Digital Development: An Interpretive Policy Analysis of Privacy and Social Inclusion in World Bank Technology Projects

Siona Sharma

Advised by Dr. Rajesh Veeraraghavan

A Thesis Submitted in Partial Fulfillment of the Requirements for the Award of Honors in Science, Technology, and International Affairs, Edmund A. Walsh School of Foreign Service, Georgetown University, Spring 2020
Acknowledgements

Thank you, first and foremost, to Professors Veeraraghavan and Mendenhall for offering patience and steady guidance throughout the course of my thesis project. Professor Raj, your candor and openness to brainstorming allowed me to constructively narrow the scope of my project and stay true to my original curiosity: the non-technical aspects of technology. Professor Mendenhall, I am indebted to you for your kindness and support; thank you for introducing me to policy analysis and advising me through to the end of this process.

Thank you to the STIA department, both faculty and students alike, especially to Professor Giordano. Oddly enough, the article you assigned me to read on “leapfrogging” two years ago sparked my interest in technology for development. Your support as a professor and friend over the last two years has been invaluable.

Thank you to my many World Bank colleagues, who made time for my interviews and so openly shared narratives and opinions about work at the World Bank. Your passion for the work you do is so clear, and that is the reason I split two years of my time in college between classes and my internship at the Bank. I hope to always carry the lessons I learned from this institution in my career going forward.

Thank you to my dear friends and fellow classmates for being my support network throughout the year, especially to those who patiently edited my drafts and helped me to further my interest in this field. I chose Georgetown to learn from the people who’d be my classmates, and that has held true for the last four years.

Thank you, most of all, to my family. You have always supported me in my academic endeavors, and you have been my foundation throughout college. Thank you for accommodating me so much during the end of this project and ensuring that I can close off my senior year with a sense of accomplishment and gratitude.
Abstract

Despite the growing priority to leverage information and communications technology as a tool of development (ICT4D), governments and multilateral institutions have yet to arrive at a global consensus on adequate digital user protection standards. As a result, ICT investments have often yielded data breaches, created digital divides, and unanticipated socioeconomic impacts that limit positive impact to consumers. The World Bank, a leading development institution since 1944, has played an influential role in the conversation on user protection standards, both as an active ICT4D investor and consultant for countries drafting technology legislation. Noting the institution’s influence in shaping global ICT user protection standards, the World Bank’s leadership on implementing and developing its own policies for ICT projects can serve as a model for effective ICT4D governance. This thesis uses Dvora Yanow’s interpretive policy analysis (2000) to capture the discourse on ICT4D policy frameworks between three World Bank policy-relevant publics: managers, designers, and implementers. Specifically, this thesis examines the ways World Bank actors frame the policy issues of ‘privacy’ and ‘social inclusion’ in ICT; interpret and apply the institution-wide ICT4D policy; and relate their framing of policy for future international user protection standards governing ICT4D. This thesis argues that, while World Bank actors do not uniformly apply privacy and social inclusion to their projects, they do share the values of ‘innovation’ and ‘provision’ in technology projects. Each policy-relevant public independently balanced social inclusion and privacy against innovation and provision to accomplish their shared goal of sustainability in a project. This thesis recommends that, for the current World Bank framework to be more effective and uniformly applicable for World Bank stakeholders, it should frame privacy and social inclusion within the context of shared goals of innovation and provision. Specifically, a revised policy should acknowledge that ‘privacy’ and ‘social inclusion’ contribute to the goal of sustainability and allow for the widespread provision and innovation of technology. This World Bank case study lends further insight into the challenge of finding global consensus in ICT regulation, and contributes one layer of shared values in community discourse to inform the international discussion on user protection in ICT4D.
Section I: Introduction

