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**MEMORANDUM ON:**

**THE BIRTHS AND DEATHS REGISTRATION (AMENDMENT) RULES, 2024  
AND  
THE REGISTRATION OF PERSONS (AMENDMENT) RULES 2024**

**Submitted to:**

Ministry of Interior and National Administration.  
State Department of Immigration & Citizen Services.

Submitted By:

**Kenya ICT Action Network (KICTANet)  
Amnesty International, Kenya**

**26 September 2024**

## Cover Letter

26 September 2024

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Attn: Amb. Prof. Julius Bitok, Ph.D., M.B.S.

**RE: Joint Memorandum on the Births and Deaths Registration (Amendment) Rules 2024 and the Registration of Persons (Amendment) Rules 2024**

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Greetings!.

We submit this memorandum jointly as Kenyan non-government and civil society organizations with expertise on human rights and Information and Communication Technology (ICTs). Our memorandum responds to the proposals in the Births and Deaths Registration (Amendment) Rules 2024 and the Registration of Persons (Amendment) Rules 2024.

We have included herein a matrix presentation that captures our concerns, and highlights our proposals on relevant provisions of each of the Regulations for your review and consideration. We would be glad to provide further input and perspectives on the Regulations, as and when required.

We look forward to your response.

Regards,

Kenya ICT Action Network (KICTANet)  
Amnesty International Kenya

*Joint Memorandum on: a) The Births and Deaths Registration (Amendment) Rules 2024; and b) The Registration of Persons (Amendment) Rules 2024*

## 1. The Births and Deaths Registration (Amendment) Rules 2024

Regulation	Provision	Issue/Concern	Proposal/Recommendation	Justification for Proposal
<b>Part III: Birth Registration Procedure</b>				
Rule 2	7. The register of births to be kept by a registrar in a compulsory registration area shall be maintained in loose-leaf and <b>electronic form</b> and shall contain the particulars required in <b>Form No. 1</b> in the Schedule to these Rules.	<p>The dual-system approach (both loose-leaf and electronic register of births may lead to inconsistencies between the physical and digital records, potentially causing errors or delays in accessing vital information.</p> <p>Additionally, rural areas with limited access to reliable internet or digital infrastructure may face challenges in maintaining electronic records</p>	<p>a) The provision should emphasize the use of the electronic registers as the primary system, with the loose-leaf format serving as a backup where necessary.</p> <p>b) The Ministry of Information, Communications, and the Digital Economy, through the State Department for ICT and Innovation should be tasked with investing in and strengthening digital infrastructure, particularly in rural areas, to support this transition.</p>	<p>Moving towards an electronic-first system aligns with global best practices for digital identification systems, offering greater accuracy and ease of access.</p> <p>However, given Kenya’s varied digital landscape, particularly in rural regions, it’s important to have a reliable backup and to improve infrastructure to avoid leaving any regions behind.</p> <p>Emphasis in the use of electronic registers also aligns with principle 2 of the <a href="#">World Banks Principles on Identification for Sustainable Development</a> which addresses removal of barriers to access and use.</p>
Rule 3	8(2) The registrar shall give the entry a <b>unique personal identification number</b> and affix such number to both copies of the entry.	While assigning a UPIN at birth helps in ensuring the integrity and continuity of a person’s records, there is a significant concern regarding data privacy and the potential for misuse and unauthorized access of	a) The regulation should include specific guidelines on data protection, detailing how UPINs will be stored, managed, and accessed, with strong safeguards to prevent unauthorized use.	<p>A UPIN is crucial for creating a cohesive and efficient record-keeping system, but without robust data protection measures, it could become a vulnerability.</p> <p>Additionally, when UPIs are used</p>

