

A National Unified Registry For Lebanon. *A Tool Of State Building?*

Policy Brief

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Abbreviations

CeSSRA	The Center for Social Sciences Research & Action
ESSNP	Emergency Social Safety Net Program
ILO	International Labour Organization
MoF	Ministry of Finance
MoPH	Ministry of Public Health
MoSA	Ministry of Social Affairs
NPTP	National Poverty Targeting Program
NSPS	National Social Protection Strategy
NSSF	National Social Security Fund
NUR	National Unified Registry
PCM	Presidency of the Council of Ministers
SP	Social Protection
UNICEF	United Nations International Children's Emergency Fund

Contents

Abbreviations	2
Contents	3
1 . Social Policy in Times of Structural and Cyclical Crises	4
2 . Seizing Momentum	6
3 . Overcoming the Clash of Paradigms	7
4 . Re-thinking the Governance Model	8
5 . Exploring the Reform Options	11
6 . Committing to a Sound Reform Path	14
7 . Key Recommendations	15
List of References	16

1 Social Policy in Times of Structural and Cyclical Crises¹

Lebanon's social protection system has long been inadequate and ineffective, failing to provide minimum safeguards for its population (CAS & ILO, 2019) and or to prevent the dramatic spillover of economic and social turmoil. It has been described as essentially fragmented, exclusionary, and discriminatory (Scala, 2022), thus undermining the state's already limited capacity to respond to crises, whether natural or man-made.

Lebanon has been witnessing recurrent crises of unprecedented magnitude, scale, and spread.

The collapse of the economy in 2020 was caused by a multifaceted crisis mainly marked by:



A public debt failure

after sustaining one of the highest debt levels for decades, reaching 150-180% of GDP, according to the World Bank Group (Spring 2021). This had significant implications: On the one hand, it weakened the state's capacity to externally finance social interventions among other critical needs; on the other hand, it depleted the assets of commercial banks (equally liable for the crisis). These losses were systematically transferred to all depositors equally, regardless of wealth, age, or any determinant factor of life risks.



A potent depreciation-inflation dynamic

described by international institutions as a "deliberate" fall (World Bank Group, Fall 2020), eroding more than 90% of people's purchasing power. This has inflicted highly regressive and disproportionate losses affecting the shrinking "missing middle" which does not have access to any type of social protection (Institut des Finances Basil Fuleihan, 2021), as well as the elderly, left with little to no social protection, and a rising number of unemployed, uncovered, and unprotected.



A massive shrinking of the economy

by -25% compared to pre-crisis levels. This has had major implications on unemployment, with rates estimated between 28% (pre-COVID) and 40% (at the peak of the crisis). Poverty levels have also surged, with 50% of the population reportedly living below the national poverty line (World Bank Group, Spring 2021).

1. This brief is based on a more extensive study that will be published separately.

The Beirut Port explosion was described as a “blast in the midst of crises” (International Labour Organization, 2021). It showcased, once again, the state’s limited capacity to respond to disproportionately large-scale shocks, the latter becoming the norm. The explosion left the city with devastating repercussions:

7,000
wounded

1,000
injured children

150
disabled

77,000
damaged apartments

300,000
displaced

\$ 500M
worth of
infrastructural
damage
(HRW, 2021)

35%
of enterprises within a
5 km radius severely or
completely damaged
(ILO, 2021)

The proactive response of CSOs was praised by many, but it fell short of what a centralised, coordinated, and targeted state response could have achieved. Coordination with state parties (mainly the Lebanese Army and municipalities) was established to identify needs and to access affected areas, yet it remained tactical rather than strategic (Bou Zeid & Abouchedid, 2021). As such, a comprehensive coordinated response was not possible, as state institutions were unable to organise a relevant, targeted, prioritised, and comprehensive response action without updated registries and functional information management systems.

Four years into the crisis, with donor fatigue setting in and international assistance priorities shifting towards the war in Ukraine, the country experienced a gradual yet systemic disengagement of taxpayers. This was fuelled by the devaluation of social contributions and the takeover of social assistance programmes by donor organisations. The country also witnessed the recrudescence of clientelist networks amidst a social protection context riddled with charity-driven and pro-poor approaches. More recently, following the war and genocide in Gaza that began on October 7, 2023, and

the subsequent outbreak of conflict along Lebanon’s southern border as of October 8, 2023, the dramatic escalation between September and November 2024 had extremely high social costs on Lebanon. An estimated 1.5 million people were internally displaced (United Nations, 2024), with over 13,000 injured and 3,500 killed. Once again, the country suffered from the lack of an effective, centralised, and state-led policy response, with limited data available on the full extent and impact of the catastrophe. Regardless of differing narratives, financing, needs, roles, and responsibilities, one fact remains undeniable, which is the country’s dire need for effective crisis and emergency response.

