

The Jamaica Coalition for a Healthy Society

Ministry ▪ Advocacy ▪ Education



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February 23, 2021

Clerk to the Houses
Gordon House
81 Duke Street
Kingston

Dear Madam,

Re: Written submission by the JCHS on the National Identification and Registration Act, 2020

The Jamaica Coalition for a Healthy Society (JCHS) welcomes the opportunity to comment on the captioned Bill. Below are our concerns in brief. This supercedes our submission of January 29, 202.

1. **Is enrolment in fact voluntary?** An overarching concern for the JCHS is that Jamaican citizens must retain the freedom to participate in the economic and social activities of the country. The Government has repeatedly stated that enrolment in the NIDS will be voluntary not mandatory, yet, if enrolment becomes the basis for access to basic services that are currently serviced by existing forms of national identification, or even enhanced and necessary services that are not available to non-NIDS card holders, enrolment will be a requirement in practice, if not de jure. We posit that in a free and democratic society, legitimate involvement of citizens in economic and social activities of the country must not be curtailed by the Government. We therefore are of the view that citizens should not be excluded from economic and social activities if they do not want to participate in the NIDS. As such, if citizens do not wish to enroll in the NIDS, the other current Government issued IDs ought to remain in force and not be phased out.

2. **Impact of the NIDS bill on the Registrar General's Dept (RGD) - Clause 5(2)**

It is proposed that the Registrar-General be appointed by the NIRA with the RGD being under the management and control of NIRA. We are concerned as the remit of the RGD is different from the remit of the NIRA. Is there a way of preserving the independence of the RGD while at the same time allowing for collaboration between the offices?