		<p>these UPINs if not securely managed.</p> <p>How will the UPIN be different from the current serial numbers given during registration of birth?</p> <p>How will the UPIN numbering be established to avoid duplication of numbers?</p> <p>Will the UPIN be used as a form of personal identification or this is for the purpose of record management?</p>	<p>b) There should be public education campaigns to inform citizens about the importance of their UPIN and how to protect it.</p> <p>c) Include the definition and purpose of UPIN in the regulations for clarity.</p>	<p>across different sectors, a breach in one system could compromise an individual's identity in all the other systems they interact with.</p> <p>For example, if the UPI is used both in healthcare and banking systems, a data breach in the healthcare system could lead to unauthorized access to the individual's financial information.</p> <p>The centralization of identity thus creates a single point of failure, exacerbating the impact of any security breach.</p> <p>Ensuring secure management and public awareness will build trust in the system and prevent potential misuse.</p> <p>Introduction of UPIN is not clear on how it will be different from the current serial number system and how it will enhance the management of the register. This needs to be clearly explained, defined and purpose clearly spelled out to avoid confusion, duplication and mismanagement. If the intent of using UPIN is for record management then the ministry needs to stipulate the security measure that will be used to guarantee its integrity and avoid cases of its duplication.</p>
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Rule 4	9. “The register of births to be kept by a registrar or Registrar-General in registration areas other than compulsory registration areas shall be a register book and <b>electronic register</b> in <b>Form No. 2</b> in the Schedule to these Rules.”	The dual system may pose challenges similar to those in compulsory registration areas.  Also, there is the concern of logistical feasibility of maintaining electronic records in areas with limited digital infrastructure.	<ul style="list-style-type: none"> <li>a) Similar to Rule 2, prioritize electronic records with physical backups as needed.</li> <li>b) The government should also ensure that non-compulsory areas receive adequate resources and training to maintain electronic records effectively.</li> </ul>	<p>The emphasis on electronic records promotes consistency across the country.</p> <p>Providing the necessary support to non-compulsory areas ensures that all regions can maintain accurate and up-to-date records, reducing disparities between urban and rural areas.</p>
Rule 5	10(2) “The registrar shall give the entry a unique personal identification number.”	Like Rule 3, this provision raises similar concerns about data security and privacy, particularly in areas where digital literacy may be low.	<ul style="list-style-type: none"> <li>a) The regulation should explicitly require that all registrars in all areas receive training on data security practices.</li> <li>b) A simple, user-friendly system should be developed to ensure that even those with limited digital skills can manage UPINs safely.</li> </ul>	<p>Training and user-friendly systems are essential to prevent data breaches and misuse, particularly in areas where digital literacy is low.</p> <p>This ensures the effectiveness and security of the UPIN system across the country.</p>
<b>Part IV: Death Registration Procedure</b>				
Rule 7	13. “The register of deaths to be kept by a registrar in a compulsory registration area shall be maintained in a loose-leaf and	Similar to the birth registration process, this dual system could create challenges in maintaining consistent records, particularly in areas with limited digital infrastructure.	<ul style="list-style-type: none"> <li>a) As with birth registration, prioritize the electronic system with physical records as a backup.</li> <li>b) Invest in digital infrastructure to support this in all areas.</li> </ul>	<p>Consistency in record-keeping is key to a reliable identification system.</p> <p>By focusing on electronic records, the government can ensure that death records are easily accessible, and accurate, reducing potential</p>

	<p><b>electronic form</b> and shall contain the particulars required in Forms Nos. 6 or 7 respectively in the Schedule to these Rules.”</p>			discrepancies.
Rule 8	<p>15(2) “The registrar shall give each separate entry a <b>unique personal identification number</b>. The same unique personal identification number issued at the registration of a person’s birth, shall be used as the unique personal identification number during the registration of death of the same person.”</p>	<p>Concerns regarding long-term data security and the potential for linking too much personal information to a single identifier</p>	<ul style="list-style-type: none"> <li>a) Introduce strong data protection measures, including encryption and access controls, to safeguard UPINs throughout a person’s life.</li> <li>b) Consider periodic reviews of the security protocols to address evolving threats.</li> <li>c) Introduce retention period rules after the demise of a person.</li> <li>d) Develop rules on how registrar will guarantee and ensure there is no duplication of UPIN.</li> </ul>	<p>Ensuring that UPINs are secure from birth to death is crucial to maintaining public trust in the system.</p> <p>By implementing stringent security systems, the government can protect citizens’ personal data and reduce the risk of identity theft or misuse.</p> <p><i>(See this blog for more reference: <a href="#">Navigating the Risks and Rewards of Digital ID Systems</a>)</i></p> <p>Introduction of retention period will address issues of capacity and concerns about the use of a person's record after their demise.</p>