In times of peace (albeit a negative peace), the lack of centralised data, which constitutes the backbone of sound and proactive policymaking, was a critical shortcoming. In times of acute crises, this becomes an even more pressing need to ensure an accurate and inclusive response, facilitate adaptation and post-war recovery, and develop long-term, rights-based social policies. This would require a solid, integrated, and unified database of citizens and their needs, including a protected infrastructure of data systems, appropriate database management, interoperability frameworks, secure networking, functioning software, clear institutional arrangements, and reformed legal frameworks.

This policy brief advocates for the creation of a National Unified Registry (NUR) for Lebanon that supports outreach, intake, and registration of beneficiaries and validates their eligibility for welfare programmes, as well as for emergency programmes. Comprehensive knowledge and data on the Lebanese population is particularly vital in times of crisis, where needs are greater, resources are scarcer, and the number of social protection service providers increases, often in a chaotic and uncoordinated manner. This brief investigates the challenges hindering the creation of such a unified registry and explores different reform options. It also clarifies various social protection paradigms that could impact the design and the establishment of this database.

2 Seizing Momentum

Lebanon's successive crises appear to have brought about a set of technical and political factors that might be conducive to the establishment of a long-overdue unified delivery mechanism for social protection systems. This mechanism is often referred to as a national unified registry (NUR) in much of the abundant literature on the topic.

Between 2021 and 2023, the government secured the financial and technical support of the World Bank (WB) to scale up social assistance coverage through the Emergency Social Safety Net (ESSN). Part of the loan was dedicated to strengthening the social safety net delivery system by integrating and expanding the scope and functions of the existing rudimentary social registry². In December 2023, the government enacted a new law to establish a comprehensive pension system for private-sector workers. This legislation, coupled with the newly adopted National Social Protection Strategy (NSPS), implies at least a political acknowledgement of the need for a more inclusive and comprehensive social protection system. This is especially true since the NSPS highlighted the importance of unifying information and data systems as a strategic priority. In 2024, the European Union (EU) contracted international development company DAI to support the Lebanese government in the establishment of a unified registry for social protection with the ultimate purpose of ensuring comprehensive data management and connecting beneficiaries across various social protection services in Lebanon.

Unfortunately, this momentum does not guarantee the establishment of a unified registry. Decision makers should clearly understand that selecting and establishing an adequate delivery mechanism for social protection requires an exceptional ability to strike a delicate balance between different yet complementary reform tracks and to embrace different progress speeds and sequencing.

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2. Already established as part of the NPTP.

3 Overcoming the Clash of Paradigms

There is consensus among various stakeholders³ on the need for an efficient delivery system that supports outreach, intake, and registration of beneficiaries and validates their eligibility for welfare programmes. However, it is clear that approaches on how the design of a NUR should be conceived and phased diverge significantly. Before delving into the methods of “how” to achieve integration and interoperability across registries, it is imperative to address the fundamental question of “what” exactly is being integrated, interoperated, or unified. This means understanding the various political and technical factors/agendas underlying the social protection paradigm guiding the integration or the unification process. Decision makers have to choose between two opposite paradigms: rather than conceiving the unified registry as a mere screening tool for targeted social assistance policies, a stand-alone initiative, or even a cog in the machinery of conditional social assistance programmes – as is currently the case – the unified registry could rather be designed and implemented as a monitoring tool and a significant milestone in the pursuit of an inclusive and universal social protection system.

The conception of the NUR varies drastically from one actor to another. While, in practice, the WB promotes social registries alongside social assistance programmes, some studies argue that social registries “derive from a neoliberal vision of social security, which advocates for a small state, low taxes, and low-cost programmes for the poor,” claiming that, by design, social registries are doomed to fail. Kidd et al. re-iterate that no social registry has even succeeded to achieve its core purpose of identifying and targeting relevant beneficiaries of associated social programmes and, consequently, such a registry cannot evolve to become an inclusive NUR.

