#### DOCUMENT OF THE INTER-AMERICAN DEVELOPMENT BANK

### **JAMAICA**

# IMPLEMENTATION OF THE NATIONAL IDENTIFICATION SYSTEM (NIDS) FOR ECONOMIC GROWTH

(JA-L1072)

**PROJECT PROFILE** 

This document was prepared by the project team consisting of: Camila Mejia (IFD/ICS), Team Leader; Javier Leon (IFD/ICS), Alternate Team Leader; Alejandro Pareja (IFD/ICS); Arturo Muente (IFD/ICS); Roberto De Michele (IFD/ICS); Estefania Calderon (IFD/ICS); Brodrick Watson (CCB/CJA); Nathalie Hoffman (IFD/ICS); Francesco De Simone (IFD/ICS); Rene Herrera (VPC/FMP); Naveen Jainauth-Umrao (VPC/FMP) and Margie-Lys Jaime Ramirez (LEG/SGO).

Under the Access to Information Policy, this document is subject to Public Disclosure.

### PROJECT PROFILE

### **JAMAICA**

#### I. BASIC DATA

Project Name: Implementation of the National Identification System (NIDS) for

**Economic Growth** 

Project Number: JA-L1072

Project Team: Camila Mejia (IFD/ICS), Team Leader; Javier Leon (IFD/ICS),

Alternate Team Leader; Alejandro Pareja (IFD/ICS); Arturo Muente (IFD/ICS); Roberto De Michele (IFD/ICS); Estefania Calderon (IFD/ICS); Brodrick Watson (CCB/CJA); Nathalie Hoffman (IFD/ICS); Francesco De Simone (IFD/ICS); Rene Herrera (VPC/FMP); Naveen Jainauth-Umrao (VPC/FMP) and

Margie-Lys Jaime Ramirez (LEG/SGO)

Borrower: Government of Jamaica (GOJ)

Executing Agency: Office of the Prime Minister (OPM)

Financial Plan: IDB (Ordinary Capital): US\$ 68,000,000

Total: US\$ 68,000,000

Safeguards: Policies triggered: OP-102; OP-703; B.2; B.3; B.7

Classification: C

#### II. GENERAL JUSTIFICATION AND OBJECTIVES

2.1 Verifying a person's identity is a challenging and costly task for public and private entities in Jamaica. To access public and private services citizens are commonly required to present multiple documents to prove their identity. Ministries, Departments and Agencies (MDAs), as well as private sector entities have to undergo costly identity verification processes. For instance, to access social programmes under the Ministry of Labor and Social Security (MLSS), citizens are required to present two (2) different documents, plus their birth certificate. It is not uncommon for citizens to entirely lack identity support documentation, which means they have to undergo the process of obtaining at least two (2) such documents before being registered in a programme. Women and the population with disabilities, who benefit in a higher proportion from social programmes, are more affected by these challenges. In the private sector, banks require customers to present at least three (3) different proofs of identity plus two (2) references, certified by a Justice of the Peace (JP).2 The multiplicity of documents required force citizens have to make multiple trips to public and private

<sup>54%</sup> of the persons under the National Insurance Scheme are women and social safety net programmes include benefits for pregnant and lactating women and the disabled population.

<sup>&</sup>lt;sup>2</sup> Bank of Jamaica, "Guidance Notes on the Detection and Prevention of Money Laundering and Terrorist Financing Activities", 2016.

sector institutions in order to compile these documents and to access the service. This results in the loss of productive hours by citizens, longer processing times, more Greenhouse Gas (GHG) emissions and higher operational costs due to the need for more personnel only to perform identity verification tasks and more storage/archive space to adequately store all documents presented. The impact of these controls, requirements and transactions involve high costs that are borne by both service providers and citizens. Therefore, one of the main problems identified in this operation is the high transactional costs associated with identity verification for citizens to access and for providers to deliver services both in the private and public sectors in Jamaica.<sup>3</sup>