Rule 9	18 “The register of deaths to be kept by a registrar in registration areas other than compulsory registration areas shall be a register book and <b>electronic register</b> in Form No. 8 in the Schedule to these Rules.”	<p>Similar challenges to those noted for birth records.</p> <p>There is also the issue of the capacity to manage these systems over long periods.</p>	<p>a) As recommended for birth registration, prioritize electronic records with physical backups.</p> <p>b) Provide ongoing support and training for officials in non-compulsory areas to ensure effective implementation.</p>	<p>Consistency in the approach to both birth and death registration ensures that records are maintained accurately across the board, supporting the integrity of the Maisha Number system.</p> <p>Providing adequate training and resources to all areas is key to its success.</p>
Rule 10	19(2) “The registrar shall give the entry a <b>unique personal identification number</b> . Provided that where a UPI number was given at the registration of a person’s birth or at any other time, the same UPI number shall be given during the registration of death.	<p>Concerns regarding data privacy and the potential risks of linking lifelong data to a single identifier.</p> <p>Lack of anonymization protocols for PII data.</p> <p>Lack of relevant policy to support and inform the amendment of this regulation.</p>	<p>Similar to Rule 8, enforce strict data protection protocols and consider introducing measures that limit the amount of information that can be linked to a UPIN to protect individual privacy.</p> <p>Develop and stipulate anonymization and encryption protocols of PII data as a safeguard measure against data breach.</p> <p>policies before rushing to amend the relevant laws.</p>	<p>Protecting personal data from misuse is critical, especially when dealing with information that spans a person’s entire life.</p> <p>Limiting data linkage and enhancing security measures will help mitigate the risks associated with the UPIN system.</p> <p>Data linkage is a good move as it aligns with the World Bank’s Principles on Sustainable digital identity and the guideline advanced by ID4Africa on linkability of Identity registers.</p> <p>As a best practice the consideration for the government would be to ensure anonymization of PII data together with the data protection protocol that guarantee protection of the data.</p>

				While the ministry through this amendment proposed to introduce a digital register. The amendments are not backed by the relevant policies which are critical for informing the technical and legal requirements of running and managing the register.
Rule 11	<p>The Principal Rules are amended in Rule 23 to read as follows—</p> <p>The following fees shall be chargeable L.N 15946/2024</p>	<p>The proposed new fees for:</p> <ul style="list-style-type: none"> <li>● Certification of Current Birth from Ksh 50 to Ksh. 200</li> <li>● Certification of Current Death Ksh 50 Ksh 200</li> <li>● Late registration of Birth Certificate Ksh 150 Ksh 500</li> <li>● Late registration of Death Ksh 150 Ksh 500</li> <li>● Re-registration of birth Ksh 90 Ksh 1000</li> </ul> <p>have a high potential of discriminating against persons from low income status and marginalized areas, due to their inability to afford the fees charged and access to the civil registration services.</p>	<p>Halt the proposed increase in cost for these 5 types of registration to allow adoption and uptake of registration of birth and deaths.</p> <p>Develop a sustainable pricing model for these 5 registration types.</p>	<p>As noted in the <a href="#">2021 Kenya Vital Statistics Report</a> cost of service and logistics plays a pivotal role in informing the rate of registration for birth and deaths</p> <p>The proposed pricing model has a high potential of discriminating against a section of the Kenyan population and does not align to the principle of inclusion.</p> <p>Increased registration costs have a high potential of leading to increased lack of access to registration which is a fundamental right for all Kenyans.</p>



