timelines for these corrections. It is important that the Government provide more clarity on this issue.

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*Recommendation 2: Proactively facilitate **participation**, particularly of vulnerable communities and civil society organisations, in policy and design choices*

Meaningful engagement with individuals and civil society organisations through public dialogue about the design of the new digital ID system will help to increase transparency and trust, and reduce the risk of exclusion. To ensure that the new ID system fulfils its aims, it will be important for NIRA to proactively seek input and feedback from community groups, civil society organisations, and especially vulnerable groups, to inform the policy and design choices shaping the new system. The **UN Development Program suggests** that citizens and civil society should be consulted on proposals for digital ID systems and that changes should be made in response to suggestions; governments should engage in "ongoing dialogue with the citizens and not just one time feedback."

We recommend that the Government:

2.1   Conduct country wide public awareness programmes to sensitise the public about the renewal process and their rights and responsibilities, to improve their ability to participate;

2.2.   Create opportunities for communities to provide suggestions about the enrolment and renewal process through dedicated channels for ongoing input;

2.3.   Create opportunities for communities and marginalised groups to give their input into design choices that are being made about the new ID system, such as through community meetings (in person and online) which are well-designed and interactive;

2.4.   Ensure that the views contributed by individuals and communities meaningfully shape and inform the development of the ID system;

2.5.   Create regular opportunities for civil society organisations to meet with NIRA and engage in ongoing dialogue about the ID system – for instance through monthly meetings;

2.6.   Ensure that civil society organisations' feedback and concerns about the ID system generally, and the enrollment and renewal processes specifically, are meaningfully taken into account and continually inform NIRA's approach;

2.7.   Enact Section 83(1)(a) of the Registration of Persons Act by establishing an Identification and Registration Committee to adjudicate over matters related to ID registration. This committee should provide a formal means for individuals to raise grievances, and to hold NIRA accountable for problems and shortcomings arising from the enrolment and renewal process;

2.8.   Establish other feedback mechanisms that allow individuals, communities, and civil society organisations to report any issues encountered during the enrolment and renewal process. The Government should also make significant efforts to proactively act upon this feedback, to continually improve the system.

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*Recommendation 3: Conduct a comprehensive **Human Rights Impact Assessment** to identify risks, with a particular focus on interoperability and the mandatory requirement*

According to the UN Development Program's Model Governance Framework for Digital Legal Identity Systems, best practices require that the legal and regulatory framework governing national digital ID systems **should entail a Human Rights Impact Assessment** (HRIA). Civil society organisations should be given a central role within HRIA processes – by themselves conducting the impact assessments, or by feeding in information and evidence to inform the process – and such evaluations should proactively incorporate the views and experiences of the most vulnerable and marginalised in society. The negative human rights impacts that are identified within the HRIA must be **addressed in an impact management plan, with the most severe impacts taking priority**.

Since HRIAs are usually carried out *before* a policy or law is implemented, they can be very helpful in supporting the government to improve the inclusivity and transparency of its policies, and to avoid any potential pitfalls. **Several countries already consistently conduct HRIAs to ensure that legislation and policy proposals align with their human rights obligations**. In Canada, the Minister of Justice assesses proposed laws for compatibility with human rights standards, and in Ghana, the Regulatory Impact Assessment (RIA) evaluates draft legislation for social equity and fairness. In South Africa, the government uses a **Socio-Economic Impact Assessment System (SEIAS)** to improve policy and law-making, as well as to reduce the regulatory and administrative burden placed on different groups in society. As the Ugandan government adopts a new generation ID system, it is imperative that it thoroughly apply a HRIA to existing laws and regulations regarding the digital ID framework, to ensure compatibility with international human rights obligations and to tangibly improve the system.

The Registration of Persons Act, 2015, envisages a national digital ID system that is used in a wide variety of contexts and services, including social services; that will be *mandatory* to access certain services; and that will be fully interoperable between different ministries, departments, and agencies, as well as the private sector. The scope of the HRIA should match the ambition of the digital ID system. Therefore, it should not only look at the impacts of NIRA's registration processes, but also the different use cases that the national digital ID system will be applied to in areas such as healthcare, education, and social protection. Civil society organisations and affected communities should be consulted in both the design and implementation of this impact assessment, and the result should be publicly available.

Although the Government has reached an advanced stage of planning for the national ID system, it is not too late to benefit from HRIA methods. Therefore, we recommend that the Government:

3.1. Develop a detailed plan to conduct a HRIA before or concurrently with the commencement of mass enrolment and mass renewal, and appoint a cross-departmental team to oversee the process. This plan should particularly identify known issues with the national ID system, including issues of equal treatment and non-discrimination for both citizens and non-citizens, access to social and economic rights, privacy and data protection, as well as free speech and expression;

3.2. Collect information about human rights impacts, allowing for the participation and consultation of affected groups. The Government should engage civil society organisations throughout this process to ensure that affected communities are being heard;

3.3. Based on the findings, create an impact prevention, mitigation, and remediation plan with clear lines of responsibility and accountability. This should also include a roadmap for periodic HRIAs throughout the duration of the mass enrolment and registration phase.