- 2.2 The main cause of this problem is the fact that Jamaica does not have a unique, reliable and universal identification system. With a population of 2.7 million,<sup>4</sup> the country does not have a foundational identification system<sup>5</sup> that can reliably allow the verification of identity for its citizens. An optimal identification system must be: unique, reliable and universal. Unique means that every individual is assigned a single identification number that facilitates the integration of individual records across a wide range of data registers. Reliable to the system having enough attributes to allow the credible verification of an individual's identity. Universal, indicates the extent of coverage of the identification of the entire population.<sup>6</sup>
- 2.3 Creating a unique, reliable and universal identification system in Jamaica will be a critical enabler for achieving some key results. Firstly, it could improve financial inclusion and mitigate the incidence of de-risking, by making it easier for banks to successfully identify their customers. The lack of a unique, secure, reliable and universal national identification document in Jamaica makes it more difficult for financial institutions to identify their customers and comply with Know Your Customer (KYC) standards and regulations and is likely one of the drivers of de-risking. According to data provided by the Bank of Jamaica (BOJ), in 2015 alone, Jamaican Banks lost eighteen (18) correspondent banking relations, a clear indicator that de-risking is a significant problem in the country. In turn, de-risking can result in financial exclusion, as local banks can decide to cut off "riskier" clients, often those at the bottom of the income pyramid who do not have access to different forms of identification, to reduce their own risk exposure. Secondly, identification systems can provide accurate information of vulnerable populations, increasing the efficiency and coordination of social protection programmes. Such programmes can be more effective with precise targeting and robust authentication of the intended beneficiaries. In Jamaica, social safety net programmes like the Programme of Advancement Through Health and Education (PATH) face targeting problems, related to inclusion and exclusion errors; only 56% of the population in

Quantification of the main problem: (i) monetary cost for citizens to access services in the public and private sector (i.e. obtaining a passport, opening a bank account); and (ii) processing time of some critical services in the public and private sector.

Statistical Institute of Jamaica, 2017.

<sup>&</sup>lt;sup>5</sup> Foundational Identification systems provide general identification for many official purposes in contrast with Functional Identification systems which are introduced in response to a demand for a particular service or transaction (i.e. cash transfers, pensions, health cards).

<sup>&</sup>lt;sup>6</sup> Please see <u>Evaluation of the main functional documents used in Jamaica</u> for the quantification of the problem.

World Bank, "Identity for Development. Strategic Framework", 2016.

quintile 1 is in PATH, and only 48% of the population in quintile 2.8 Thirdly, authentication protocols based on national identification registers can contribute to transparency and accountability of public sector institutions, helping in the reduction of leakages, fraud and double-dipping. Jamaica has increased in the last decades the expenditure on social programmes from 0.3% of GDP in 2003 to 0.5% of GDP in 2013. Nevertheless, 66.6% of this expenditure is calculated to be leakages. Overall these leakages account for 0.4% of GDP (0.2% of GDP coming from conditional cash transfers and 0.2% for other social programmes).9 Finally, despite progress made in the last few years the 2016 United Nations e-Government Survey places Jamaica in the 112<sup>th</sup> position, just above Cuba and Haiti in the Caribbean Region (a downgrade of three positions compared to 2014).10 A reliable identification system can facilitate the growth and development of e-government and e-commerce and simplify significantly business transactions for the private sector.

- 2.4 The current identity ecosystem in Jamaica is far from ideal. There are a number of functional documents do not meet the three (3) characteristics of uniqueness, reliability and universality being utilized by various public and private sector entities for identification purposes. In addition, there is the lack of inter-connectivity of the relevant institutions with the Registrar General's Department (RGD), Jamaica's sole repository of birth, marriage and death records, is an important issue for the reliability of these documents. Civil registration, and especially birth registration, is a prerequisite to the acquisition of a national identification document, as the birth certificate serves as the "breeder document" or base document.<sup>11</sup>
- 2.5 Compared to other countries in the region, in Jamaica there is almost gender parity in the access to functional documents. In the case of the Elector Registration Identification Card, 51% of women and 49% of men have been enrolled and therefore are eligible to vote. Esimilar numbers are observed in terms of Passports and Tax Registration Numbers (TRN). However, in terms of civil registration the responsibility of registering newborns is mostly assumed by the mother. Only 28% of birth registrations are done by both the mother and the father, while 72% of the births are only registered by only the mother. Given the limited scope of birth bedside registration in Jamaica, civil registration of newborns implies additional transactional costs for mothers.
- 2.6 The main determinants of this specific problem are:
  - a. The current legal and institutional framework does not provide the required elements for a national identification system. The main issues are: (i) there is no comprehensive legislation about governing identification;<sup>14</sup> (ii) there is an absence of data sharing legislation; and (iii) the provisions for data protection and privacy rights<sup>15</sup> are weak. Regarding the institutional framework, the responsibility for identification is dispersed across different

Information provided through the data base of the beneficiaries of the Ministry of Labour and National Social Security (MLSS) programmes.