As a tool for international development, technology is often implemented with the implicit understanding that increased access is always a public good; however, this attitude poses risks in an increasingly connected age. Information and communications technology for development (ICT4D) has long been viewed as an “instrument for social and economic gains” in countries that seek to reduce poverty and mortality rates and equalize social autonomy (Avgerou, 2010). According to the United Nations, information and communications technology (ICT) is critical to complete each of the seventeen U.N. Sustainable Development Goals (SDGs) that comprise the current international development agenda. In fact, further mobilization of existing technology could even accelerate current progress towards the SDGs by 22 percent (ITU; SMARTer 2030, 2019). By leveraging a digital biometric identity system, India integrated technology into its governing infrastructure in less than a decade, uniformly expanding access to public services and loans to over one billion citizens (Dixon, 2017). Myanmar, despite political crises, widened the public’s access to information as Internet connectivity increased from less than 0.5 percent of the population to 89 percent in ten years (Poveda, 2018). On the institutional side, key development organizations including the United Nations Development Programme (UNDP), World Bank, and World Economic Forum (WEF) have championed information and communications technology as a means to improve lives for the last twenty years (United Nations Development Programme, 2001; World Bank, 1999; Dutta et al., 2009). The critical role of technology in development, specifically as a means to improve economic outcomes and social equality, is reflected in global efforts to expand digital access.
The United Nations 2030 Development Agenda confirms the importance of considering social equality as a measure of development success. Central to the current development agenda is the tenet of social inclusion. Prior to 2015, the United Nations did not emphasize user protection in development outcomes, failing to fully protect beneficiaries against increased social disparity and human rights violations (United Nations A/RES/70/1). To combat the negative effects of development, the United Nations implemented policies to ensure that all international development efforts be more human-centric and socially inclusive (United Nations A/RES/70/1). The Agenda also outlines the importance of protecting human rights, and makes it a central goal of development outcomes. With specific regard to technology rights, the United Nations Human Rights Council reaffirmed privacy as a key human right in the digital age (United Nations A/HRC/69/167). Beyond institutional concern, several studies suggest that beneficiaries of ICT4D projects inherently value social inclusion and privacy protection. When a development project violated either principle, interviewees often identified technology as being the source of social inequalities or vulnerabilities they felt in their communities (Caribou Digital, 2017; Poveda, 2018; Mink et al. 2018). It is widely accepted both at an institutional and local level that technology has the capacity to improve social inequity and enjoyment of human rights (Independent Evaluation Group, 2012; United Nations A/RES/70/1; Caribou Digital, 2017). However, the implementation and regulation of technology use, if not developed with social inclusion and privacy in mind from the outset, can broaden the very inequalities it intends to address for its users (United Nations A/HRC/28/29; Independent Evaluation Group, 2012).

In practice, the principles of social inclusion and privacy have not been easily protected. In the years following the implementation of digital infrastructure for development,
unanticipated consequences have posed an equity challenge for user populations. For Aadhaar, India’s digital identity system, the violation of citizens’ rights to privacy became a national issue of concern following significant data breaches in 2017 that risked citizens’ personal information. In 2018, when the issue was elevated to the Supreme Court of India, it was difficult to substantiate privacy violations by the platform—due, in part, to the lack of Indian privacy legislation (Puttaswamy, 2018). In Myanmar, on the other hand, a study examining the impact of technology found that women are much less likely to be mobile phone owners or digitally literate, especially in low-income households. Women’s unequal access to technology, compared to that of men, has exacerbated gender inequalities; limited women’s social and education opportunities; and thus widened the gender gap that technology access was expected to reduce (Poveda, 2018).

The examples in India and Myanmar are two of several case studies in development that demonstrate a concept known as the “digital divide.” The digital divide was originally used to describe the difference in equality between those with and without access to information and communications technology (Warschauer, 2004). However, the theory of the digital divide has since been modified to convey the notion that inequalities are more a result of the way information and communications technology is integrated in a community, rather than merely whether technology is provided to a community (Warschauer, 2003). The revised definition recognizes that digital divides created between technology users are based on a number of demographic and social factors: gender, nationality, societal autonomy, familiarity with technology, and socioeconomic position, among others (Keniston & Kumar, 2004). The practice of identifying and anticipating further digital divides as a result of development technology
projects, however, is still a significant challenge for all countries, despite preliminary resolutions drafted by the United Nations to emphasize the valuation of privacy and social inclusion.