Recommendation 4: *Take steps to ensure that **marginalised and vulnerable groups are proactively included** in enrolment and renewal processes and can easily have any errors corrected*

Research has demonstrated that those who are most vulnerable are often those who are most affected by exclusion, errors, and any problems with the system. To ensure that the ID system is inclusive rather than further excluding vulnerable groups, we call upon NIRA to provide reasonable accommodation to address the specific needs of vulnerable populations, such as persons with disabilities and older persons, so they can participate in the enrolment and renewal processes effectively, and so that any necessary corrections can be made to quickly resolve any errors on their IDs. We recommend that NIRA should:

4.1.   Put in place measures such as accessible formats of information and alternative communication methods (beyond the SMS and email communication that NIRA is planning), to ensure marginalised groups can receive all necessary information;

4.2.   Ensure the physical accessibility of enrolment sites, to facilitate equitable access to enrolment and renewal processes for all individuals, including those with disabilities and those with limited mobility;

4.3.   Increase the number of enrolment centres and use mobile units to reach underserved areas quickly;

4.4.   Ensure that mobile kits remain accessible and functional over a continuous and extended period, to enable a proactive approach to enrolment and renewal;

4.5.   Ensure that processes for correcting errors on IDs are accessible, easy-to-use, do not impose burdens or costs, and are clearly communicated;

4.6.   Provide resources and information that will enable community leaders and civil society organisations to assist in mobilising communities and disseminating information about enrolment.

Recommendation 5: *Put in place plans for a **transition period** to ensure that individuals and communities do not experience harm as the Government works to introduce new digital components*

It is important to ensure that sufficient time and resources are dedicated to a transition period to account for changes brought about by the introduction of the new ID system. Especially as individuals and communities adapt to new technologies, engage with NIRA's new registration process, and overcome any barriers and challenges to enrolment, it may be some time before the new national ID system is fully universal and inclusive. While NIRA states that the previous mass registration process in 2014 **took four months**, significant **gaps in coverage and other challenges** with errors in the database continue years after the mass registration exercise.   Therefore, it is important to put in place plans for potential

challenges that may emerge during the upcoming mass enrolment and renewal process to ensure its success.

Mandatorily tying the ID to key services before universal coverage has been achieved, for instance, will generate significant harms. It will therefore be crucial to implement a transition period, during which special measures are taken to ensure that the introduction of the new ID system does not create exclusions and harms, including measures to ensure that gaps or problems with the national digital ID system do not lead to disruptions in essential services. We welcome the definitive **statement from NIRA** that "Citizenship NEVER expires" and the **confirmation** that NIRA is working with the Attorney General's Chambers to put in place measures to ensure that the public suffers no disadvantage because of the delays. But it will also be critical for NIRA to ensure that, throughout the new mass enrolment and mass renewal processes, and beyond, no one is denied access to rights and services because of problems with the national digital ID system. We therefore recommend that NIRA should:

5.1.   Define an appropriate transition period and engage all ministries, departments and agencies to develop transitional plans to reduce possible disruptions, and to ensure that any possible exclusions are prevented and mitigated;

5.2.   Clearly communicate to the public the length of this transition period, what measures have been put in place for this period, how to report potential issues with the mass enrolment and mass renewal transition period, and what remedies will be available to provide redress for any problems;

5.3.   Put in place specific measures to prevent exclusions, such as fully suspending the mandatory requirement of producing a national ID to access public services, and allowing alternative forms of identification for access to public services, for the foreseeable future – preferably until universal, equitable coverage is achieved;

5.4.   Establish inclusive, transparent, and accessible reporting and grievance redress mechanisms to inform the measures that are needed during this transitional period;

5.5.   Integrate assessments of the transition period into the human rights impact assessment process.

While these recommendations are intended to provide an immediate starting point, the policies and practices that we have set out here will also remain necessary in the longer term. In the coming year especially, it is important that the Government adopt reforms and safeguards that address the shortcomings of the current national ID system. But the need for ongoing and meaningful engagement with communities and with civil society organisations, the need for improved transparency, and the need to establish new mechanisms for feedback and accountability, are continuous requirements for any digital ID system to be inclusive, safe, and effective. Each of these recommendations should be enacted in the immediate term, but should also be seen as permanent elements of an improved approach to the digital ID system in Uganda.