Box 1. The Clash of Paradigm - Actors and Agendas Shaping the Establishment of a National Registry for Social Protection

3. State institutions, the donor community, and development agents.

4 Re-thinking the Governance Model

Consolidations and unifications of public data, as well as mainstreaming unified registries in public management, are ambitious tasks that are deemed to “revolutionise” (Tomlinson, 2019) administrative practices and standards. Governments, state-centric institutions, and local authorities of diverse scales are increasingly integrating digital solutions, information and communication technologies (ICTs), and data-driven approaches in their operations and services. However, the rise of a governance framework for the digital state, especially in a fragmented context such as Lebanon’s social protection landscape⁴, raises multiple concerns. These include legal, technical, institutional, and policy issues (Figure 1) that need to be addressed before the official implementation of such a governance system. Most importantly, this governance model must resolve the potential tension between different sets of values and obligations, such as data privacy and confidentiality versus the necessity to disclose some personal details or the risk of data leaks due to potential loopholes.

A Holistic Approach to the Management of Information Systems

 Institutional and Legal Setting	 Data Governance and Infrastructure	 Political Will and Readiness	 Human Capacity	 Cultural and Ethical Considerations
 Inter-agency coordination  Clarity of R&R  Legal framework for overall system lead and administration	 Management protocol  Protection and privacy  Interoperability framework  Unique ID and other	 Leadership & Ownership  Commitment  Sustainability  Endorsements	 Data management units  Competency framework and Job descriptions  Continuous Training	 Transparency  Culture of sharing  Privacy

Figure 1. Key Requirements for Integrating Social Protection Information Systems

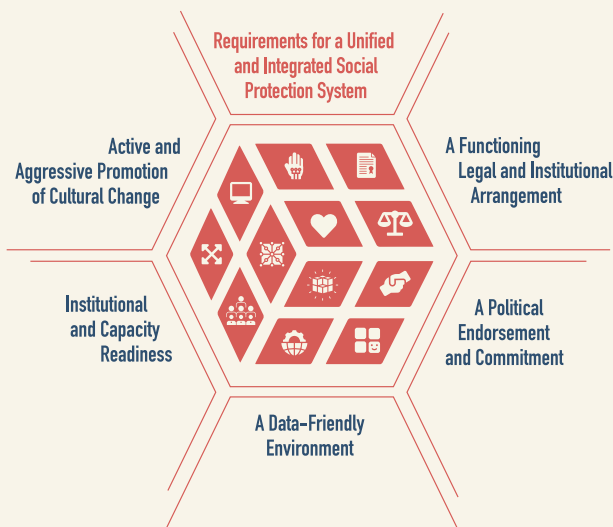
Reference: (George & Leite, *Integrated Social Information Systems and Social Registries*, 2019), adapted

4. There are more than 145 social protection programmes/services identifiable through the budget and official documentation. Should an official and extensive SP service mapping be conducted, the number tag is likely to increase significantly.

The landscape of security and surveillance in Lebanon is characterised by the multiplicity of actors with overlapping competencies. Unfortunately, the country has witnessed systematic violations and significant threats of heightened breaches and cyber-attacks compromising citizens’ “personal data and privacy.” State policies, notably those related to digital technologies, must guarantee the security, confidentiality, and privacy of personal data.

Additionally, the political leadership should be able to address a set of issues that impact the information system management pillars showcased in Figure 1.

The following arrangements are necessary to create a conducive environment for comprehensive data management:



(i) A Functioning Legal and Institutional Arrangement

This would establish the guiding principles for management, define roles and responsibilities, outline security and protection ethics, and clarify the brainware arrangements across the public sector. It would also address potential overlapping provisions in other laws and ensure coordination among various state bodies and entities and other parties. The provision of SP services is a cross-cutting function across multiple public sector actors (MoSA, NSSF, PCM, mutual funds, MoPH, etc.). The NSPS has indeed acknowledged that “one of the core requirements for realising the objectives of the Social Protection Strategy is the governance and institutional framework for its implementation” (Government of Lebanon, 2023). The Strategy proposes multiple policy options to revamp the institutional arrangements based on the pre-defined SP pillars. Yet, beyond the issue of service provision, the usage and management of data directly or indirectly related to SP services require the involvement of other state entities that are not providers of social services, such as the MoF, the Internal Security Forces (ISF), or others. An additional layer of institutional governance overhaul is required to establish a solid foundation for data management and integration. Consequently, decision-makers should be extremely vigilant given the complex interconnections between fiscal frameworks, the personal status law, labour policies, and social protection reforms, as well as the magnitude of the effort required to manage parallel reform tracks simultaneously. Decision makers face the challenging task of presenting a legal and institutional arrangement that is conducive to the initiation of a NUR in Lebanon, while ensuring it does not compromise or obstruct the establishment of such a registry by overburdening the already limited capacity of the public sector. .



