

**Comments by the Indian groups on
World Bank's World Development Report 2021- "Data for Better Lives"**

To,
The World Development Report Team
The World Bank Group

Dated: 30th June, 2020
Via electronic mail: WDR2021@worldbank.org

Subject: Comments on the World Development Report 2021 – "Data for Better Lives" Concept Note

We, members of Indian civil society, completely reject the intent behind the concept note in which data is identified and presented as a commodity. The concept note is deeply problematic at many levels: it disregards the rights of people over their data and is based on flawed assumptions that have no basis in reality.

The Concept Note, *Data for Better Lives* outlines a framework that enables corporations and the state to profit and advance their particular interests under the guise of public interest, poverty reduction and bettering the lives of people. Data that is built from information about the everyday lives of people will become one of the new engines for economic growth.

Absence of a Meaningful Consultation Process:

1. Timeframe: Given the global health crisis of COVID-19, the timeline of sending the comments by June end is unrealistic. The World Bank has again presented a timeline that suits their schedule, ignoring the challenges presented by COVID 19.
2. Language: The fact that English is chosen as the only language for the consultation process is highly problematic. The fact that the document is only available in English considering the importance of ideas being dealt with in the document shows that there is little importance being given to reaching out to communities which are being claimed will benefit from data reuse or data based technologies. We think it is a deliberate effort to deny people access to this document, despite the shortcomings of it, and despite the Bank having enough resources to translate this into many languages, to get inputs.
3. Lack of meaningful consultation: The fact that there was one web consultation for all CSO's globally during COVID times, and the information of that being given only a day in advance, shows the lack of commitment to genuine consultations.

4. Information only via electronic medium: Using only electronic medium for information and communication automatically excludes a huge section of population from the process. Only a limited section of the population within the internet users also have access to emails and other services. Apart from that in India, the government has used denying access to the internet and information as a political tool to suppress information and deny voice to the people. It's been more than 331 days since seven million residents of Kashmir region in India had regular access to the Internet beyond a handful of government-controlled outlets. It's unfortunate that the World Bank is pandering to these designs of the state.

Flawed and unverified assumptions

We question the mandate the World Bank has for writing the script for how our data is going to be collected, used and how the data flow will be controlled. The entire concept note is drafted on assumptions that infringe upon our fundamental rights. There is complete disregard to the sovereignty of data.

- Firstly, the document assumes data to be non-sovereign and completely disregards the sovereignty of data but also includes data on biodiversity, on people, and resources. What allows the Bank to believe or assume that data is non-sovereign.
- Secondly, there is a presumption that there is such a thing as “public data”. The fact that data generated by governments, and by private firms, built on the personal information and usage of data-based services, is not enough to claim data as “public data”. The data generated belongs to the individual even if it is in the public realm. The way the document is drafted implies that the data will be claimed as ‘public’ irrespective of whether an individual has the intent to share it or not. Personal information and data does not belong to the state or private entities, it belongs to the individual and they have a right to privacy, which is being infringed upon here.
- Thirdly, there is an assumption that usage of the so-called “public data” will aid in development and enhance easy and efficient delivery of services to the poor. We in India have already seen the fallouts of digitalisation of service delivery of public distribution systems, and exclusion of a large number of population from the digital economy.
- Lastly, there is also an assumption that data solutions and digitalisation will work across different socio cultural, demographic, economic and digital connectivity divides. Digital divide is not merely within countries but across countries. Mere acknowledgement of this divide in the note is not enough.

Data as a commodity

Apart from this, the concept note proposes the reuse of all data collected by government and private companies for commercial use. The idea that data is a commodity and commodification of data for the economy is problematic. The concept note refers to data as a new resource. The concept note implies that this is central to the theory of change and that we need to identify impediments for the reuse of data.

Data Protection

There is little deliberation over serious issues like data protection and misuse of data. The concept note propagates with the idea that we can defer certain things like questions around surveillance, privacy etc while we retain certain things. The fact remains that states don't even have policies for data protection in place. Also, there is a failure to understand that data protection is not about data protection alone, it is about protecting people and if it does not protect people it has no meaning or purpose.

In recent times India has seen a curb on democratic spaces to dissent. Archaic laws are being used to curb dissent. Anti-development and anti-national tags are being used to threaten anyone opposing the government over their policies. Arrests of activists and civil society members are the new normal. The checks and balances and of democratic and legislative processes are being undermined. Changes in laws overnight through ordinances and government orders, and aided through the Development Policy Loans have become a common procedure, while these actions are usually taken during a state of emergency! With states turning into surveillance states, questions of data protection and privacy are no longer peripheral issues that need to be the centre point of the debate on data use.

Information Asymmetry

The concept note briefly refers to threats of the accumulation of data by one actor, and the information asymmetries that this creates for other actors which leads to a concentration of power; whether economic or political. We have already seen states and companies misusing the data for competitiveness and state for electoral gains and surveillance in India. Information asymmetry that will be caused with data being used as a commodity and global technology giants/monopolies controlling information, will result in further inequity in terms of power, both for people and those who hold that data and therefore then use, reuse and manage data. There is no clarity in the document as to how these fundamental concerns will be addressed.

Also, the concept note hardly dwells into the reflecting on failures of existing connectivity mediums. Despite the broadband being universal, why are people not being able to access it, how is the data being generated and how will everyone use digital systems despite the demographic, economic and social differences has hardly been looked into.

The document refers to data stewardship, that is; management and oversight of data assets to help provide business users with high-quality data that is easily accessible in a consistent manner” through traditional and new data sources (through private firms). The idea is to bring together different kinds of data to reuse it. This will create new power centres, whoever will control the data will become the new power centre. What would the role of technology giants be then. We have already witnessed technology giants wanting to get into social sectors like education, administration, healthcare etc, and not only provide services but also dictate how these sectors are run. These are issues of paramount importance which have not been dealt with in the document.

The concept note fails to take into consideration the current COVID 19 experiences of countries and vulnerable sections. The fact that the document is neither rooted in experiences of communities nor based on any evidence speaks volumes of the nature of this document . It's unfortunate that the approach of this concept note is limited to business for private companies for which certain power needs to be given to the state and paternalism to the poor. The more significant issues of mandatoriness, state coercion, protection of people is in the peripheral in this document.

Undersigned Indian civil society completely rejects the concept note and objects to the manner and process of consultation and feedback. Above all, this concept note is completely based on flawed assumptions which we categorically reject. We also oppose any move to collect data without the informed consent of the people. There needs to be respect and acknowledgement of these basics before such concepts are forced on people across the globe.

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