<sup>9</sup> IDB, "Savings for Development", edited by Eduardo Cavallo and Tomás Serebrisky, 2016.

<sup>&</sup>lt;sup>10</sup> This index includes both back office and front office aspects of e-government.

<sup>&</sup>lt;sup>11</sup> Secure Identity Alliance, "Civil Registry Consolidation", 2015.

<sup>&</sup>lt;sup>12</sup> Electoral Office of Jamaica (EOJ), Voters' List Certified December 31, 2016.

<sup>&</sup>lt;sup>13</sup> RGD Published Birth Statistics, 2011, 2012, 2013.

The diagnosis related to the legal framework will be included in the Proposal for Operation Development (POD)

<sup>&</sup>lt;sup>15</sup> OPM (2014), "Consultancy for the Provision of a Legal Framework to Support the NIDS Project".

MDAs who do not have identity management as their main responsibility, such as the Tax Administration Jamaica (TAJ) or the Electoral Office of Jamaica (EOJ).

- b. The current civil registry is deficient for the provision of a "breeder document" or base document for the National Identification System (NIDS). Specific deficiencies are: (i) electronic birth bedside registration only being provided in 26% of the hospitals; <sup>16</sup> (ii) 98% of the births occurs in the hospitals <sup>17</sup> but about 20% of them are registered in -in situ- creating additional transactional costs for families; (iii) only thirteen (13) years of historical records are digitized, limiting electronic storage and retrieval of records <sup>18</sup>; (iv) 0% of birth and death records are linked to each other, and neither are records for other life events, which weakens the system's ability to prevent identity theft; and (v) 27% of deaths go unregistered, and for those that are registered, there are issues related to the validity, precision, completeness and timeliness of their registration. <sup>19</sup>
- c. The current Information Communication Technology (ICT) infrastructure is inadequate for the establishment of a national identification system. There are a number of ICT and connectivity issues: (i) the government network connection is limited to some MDAs, relying mostly on internet based connections that lack the requisite security standards for data sharing; and (ii) there is no database for the central storage of biometric information nor the hardware and software necessary for identity management.
- d. The current physical infrastructure is limited from a citizen-centric perspective and is not equipped to capture the information needed to generate a secure identity document. The main issues are: (i) government agencies scattered across the island are not set up to provide a citizen centric service<sup>20</sup> especially outside the larger urban areas; and (ii) although only two (2) institutions, the Immigration and Citizenship Agency (PICA) and the EOJ, capture only one biometric each during enrollment, and the equipment used is outdated.
- e. There are limited identity verification services in the public and private sector.<sup>21</sup> The main problems are: (i) cross- reference checks to ensure the validity of certificates used to obtain any functional document (i.e. TRN, Driver's License, etc.) are not systematic and are limited to one-on-one data sharing agreements between MDAs; and (ii) as each citizen is identified by a specific identity number for each MDA, there is no opportunity to reconcile the information about an individual, increasing the opportunity for double–dipping and fraud.
- 2.7 Therefore, one of the objectives of this programme is to reduce the transactional costs associated with identity verification for citizens to access and providers to deliver services both in the private and public sectors in Jamaica, through the

<sup>18</sup> OPM, "National Identification System, Business Processes Review", 2016.

<sup>19</sup> Vital Statistics Commission of Jamaica, "Quality and Completeness of death registration", 2015.

<sup>&</sup>lt;sup>16</sup> There are 23 hospitals in Jamaica.

<sup>17</sup> RGD, vital statistics report

As revealed in the Assessment of Public Sector Customer Service, capital expenditures are required for better service delivery (lack of space to accommodate customers, queuing systems using Numbers and appropriate service delivery standards).