(ii) A Political Endorsement and Commitment

Political will and orientation are important starting points and might impact the underlying paradigm guiding the overall reform. Political authorities will have to answer a set of questions that are key to defining and shaping any integration strategy and action plan. Among these questions are the following: What are the primary databases to be selected for the first layer of integration? What is the ultimate purpose of this integration – creating an integrated social registry or establishing a comprehensive social assistance or social protection programme? Which state entity will be managing the data – an existing body such as MoSA, the inter-ministerial committee, or the Central Administration of Statistics, or a new entity to be established?



(iii) A Data-Friendly Environment

Transitioning to a NUR also necessitates significant infrastructural and technological capabilities, along with substantial public investments. However, these efforts may be compromised and delayed by tight financial constraints and significant efficiency gaps. There is also a need to enhance the digital infrastructure and skills of both recipients and providers of social protection services. This is essential to meet the requirements of specific functions such as reporting, data collection, preservation, and sharing, data security, protection, and access protocols, the interoperability framework, infrastructure requirements, and management practices, all while ensuring data privacy and confidentiality.



(iv) Institutional and Capacity Readiness

A dedicated, skilled, and technical workforce is essential for the new data management functions. This requires building solid institutional capacity to manage and handle the larger scale of data generation and capture. For instance, data management units should be established across ministries, data management positions in the public sector should be professionalised, and a clear competency framework should be set. This would allow the state to monitor new trends and remain adaptable to continuous changes in the fast-paced sector of digital technologies.



(v) Active and Aggressive Promotion of Cultural Change

A solid strategy is equally needed to promote cultural and behavioural change, as well as awareness among public sector employees to abandon the legacy of entrenched paper-based practices and adopt a digital, data-centric culture in every aspect of day-to-day management.

Acknowledging the need for governance revamp is key, yet an equally critical question is still to be addressed: How does the state ensure a conducive environment for data management? Should it be based on gradual, bilateral syncing between institutions? Or should it be the result of a top-down approach establishing a data management framework applicable to all? If opting for the second approach, what is the most optimal and practical method for data collection and identification?

5 Exploring the Reform Options

A holistic approach to the NUR involves implementing the entire system at once, providing a comprehensive solution but potentially posing higher risks and challenges. This would require simultaneous reform measures across the public sector. On the other hand, an incremental approach entails phased implementation, allowing for gradual adjustments and adaptations over time. An incremental approach might be more suitable for the Lebanese context where concerns about potential disruptions and limited resources are acute. Such an approach would allow sequential stages for reforming, testing, and refining the various processes of unification, classification, and protection of data. However, this may prolong the overall implementation timeline and increase the likelihood of jeopardising the whole process.

Unlike incremental implementation, gradual integration might be the simplest way to move forward. While it would still involve a step-by-step process, gradual integration could still target the establishment of a unified registry without the ambition of breaking down an entire reform project (as a whole) into smaller tasks.

Indeed, empirical evidence from past reforms in Lebanon indicates that political interference in one domain usually manifests as a blockade in another or even as a generalised stalemate, thereby halting or endangering the entire modernisation process.

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Designing a proper framework and plan would require considering multiple aspects:

(i) Building on What Exists Without Compromising the Solution's Effectiveness



The Unified Identification Number Law

No. 241 dated 22 October 2012 and its corresponding Decree No. 168 dated 17 February 2017, assigned the sole responsibility for issuing and managing the Unified Identification Number to the Directorate-General of Civil Status at the Ministry of Interior and Municipalities. This law cannot be overlooked while conceiving a national unified registry for Lebanon.

Other existing laws that might affect the design of a NUR, and should therefore be taken into consideration, include:



The E-Transactions and Personal Data Law

No. 81, dated 10 October 2018



The Consumer Protection Law

No. 659/2005, dated 4 February 2005



The Lebanese Government Interoperability Framework (LGIF)



The Lebanese Government Interoperability Reference Architecture (LGIRA)



The unique ID Decree

No. 168 issued on the 17th of February 2017 which sets the rules and modalities for the adoption of the Unique ID Number in the Public Sector.

(ii) Safeguarding the Vision Articulated in the NSPS

“Establish mechanisms and platforms for data sharing and its related validated institutional architecture.”