The valuation of privacy and social inclusion is especially critical to uphold human rights. The United Nations calls upon all states to “put an end” to violations of people’s digital rights and revise their legislation to fully comply with international human rights law (United Nations A/RES/68/169). Nonetheless, continued reports of privacy breaches and growing digital divides suggest a disconnect between the United Nations’ recommendations and the user protection principles governing ICT for development projects in practice (Unwin, 2010). Many analyses of ICT for development attribute the tension to the lack of a clear international framework for legislating digital user protection (Mthoko & Khene, 2018; Hoffman, 2012; Dixon, 2017).

As a result of an unclear international framework, different countries have varying legal standards to protect technology users’ rights. In fact, several countries do not yet have robust national legislation governing their national technology implementation (UNCTAD, 2020; DLA Piper, 2020). As of January 2019, only 58 percent of countries had data protection and privacy legislation, despite privacy being one of the most critical consumer concerns (UNCTAD, 2020). Furthermore, government officials and international leaders have recognized ‘social inclusion’ in technology to be a multiplier for positive development outcomes, but technology regulation to mitigate social inequalities has been a challenge to implement in legislation (Seth, 2019). In the case of ICT4D, the cross-country nature of projects often adds further ambiguity to the ethical framework that needs to be considered when implementing technology (Galperin, 2010). Projects in ICT4D, especially if led by multilateral institutions, tend to work across borders in
multiple countries. However, uniformly implementing one project in several countries poses a
challenge, because user protection legislation in countries is not uniform and often highly varies
from country to country (Galperin, 2010). Thus, the responsibility of developing a user
protection framework falls on the implementing stakeholders, namely country governments and
multilateral institutions (Unwin, 2010). As multilateral development institutions invest in
projects around the world, they can often act as an influence for international frameworks for
development issues like ICT (Fukuda-Parr, 2017). Just as the United Nations sets digital privacy
and social inclusion as priorities for user protection, these institutions can recommend user
protection frameworks that shape technology-related legislation in partner countries (Clemens &
Kremer, 2016).

Historically regarded as a leader in international development (Vetterlein, 2011; Barnett
and Duval, 2005; Bazbauers, 2017), the World Bank has invested in over 1,500 projects with
ICT components, accounting for over 70 percent of their total investments (World Bank, 2012).¹
As of 2018, the World Bank committed $1.28 billion to projects solely focused on digital
development, focusing on technology as a means to achieve the Bank-wide twin goals of ending
extreme poverty and boosting shared prosperity. Along with implementing projects, the World
Bank makes user protection policy recommendations to partner governments, often helping
countries write legislation to ensure technology user protection for their citizens (World Bank,
2019). To guide its ICT undertakings, the World Bank set a three-pronged ICT strategy for the
years 2012 to 2015, establishing an institutional framework for issues of user opportunities and
protection in digital projects. The framework’s priorities, “Innovate,” “Connect,” and

¹ As per the most recent ICT development strategy and measurement in 2012. Figures are still used on current World
Bank ICT websites.
“Transform,” detail the goals of World Bank ICT interventions, upholding concepts of privacy and social inclusion to decrease digital divides (World Bank, 2012). In 2018, the World Bank set in place the Environmental and Social Framework to establish mandatory standards for social inclusion and sustainability in all World Bank investments (World Bank, 2018). In particular, the framework details ten environmental and social standards that must be maintained for a project and lender to receive World Bank support. Since then, the World Bank has referred to these frameworks in its digital development practice to guide World Bank project frameworks and ultimately shape the legislation of countries around the world (“Digital Development,” 2019).

However, the breadth of digital development expands across various sectors, which, at best, results in only a broad application of the World Bank’s institutional user protection framework (Independent Evaluation Group, 2012). The most recent evaluation of World Bank ICT projects partially attributes ineffective ICT outcomes to an unclear principles-based framework, indicating that actors in World Bank projects, or “interpretive communities,” conceive of user protection principles in different ways (Independent Evaluation Group, 2012). Some ICT4D project leads prioritize social inclusion and privacy standards, acknowledging the importance of effective integration for digital development projects to have full impact (“Digital Development,” 2019). Others prioritize the widespread and affordable provision of technology,

2 In the detailed description of each pillar of “Innovate, Connect, and Transform,” the World Bank includes adaptation of legislation to protect privacy, prevention of information misuse through privacy, equal access to opportunity, empowering all local actors, and an “enabling environment,” among other characteristics of privacy and social inclusion.