<sup>&</sup>lt;sup>21</sup> Quantification of determinant: number of one-on-one data sharing agreements between MDA.

establishment of a unique, reliable and universal National Identification System (NIDS). Having identity credentials simplifies the interaction between the citizen, the state and the private sector by removing the burden of proof of identity each time an individual requests services. The NIDS will be a uniform service delivery platform tied to a unique identifier, the National Identification Number (NIN), which will accompany each individual from cradle to grave. The NIDS implementation will require: (i) a new legal and institutional framework; (ii) the implementation of new processes and technologies; and (iii) an important set of activities aimed at facilitating the adoption of the new system by citizens, MDAs and businesses. Furthermore, the reduction in transactional costs, will imply a reduction in the number of trips citizens have to make to public and private sector entities, and therefore have an impact on GHG emissions and the mitigation of climate change.22

- 2.7 Component 1. Implementation of the Legal and Institutional Framework for the NIDS (US\$18 million). The National Identification and Registration Act. 2017 was tabled in Parliament on March 21, 2017 and is expected to be approved by May 29, 2017. The Act will establish (i) the new National Identification and Registration Authority (NIRA); (ii) the framework for the establishment and regulation of the National Identification System (NIDS); (iii) the National Civil and Identification Database, as well as its maintenance and operation; (iv) the assignment of a NIN and the issue of a National Identification Card to such individuals. This component will finance: (i) the activities related to the establishment of the new NIRA, including design for business and revenue model (sources of income, pricing policy, cost projections, etc.), organizational structure, training for new personnel of the agency, as well as hardware and software: (ii) improvement of the civil registry including scaling up electronic birth bedside registration, digitization of all the records in the civil registry, linkage of vital events, and improvement of the death registration process; and (iii) the design and implementation of a communications and change management strategy for the NIDS, focus will be on vulnerable and rural population.
- 2.8 Component 2. Implementation of a unique National Identification Number and NIDS Database (US\$45 million). This component will finance: (i) the implementation of a government wide network to allow inter-connectivity between MDAs and secure data sharing between the government and private sector entities; (ii) the establishment of a central identification management site, including an automated biometric information system; (iii) the establishment of enrollment sites<sup>23</sup> for the new NIDS, including hardware and software for capturing biometric data;<sup>24</sup> and (iv) identification cards production and distribution centers.
- 2.9 Component 3. Streamlined identity verification for public and private sector (US\$5 million). This component will finance: (i) the adoption of identity verification services by MDAs; (ii) training for public sector employees in charge of identity verification; and (iii) service delivery enhancement projects in selected ministries enabled by the NIDS and the possibility to reconcile the information about each individual, like the integration of databases.

Jamaica expressed in the United Nations Framework Convention on Climate Change (UNFCC) its clear objective of reducing GHG emissions stemming from the transport sector.

<sup>&</sup>lt;sup>23</sup> This only includes remodeling of current Government sites.

<sup>&</sup>lt;sup>24</sup> Appropriate service delivery will be introduced for people with disabilities.

- 2.10 Operation Support Technical Cooperation. The Public Capacity Building Korean Fund for Economic Development will provide US\$600,000 for the Technical Cooperation (TC) JA-T1136. This TC will coordinate strategic actions with the main Government entities involved in the implementation of the NIDS, improve their institutional capacity and create linkages between the private and public sectors before commencing the NIDS implementation phase.
- 2.11 The expected results of this programme will be: (i) coverage of the NIDS; and (ii) reduction in the transactional costs associated with identity verification for citizens, as well as public and private sector service providers. The beneficiaries of this programme will be the citizens, the government and the private sector in Jamaica.
- 2.12 Strategic Alignment. This project is consistent with the Update to the Institutional Strategy 2010-2020 (GN-2788-5) and is aligned with the development challenges of productivity and innovation, as well as with the cross-cutting theme of climate change and environmental sustainability, gender equality and diversity and institutional capacity and the rule of law. The programme is also aligned with the Sector Strategy on Institutions for Growth and Social welfare (GN-2587-2); and the 2016-2021 IDB Country Strategy with Jamaica.

#### III. TECHNICAL ISSUES AND SECTOR KNOWLEDGE

3.1 **Executing Agency.** The Executing Agency will be the Office of the Prime Minister (OPM). This is the Government body with a wide enough mandate to ensure proper coordination among all concerned institutions. OPM has previous experience in executing programmes financed by the Bank, being the executing agency for the previous Design and Development of a National Identification System in Jamaica (JA-T1053).

### IV. ENVIRONMENTAL SAFEGUARDS AND FIDUCIARY SCREENING

4.1 According to the results of the IDB "Safeguards Policy Filter Report", and the safeguard and Environmental Policies (OP-703), this operation is classified as Category "C", given the low impact on environmental and social issues.