## 2. The Registration of Persons (Amendment) Rules 2024

Regulation	Provision	Issue/Concern	Proposal/Recommendation	Justification for Proposal
Rule 2	<p>3(1). The identity card issued under section 9 of the Act shall consist of <b>an electronic card</b> set out in the first schedule to these rules;</p> <p>3(2). The electronic card issued under this Regulation <b>may also be presented in a digital or virtual form.</b></p>	<p>The proposed amendment seeks to introduce a substantive change through regulations.</p> <p>The proposed amendment under Rule 3(1) is inconsistent with the <i>Registration of Persons Act</i> Section 3 and 9 (1) and violates the hierarchy of laws.</p> <p>The proposed amendment is inconsistent with the Regulatory Impact Statement.</p> <p>The introduction of both physical and digital forms of the identity card offers flexibility but may lead to inconsistencies if not well integrated.</p> <p>Additionally, there are concerns about ensuring that all individuals, particularly in rural areas, have access to the necessary technology for virtual cards.</p> <p>The proposed amendment is not clear on whether the electronic card will be issued</p>	<p>a) Such a substantive change ought to be introduced through the full legislative process by amending the Registrations of Persons Act.</p> <p>b) Rectify this inconsistency by making amendments to the conflicting substantive law provisions.</p> <p>c) Amend the Regulatory Impact Statement to remove the assertion that proposed amendments are not inconsistent with existing laws.</p> <p>d) Ensure that the electronic identity card system is robust and integrated with the physical card system to avoid discrepancy.</p> <p>e) Invest in infrastructure to ensure equitable access to digital card technologies, especially in underserved areas.</p>	<p>Section 3 and 9 (1)—read together with the First Schedule—still defines an "identity card" in its traditional form, without reference to an electronic card.</p> <p>This presents an obvious discrepancy where the proposed amendment carries a definition of an "identity card" which is contrary to the existing and current definition of an "identity card" under Section 9 of the Registration of Persons Act. The proposed amendment creates a legal inconsistency because two legal documents will define the same term in conflicting ways.</p> <p>The effect of the proposed amendment seeks to vitiate the existing second generation physical identity cards, which represents a <b>substantial change</b> to the very core of what constitutes an ID in Kenya and alters the foundational legal status of current identity cards under Kenyan law.</p> <p>This discrepancy further constitutes a conflict of laws where the proposed amendment is contrary to an existing</p>

		<p>both in physical and digital form.</p> <p>It is not clear on circumstances that might inform the presentation of the electronic card in digital or virtual form.</p> <p>Concerns on use of full digital or virtual card especially due to the digital gap and the smartphone use gap in Kenya.</p> <p>The deletion of regulation 3 in whole presents a legal quagmire on what will be required of persons holding the current physical IDs. Would said persons be required to register anew?</p>	<p>f) Develop (a minimum of a 5 year) migration roadmap to the electronic system for all Kenyans.</p>	<p>statutory provision. This also contravenes the hierarchy of laws. An amendment to a subsidiary law must align with existing substantive laws otherwise, it leads to legal uncertainty and invalidation of the amendment if not rectified.</p> <p>In the Regulatory Impact Statement, there is an assertion that the proposed amendments are not inconsistent with any existing laws.</p> <p>This clearly impugns the veracity of the Regulatory Impact Statement as there is a demonstrated inconsistency with Section 3 &amp; 9 (1) of the Registration of Persons Act.</p> <p>Issuance of electronic card is a welcome move but without clear articulation that the e-card will be complimentary to the physical card presents an ambiguity and has a high potential of delineating marginalized and low-income level person's in Kenya.</p> <p>The ministry needs to also consider the digital and smartphone use gap in the country hence the emphasis of integrating the electronic card to the physical identity card system.</p> <p>Limiting the IDs to only electronic form</p>
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Rule 3	<p>5(1). Where a person attends before a registration officer for the purpose of registering himself or herself under subsection (1) or subsection (2) of section 6 of the Act, that person shall permit the registration officer to record— (a) facial, thumb and fingerprint biometric data in a</p>	<p><b>Lack of data minimization:</b></p> <p>Collection of multiple types of biometric data raises concerns about data privacy and security.</p> <p>Additionally, there could be issues related to the accuracy and integrity of biometric data.</p> <p>There is also the issue of potential disparities in access to biometric recording devices.</p>	<p>a) Comply with the Data Protection Act, 2019 and Implement stringent data protection measures for handling biometric data, including encryption and secure storage.</p> <p>b) Provide comprehensive training for registration officers to ensure accurate data collection.</p>	<p>Ensuring strong data protection and training helps to safeguard personal information and maintain the integrity of the registration process.</p> <p>Addressing access issues ensures that the biometric system is fair and inclusive, preventing any group from being disadvantaged.</p> <p>Addressing the collection, use, storage management of the collected data will ensure protection of the collected</p>

