Maintaining Civil Registration and Vital Statistics during the COVID-19 pandemic

Recommendations for civil registration authorities to ensure operational continuity during COVID-19 and allow for the continued production of comprehensive vital statistics.

These recommendations are issued by the United Nations Legal Identity Agenda Task Force with the support of, and contributions by, UNECA, UNESCAP and SPC.¹ The UN LIA Task Force was established in 2019; it is co-chaired by UNDESA/Statistics Division, UNDP and UNICEF, and is tasked to promote and implement the United Nations Legal Identity Agenda, a holistic approach to civil registration, vital statistics and identity management. An elaboration of this Agenda is available on its website.²

WHY IS COMPREHENSIVE CRVS IMPORTANT DURING PANDEMICS SUCH AS COVID-19?

1. Civil registration is defined, by UN standards as the universal, compulsory, continuous/permanent and confidential recording of the occurrence of all vital events. It is also an invaluable source for comprehensive, regular and detailed vital statistics. Consequently, continuous and universal civil registration and the production of vital statistics are critical functions of government, as civil registration establishes the existence of a person under law. During national emergencies such as COVID-19, these functions should be maintained in order to continue the registration of births, deaths (including causes of death) and other vital events, as well as ensuring the production of accurate statistics on births and deaths.

2. An individual’s legal identity remains of crucial importance during public health emergencies. Individuals need to be able to prove who they are to access public services such as health care, humanitarian assistance, financial aid and other social services. Children who are not registered at birth due to disruptions, such as the current COVID-19 pandemic, are particularly vulnerable – unregistered, “invisible” children may be at heightened risk of violence, trafficking etc. These risks are known to increase during such events. These individuals may carry this disadvantage for years as late and delayed registration processes, and challenges in demonstrating proof of birth, may result in ongoing barriers once the immediate situation subsides. Additionally, the data collected are invaluable sources of key information needed to formulate a government’s policy response during and after pandemics. The privacy of individuals’ data, including those of minorities and vulnerable groups, must continue to be at the forefront of civil registration practices and state intervention.

3. The resilience of the civil registration and vital statistics (CRVS) system during an emergency and its preparedness to manage under such circumstances depends on the nature and scale of the emergency and the strength and capacities of the existing system (including human resources). This will vary depending on the ability of the system to adapt to changing circumstances as well as the size and composition of the affected population, the type of

¹ United Nations Economic Commission for Africa (UNECA), United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP), The Pacific Community (SPC)
Continuity of civil registration as an ‘essential service’

4. Civil registration should be considered an ‘essential service’ mandated to continue operations during a pandemic. Although some physical offices may need to be closed, or opening hours limited or staggered, operations should be maintained as far as possible, whether in-person, or virtual, during the crisis. Depending on the capacity, certain registration processes (such as legitimations) may be put on hold, but registration of births, deaths, foetal deaths and recording of causes of death, should continue as a priority. The guidance below describes how essential/priority services can be maintained during a crisis, as well as services that can be reduced or put on hold.

5. Changes that may need to be introduced:

• Development of a guidance note: The national civil registration office should develop a short guidance note to support registration services to continue their operation during the crisis, in consultation with public health authorities and other concerned authorities. Necessary resources should be provided for the implementation, including ensuring all staff are familiar with the guidance note.3

• Modification in operational arrangements: There may be a need to adapt and make temporary changes to registration processes (e.g. standard operating procedures, business processes or rules), such as:
  o expand eligibility regarding who can notify civil registrars of births and deaths, particularly outside of health facilities;
  o maintain privacy and confidentiality as primary principles under any modification in operational arrangements;
  o consider how verification procedures will be addressed and agreed to going forward, in cases where verification procedures are changed substantially during the crisis;4
  o establish special processes/waivers for persons who may not have the documents that are required for registration, (particularly considering those who are stateless) to ensure that everyone has the necessary documents to access services (e.g. health care services);
  o balance the access to registration with ensuring that the evidence used for registration is robust enough to avoid duplication and/or inaccurate records – trust in certificates issued by civil registration authorities must continue during and after the pandemic;
  o remotely confirm details provided by health notifications with family members or health care providers so that the validation step can be done either at the hospital or followed up by phone with contact details collected at the hospital.

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3 This could include e.g. operating hours, places of operation, contact information, cleanliness of the building, number of people allowed in the civil registry physical organisation to maintain social distancing, review of staff responsibilities and reporting structures, coordination mechanisms, etc. https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/guidance-for-schools-workplaces-institutions

4 For example, for documents issued during this period, additional verification may be needed in the future. at the time of the registration of the next vital event
o suspend fees for registration if charged, to reduce unnecessary physical contact (noting that the UN guidance is that registration of births and deaths in the first instance should be free).

These provisions may require introducing a ‘sunset clause’ for modified operational arrangements, clearly noted, temporary in nature and with a defined end date.

- **Changes in the volume of registrations**: Considering the nature of a pandemic, peaks in death registrations are expected. In the case of COVID-19, changes in the number of birth, marriage and divorce registrations may be expected later in 2020 and into 2021 as a result of the restrictions in movement/lockdowns, depending on the societal context. There may also be an increase in child marriage, and registration plays a role to help ensure this does not happen. Recognising the potential change in the volume of registrations, staff performing other functions in the civil registry could be trained on core registration tasks, and/or plan for addressing a backlog of registrations later.

- **Online provision of services**: Pandemics are the best time to fully embrace and implement online system registration when in existence. If the CRVS system already offers services remotely, those services should be augmented, and the public should be encouraged to use online registration. During the immediate crisis, face-to-face, in-person contact should be restrained wherever possible, and the use of other methods (e.g. email, phone calls, postal mail), and both electronic and printed certificates accepted.

- **Fee waiver for late registration**: Countries should allow for late and delayed registration and implement fee waivers in recognition of the difficulties individuals may experience in accessing registration facilities, particularly if no alternative methods are accessible to facilitate telephone, email or online registration. Similar provisions/measures should be taken after the crisis to ensure potential backlogs are rapidly cleared.

- **Public outreach**: Clear and concise public outreach efforts are required so that relevant Ministries, and national and local registers, can inform the public on what actions are required of them to register their vital events. Governments should consider elaborating the provided guidance for specific population groups such as short-term visitors, persons with disabilities, linguistic groups, minorities, migrants, etc.

- **Protection of staff**: Protection of frontline registration staff and community-based registrars, particularly mobile registrars, is key to ensuring the continuation of services. WHO guidelines can be found here: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance/guidance-for-schools-workplaces-institutions

- **Interaction with other government services**: Civil registration interaction with police, health officials and other authorities is particularly important during this period for discussions on issues such as burial, issuance of documents and identity verification, etc. Procedures for morbidity and mortality coding and recoding should be guided by WHO classifications, including coding instructions for COVID-19: www.who.int/classifications/icd/COVID-19-coding-icd10.pdf?ua=1
Privacy and confidentiality: Any amended process must maintain adherence to relevant data protection and privacy laws. It is essential that emergency measures do not contribute to publicly identifying an infected individual or certain population groups. Where there are clusters of infections among certain populations, actions and communication efforts should not lend itself to discrimination or targeting of individuals or members. Particular attention should be paid to those groups which may already face discrimination such as hard to reach or marginalized communities (e.g. ethnic and language minorities, refugees and migrants).

For more information and support, please reach out to your local UN country teams.

Note:
* This is a working document and will be updated as needed. If you have any suggestions, please contact us via e-mail at un.lia@undp.org.
** This is the first version of the recommendations that they will be updated based on the ongoing survey on national civil registration authorities worldwide.