### V. OTHER ISSUES

- 5.1 **Type of Operation.** As requested by the government this will be an investment operation.
- 5.2 **Retroactive financing.** The Bank may finance retroactively eligible expenses for up to US\$13.6 million (20% of the proposed loan) incurred by the Borrower prior to the date of loan approval. The eligible expenses will be related to the activities specified in Component 1 and 2. These expenses shall be recognized if they satisfy requirements substantially similar to those established in the loan contract. The costs mentioned shall be incurred during the eighteen (18) months prior to the date of loan approval, but in no event will include expenses incurred before the approval of the Project Profile.

### VI. RESOURCES AND TIMETABLE

6.1 It is expected that the Proposal for Operational Development (POD) will be available on May 1, 2017. Approval by the Board is expected by July 12, 2017. The resources needed for project preparation are estimated to be US\$71,960. The staff time needed from project preparation will be 1.28 Full-time Equivalent (FTE) (see Annex V).

# CONFIDENTIAL

The information contained in this Annex is confidential and will not be disclosed. This is in accordance with the "Deliberative Information" exception referred to in paragraph 4.1 (g) of the Access to Information Policy (GN-1831-28) at the Inter-American Development Bank.



## Safeguard Screening Form

### **Operation Information**

Operation				
JA-L1072 Implementation of the National Ide	ntification System for Econo	omic Growth (NIDS)		
Environmental and Social Impact Category	High Risk Rating			
С	{Not Set}			
Country	Executing Agency			
JAMAICA	{Not Set}			
Organizational Unit	IDB Sector/Subsector	IDB Sector/Subsector		
Country Office Jamaica	CIVIL REGISTRIES	CIVIL REGISTRIES		
Team Leader	ESG Lead Specialist			
CAMILA MEJIA GIRALDO	{Not Set}			
Type of Operation	Original IDB Amount	% Disbursed		
Loan Operation	\$0	0.000 %		
Assessment Date	Author			
23 Mar 2017	nathalieh Project Assistant			
Operation Cycle Stage	Completion Date			
ERM (Estimated)	28 Feb 2017	28 Feb 2017		
QRR (Estimated)	1 May 2017			
Board Approval (Estimated)	{Not Set}			
Safeguard Performance Rating				
{Not Set}				
Rationale				
{Not Set}				

### **Operation Classification Summary**

Overriden Rating	Overriden Justification
Comments	



## Safeguard Screening Form

### Conditions / Recommendations

Summary	of	<b>Impacts</b>	/	Risks	and	Potential	Solutions

Disaster Risk Summary

Disaster Risk Level

Disaster / Recommendations

### Disaster Summary

Details

Actions



# Safeguard Policy Filter Report

### **Operation Information**

Operation				
JA-L1072 Implementation of the National Ide	ntification System for Econo	omic Growth (NIDS)		
Environmental and Social Impact Category	High Risk Rating			
С	{Not Set}			
Country	Executing Agency			
JAMAICA	{Not Set}			
Organizational Unit	IDB Sector/Subsector	IDB Sector/Subsector		
Country Office Jamaica	CIVIL REGISTRIES	CIVIL REGISTRIES		
Team Leader	ESG Lead Specialist			
CAMILA MEJIA GIRALDO	{Not Set}			
Type of Operation	Original IDB Amount	% Disbursed		
Loan Operation	\$0	0.000 %		
Assessment Date	Author			
23 Mar 2017	nathalieh Project Assistant			
Operation Cycle Stage	Completion Date			
ERM (Estimated)	28 Feb 2017			
QRR (Estimated)	1 May 2017			
Board Approval (Estimated)	{Not Set}			
Safeguard Performance Rating				
{Not Set}				
Rationale				
{Not Set}				



### Safeguard Policy Filter Report

### Potential Safeguard Policy Items

[No potential issues identified]

### Safeguard Policy Items Identified

### B.1 Bank Policies (Access to Information Policy- OP-102)

The Bank will make the relevant project documents available to the public.

### **B.2 Country Laws and Regulations**

The operation is expected to be in compliance with laws and regulations of the country regarding specific women's rights, the environment, gender and indigenous peoples (including national obligations established under ratified multilateral environmental agreements).