	<p>prescribed electronic/digital device; (b) thumb and fingerprint impressions in the form in the third schedule of these rules.</p> <p>(2). The registration officer shall thereupon fill in and sign a physical or digitally generated certificate and shall issue the certificate to that person.’</p>	<p>Lack of existing policies on legal mandates on collection of biometric data. Lack of legal and technical policies on use, management, storage and security of biometric data.</p> <p>Lack of existing biometric register/ repository that can be used for verification purposes.</p>	<ul style="list-style-type: none"> <li>c) Consider alternative methods or support for individuals who may face challenges with biometric data collection.</li> <li>d) Develop the relevant technical and legal policies to address use, management and storage of biometric data.</li> <li>e) Develop technical policies to address the technical system requirements for equipment that will be used in collection of the biometric data ensuring it addresses issues of false positive and false negative.</li> <li>f) Establish a biometric data register/ repository.</li> </ul>	<p>biometric data and aligns with the principle of data privacy of purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality (security), and accountability.</p> <p>Collection of biometric should not be collected just for the sake of being seen as a tick-box exercise. This data should be able to be used to verify persons and reduce chances of identity theft and limit chances of false negatives and positives.</p> <p>(See: <a href="#">World Bank Practitioner’s Guide on Biometric data   Identification for Development</a> for more information on biometric data).</p> <p>Therefore, there is a need for the ministry in collaboration with the ministry of ICT to establish a biometrics data register or repository that will support verification.</p> <p>(See: <a href="#">Regional Report Biometrics and Digital Identity in Africa</a> for more information and guidance).</p>
Rule 4	7. The principal registrar shall adopt <b>UPI number</b> generated under the Births and Deaths Registration Act, Cap.149	Allowing the use of either the UPIN or new index numbers could lead to confusion and inconsistencies in personal identification records.	Standardize the use of either the UPIN or a new system across all identity cards to ensure consistency.  If transitioning to a new numbering	Consistency in identification numbers simplifies the management of personal records and reduces potential errors. A unified system ensures clarity and coherence in the national database,

	of the Laws of Kenya as identity number or may allot such index letters and serial numbers to be inserted in the identity cards as he/she may deem fit.	This dual system might create difficulties in maintaining a unified and coherent identification database.	system, provide clear guidelines and transition plans to avoid confusion and errors.	which is crucial for effective public services and governance.
Rule 5	8(2) The registration officer shall thereupon fill and sign a physically <b>or digitally generated certificate</b> in the form in the fourth schedule and shall issue the certificate to the registered person.	Similar to other provisions, using both physical and digital certificates could create inconsistencies.  Besides, there may be concerns about the security and authenticity of digital certificates.	<p>a) Ensure that the digital certificate system is secure, with strong authentication measures.</p> <p>b) Standardize the format and issuance process of certificates to align with the identity card system and minimize discrepancies.</p>	<p>A secure and standardized digital certificate system enhances the reliability and integrity of the registration process, ensuring that all certificates are accurate and uniformly issued.</p> <p>This promotes trust and efficiency in the identification system.</p> <p>(See: <a href="#">World Bank Practitioner's Guide on Digital certificates and PKI   Identification for Development</a> for more information).</p>
<b>Schedule</b>				
First Schedule	<ul style="list-style-type: none"> <li>First schedule is inconsistent with the First schedule of the Registrations of Persons Act.</li> <li>Has a microchip.</li> <li>Has the UPI No.</li> </ul>	<ul style="list-style-type: none"> <li>The First schedule of the Registrations of Persons Act maintains the second generation non-electronic ID.</li> <li>The use of a microchip and UPIN raises concerns about data security and privacy. It</li> </ul>	<p>a) Rectify the discrepancy and conflict with existing substantive legislation presented by this amendment.</p> <p>b) Develop clear guidelines on how data will be protected and managed.</p>	<p>This offends the hierarchy of laws. An amendment to a subsidiary law must align with existing substantive laws otherwise, it leads to legal uncertainty and invalidation of the amendment if not rectified.</p> <p>Protecting data stored on the microchip and UPIN is crucial for maintaining privacy and preventing misuse.</p>