This requires, as per the NSPS, to initiate two reform trajectories: 1) ensure integration between various existing registries or databases across different social protection pillars; and 2) enable interoperability with other public institutions (such as the civil registries, fiscal registry, commerce registries, and others).

(iii) Avoiding the Trap of Social Registries

International experiences show that data collected through proxy-means testing are “undertaken at a particular point in time” and not updated until the next data collection process.

As a result, targeted registries are designed with the underlying assumption that “we live in a static world,” while the household structure and conditions could change rapidly, as poverty is not a static condition. Social registries, also known as targeted databases, cannot evolve to become a NUR.

Given the complexity of the Lebanese governance and political environment, a gradual approach to putting in place a NUR seems to be the most suitable. While a data integration framework might seem like a technical matter, it is mostly a policy and political issue. It will have to address a set of complex issues such as securing political consensus on the ultimate purpose of the integration and determining the range and scale of data that will be integrated and rendered accessible to programme administrators.

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6 Committing to a Sound Reform Path

Any integration plan should be thought of in light of government priorities, as well as human and financial capacities. These considerations are decisive in defining the integration sequencing of programmes and the interoperability implementation scale that might be extended across all external registries or limited to key registries such as civil registries and fiscal databases. It will also have to synchronise digitisation efforts in select line ministries with the potential requirements of the national integration framework. Finally, and above all, the integration priorities should be aligned with the NSPS and its corresponding action plan.

Ultimately, the integration plan should be the result of the following phases:

(i) **Championing the Reform**

A designated entity should oversee the design and implementation of the integration plan while ensuring all stakeholders are on board and bottlenecks are properly managed. This entity shall not be under the direct control of one ministry but rather emanate from an inter-ministerial committee.

(ii) **Ground Assessment**

Conducting an institutional mapping and methodical assessment of existing systems and available datasets is essential. SP providers subject to the assessment could be prioritised based on the scale of their coverage and the depth of their data. A realistic approach, for instance, would be to cover, as a first step, key entities and programmes such as the NSSF, NPTP, ESSN, fiscal and commercial registries, and ISF registries to determine the technical requirements that will form the basis for the common, unified system. Other mutual funds, SP providers, or state entities will have to adapt to accommodate the new system requirements.

(iii) **Designing the Intervention**

Based on a participatory approach, the lead entity will have to develop an action plan that sets the steps, priorities, and timeline for the integration processes.

(iv) **Implementing the Intervention**

The implementation process would include drafting appropriate laws and secondary legislation, developing guidelines and manuals, setting the infrastructure and technical requirements, ensuring compliance therewith, and developing security, protection, and access protocols, among others.

7 Key Recommendations

Finally, some major recommendations could help shape the future of social policies in Lebanon:

Conducting further research on the political role and instrumentalisation of data

Further research is necessary to understand how data is politically constructed in Lebanon and its role in sustaining existing power structures. This research should explore the mechanisms through which data shapes political decisions and governance, highlighting its role in reinforcing or challenging dominant narratives.

Addressing legal, ethical, and practical challenges specific to Lebanon

This includes developing legal frameworks that build public trust and ensure ethical data practices. Public resistance must be addressed through transparency, informed consent, and participatory processes.

Conducting simultaneous reforms across the public sector

This includes establishing a labour market information system, reforming tax administration, and implementing universal social policies. Reforms should also address data security and protection, scrutinising the fundamental operations of the judiciary and military/security apparatus.

Establishing a solid foundation for data management and integration requires an overhaul of institutional governance

The digital strategy developed by the Office of the Minister of State for Administrative Reform (OMSAR) can serve as a starting point for a national discussion on digital governance.

Extending governance beyond the public sector

This includes Non-Governmental Organisations (NGOs), which play a significant role in providing social protection services.

Building trust between institutions

It is essential for a revamped data management model. This involves creating a clear framework for data sharing and access, with well-defined roles and responsibilities.

Establishing and enforcing a framework for data governance

This critical framework should include guidelines for data structure, accessibility, transparency, security, and privacy.

Hosting all social data within the country

It is a prerequisite for ensuring data security. Several ministries currently store their data on external clouds, which poses security risks. Utilising local data centres, such as Ogero, can enhance data security by ensuring that state-owned and state-managed databases are housed within a secure national infrastructure.

Professionalising data management in the public sector

This would require the development of clear job descriptions and, more importantly, the establishment of a detailed competency framework that responds to new technology trends and adapts to continuous changes.

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