#### **B.3 Screening and Classification**

The operation (including <u>associated facilities</u>) is screened and classified according to its potential environmental impacts.

### **B.7 Supervision and Compliance**

The Bank is expected to monitor the executing agency/borrower's compliance with all safeguard requirements stipulated in the loan agreement and project operating or credit regulations.

### Recommended Actions

Operation has triggered 1 or more Policy Directives; please refer to appropriate Directive(s). Complete Project Classification Tool. Submit Safeguard Policy Filter Report, PP (or equivalent) and Safeguard Screening Form to ESR.

### Additional Comments

[No additional comments]

### **Environmental and Social Strategy**

- 1.1 The general objective of the program is to reduce the transactional costs associated with identity verification for citizens to access and providers to deliver services both in the private and public sectors in Jamaica, through the establishment of a unique, reliable and universal National Identification System (NIDS).
- 1.2 According to the results of the IDB "Safeguards Policy Filter Report", and the safeguard and Environmental Policies (OP-703), this operation is classified as Category "C", given the low impact on environmental and social issues.

### INDEX FOR COMPLETED AND PROPOSED SECTOR WORK

Theme	Description	Status	Reference
Identity Management	Empirical evidence	Elaborated	<ul> <li>Office of the Prime Minister. Business Processes Review of National Identification System, 2016</li> <li>Hurwich &amp; Co. Inc., Assessment of Public Sector Customer Service, 2017</li> <li>American Economic Review, Building State Capacity: Evidence from biometric smartcards in India, 2016</li> <li>Center for Global Development, Using Identification for Development: Some Guiding Principles, 2016</li> <li>Digital Identity: Issue analysis, 2016</li> <li>Bank of Jamaica, Guidance Notes on the Detection and Prevention of Money Laundering and Terrorist Financing Activities, 2016</li> <li>IDBG Country Strategy with Jamaica, 2016</li> <li>Inter-American Development Bank. Saving for Development: How Latin America and the Caribbean can save more for better, 2016</li> <li>Inter-American Development Bank, Diagnostic on Government Digitization Alternatives. Jamaica, 2016</li> <li>World Bank, The identification for development (ID4D) agenda: Its Potential for Empowering Women and Girls, 2016</li> <li>World Bank, Identification for Development: Strategy Framework, 2016</li> <li>Civil Registry Consolidation through Digital Identity Management, 2015</li> <li>Inter-American Development Bank, How much anti-money laundering effort is enough? The Jamaican Experience, 2015</li> <li>Office of the Prime Minister. Communications Strategy, covering implementation and post-implementation of Jamaica's NIDS, 2015</li> </ul>

- Secure Identity Alliance, <u>Civil Registry Consolidation through Digital Identity Management</u>, 2015
- The power of transparency: Information, Identification Cards and Food Subsidy Program in Indonesia, 2015
- Office of the Prime Minister. Economic and Cost/Benefit assessment for the implementation of the NIDS, 2015
- Office of the Prime Minister. NIDS Institutional Framework Plan, 2015
- Inter-American Development Bank. <u>Toward Universal Birth Registration: A Systemic Approach</u> to the Application of ICT, 2015
- Office of the Prime Minister. Provision of a Legal Framework to Support the NIDS Project, 2014
- World Bank Group & World Health Organization. <u>Global Civil Registration and Vital Statistics</u>, 2014
- Office of the Prime Minister. Design and Development of the ICT Architecture for the Planned Implementation of the NIDS, 2014
- Public consultation regarding Jamaica's perceptions, attitudes, opinions, knowledge and decision-making factors pertaining to the concept of implementing the National Identification System, 2014
- Center for Global Development. <u>Identification for Development: The Biometrics revolution</u>, 2013
- Inter-American Development Bank. <u>Identification and Governance Policies</u>, 2011
- World Bank, <u>Identification Strategy</u>. A field experiment on dynamic incentives in rural credit markets, 2010
- Inter-American Development Bank. <u>The Significance of Legal Identity in Situations of Poverty</u> and Social Exclusion, 2009
- Evaluation of the main functional documents used in Jamaica

# CONFIDENTIAL

The information contained in this Annex is confidential and will not be disclosed. This is in accordance with the "Deliberative Information" exception referred to in paragraph 4.1 (g) of the Access to Information Policy (GN-1831-28) at the Inter-American Development Bank.