	<p>(Maisha Number) given at birth</p> <ul style="list-style-type: none"> <li>Has expiry data on the proposed electronic card.</li> </ul>	<p>also doesn't give opportunity for use of technology neutral solutions.</p> <ul style="list-style-type: none"> <li>Introduction of expiry date on the card has a high potential of leading to disenfranchisement of Kenyans. Registration of persons is a fundamental right and should not be limited or seem to be limited by any law, principle or by design.</li> <li>Lack of existing policies and technical requirements to guide renewal process, interoperability especially on the need to change providers and manufacturing challenges that might be caused due to challenges caused by delays due to the global chip production/market.</li> </ul>	<ul style="list-style-type: none"> <li>c) Implement robust data protection measures for the microchip and UPIN data, including encryption and secure access controls.</li> <li>d) Ensure transparency about data usage and storage practices.</li> <li>e) Remove the expiry date on the card.</li> <li>f) Consider the use of non-chip cards.</li> <li>g) Develop technical requirements and standards to inform technical specifications of the e-cards.</li> </ul>	<p>(See: Working Paper on <a href="#">Security and Privacy Impacts of a Unique Personal Identifier</a> for additional guidance).</p> <p>Transparency and robust security measures build public trust and ensure the integrity of the identification system.</p> <p>These recommendations will ensure that the concerns raised are effectively addressed and align with the global best practice.</p> <p>(See: <a href="#">AU Interoperability Framework For Digital ID</a> for more information on continental standards).</p>
Second Schedule	<ul style="list-style-type: none"> <li>Adds a requirement for the</li> </ul>	Adding new biometric requirements could complicate the registration process and	<ul style="list-style-type: none"> <li>a) Streamline the registration process by evaluating the necessity of additional</li> </ul>	Simplifying the registration process and ensuring secure handling of biometric data reduces administrative burdens and

	<p>parent's/guardian's left-hand thumbprint in cases where applicable. biometric)</p> <ul style="list-style-type: none"> <li>• Adds a requirement for these officers to include their "ID/No." when certifying the application.</li> </ul>	<p>raise concerns about the handling and security of additional data. (Failing to adhere to the principle of data minimization)</p>	<p>biometric data.</p> <p>b) Ensure that all biometric data collected is handled securely, and provide clear instructions to both parents/guardians and officers.</p>	<p>potential privacy issues, while maintaining the integrity of the system.</p>
Third Schedule	<p>The Third Schedule in the Registration of Persons Rules is used to:</p> <ul style="list-style-type: none"> <li>• Collect biometric data, specifically fingerprint impressions.</li> <li>• Document personal information like names, address, and date of birth.</li> <li>• Record legal details, including the identity card number and signatures.</li> <li>• Ensure accuracy</li> </ul>	<p>The new schedule has a slight formatting inconsistency or error with the fingerprint labeling, such as a repetition of "ROLLED IMPRESSIONS—RIGHT HAND" and some missing labels for specific fingers.</p> <p>The form doesn't include a section for confirming collected and expected facial recognition data mentioned in amendment point 2 meant to replace regulation no. 5.</p>	<p>a) Correct formatting errors and ensure consistency in biometric data collection procedures.</p> <p>b) Regularly review and update schedules to reflect best practices and maintain accuracy.</p> <p>c) Include a section of the proposed facial biometric data to be collected as part of the registration data</p>	<p>Accurate and well-formatted data collection is essential for reliable identification records.</p>

	<p>and accountability in the identity registration process.</p> <ul style="list-style-type: none"> <li>● Handle special cases, like missing or deformed fingers.</li> </ul>			
Fifth Schedule	The new proposed Fifth Schedule adds a specific field for "Ref. ID No." and "Misc. R. No."	Introducing new fields without clear explanation may create confusion or unnecessary complexity in the registration process.	<ul style="list-style-type: none"> <li>a) Clearly define the purpose of the new fields and ensure that their inclusion adds value to the registration process.</li> <li>b) Provide guidance on their use to avoid confusion.</li> </ul>	Clearly defined and purposeful fields improve efficiency and clarity on the registration process, reducing administrative confusion and enhancing the system's functional
Sixth Schedule	Prescribed Identity Card Fees	Introduction of processing fees may pose a barrier to accessing identity registration services, especially for low-income individuals.	<ul style="list-style-type: none"> <li>a) Consider implementing a tiered fee structure or subsidies for those in financial need.</li> <li>b) Ensure that the fees are reasonable and do not impede access to essential services.</li> </ul>	<p>A fair and accessible fee structure ensures that all individuals can obtain identity cards without financial hardship, promoting equity and inclusivity in the registration process.</p> <p>(See: <a href="#">Digital ID systems in Africa: Challenges, risks and opportunities</a> for more information and guidance on creating an inclusive, accessible and affordable digital ID system).</p>