3 The Environmental and Social Framework was developed directly in response to the United Nations’ aforementioned call to institutions and governments to end violations to human rights (World Bank, 2018).

4 For detailed highlights of the World Bank ICT4D policies, please refer to Tables 2 and 3 in the Appendix.

5 The Independent Evaluation Group defines an “ineffective ICT outcome” as the result of a project that fails to meet its stated objectives of user reach, local actor involvement, equitable opportunity for demographics, etc.
weighing the net positive impact of digital access over the potential vulnerabilities created by technology itself (World Bank, 2018). The differing perspectives of stakeholders within the World Bank suggests multiple interpretations of the principles of “privacy” and “social inclusion,” which informs how the World Bank ought to communicate and monitor an overarching ICT user protection strategy—if at all—in the future.

Current literature written both within and outside of the World Bank discusses the collective impact of the World Bank’s influence in other countries through both technical assistance and policy recommendations. However, the existing literature acknowledges but fails to address the discourse on user protection between the World Bank’s own internal stakeholders (World Bank, 2018; Güven, 2018; Clemens & Kremer, 2016; Bazbauers, 2017). Both academic literature and World Bank reports have largely focused on the evolving ethical lessons of ICT4D as informed by the results of impact assessments (World Bank, 2012; Bazbauers, 2017). Literature also focuses on the pressing need to account for stakeholder perceptions of user impact in ICT, as well as the impact of World Bank ICT projects on country policies for user protection (World Bank, 2012; Güven, 2018; Bazbauers, 2017). Moreover, IC theoretical literature on nonspecific to the World Bank discusses that the framing, design, and deployment of ICT projects requires a common underlying ethical framework to mitigate undesirable outcomes of projects (Friedman et al., 2013; Seth, 2019). These scholars have underscored the necessity of discourse and consensus between ICT projects’ stakeholders, but these concepts have yet to be discussed with respect to ICT at the World Bank.

This thesis will analyze the different perspectives of World Bank digital development stakeholders on ethical frameworks for ICT4D. Specifically, this thesis will ask: How do World
Bank interpretive communities label and frame the issues of ‘privacy’ and ‘social inclusion’ as they apply to ICT projects? How does their framing of these policy issues suggest their acknowledgement and opinion of the World Bank-wide ICT strategy? What implications does their framing have for future international user protection standards governing ICT4D both within and outside of the World Bank? This thesis argues that interpretive communities in the World Bank frame and apply privacy and social inclusion to ICT differently, by weighing them against their shared values of ‘provision’ and ‘innovation’ in technology. Specifically, all three communities shared the view that ‘provision’ and ‘innovation’ are necessary to ensure their shared goal of a ‘sustainable project.’ However, the communities generally agreed that World Bank policy does not communicate privacy and social inclusion in the context of shared goals. Furthermore, stakeholders do not uniformly apply the Work Bank policy framework to ICT projects and often felt that policy interpretation and balancing priorities was left to them. Therefore, the communities agree that a World Bank policy framework that frames ‘privacy’ and ‘social inclusion’ within the context of ‘provision’ and ‘innovation’ would make policies clearer and more agreeable for stakeholders to uniformly implement. ‘Privacy’ and ‘social inclusion’ must be framed as shared goals for stakeholders who all want to see sustainable outcomes for their projects.

This thesis captures the varying perceptions and strategies of World Bank interpretive communities that collectively constitute the World Bank’s ICT4D impact. The World Bank’s projects and investment in ICT4D have rapidly evolved in the last ten years, as has its widespread impact on international policies for user protection (World Bank, 2019). This thesis appeals to the strategy-writing community within the World Bank to consider the effectiveness
of a unifying framework for ICT4D projects. Moreover, this thesis appeals to the greater policy-making community to utilize these interpretive communities viewpoints to inform the international discussion of how ethical frameworks ought to be developed for user protection in the future.

**Methods Overview / Context**

Considering the ambiguity of user protection standards in practice, this analysis seeks to identify the gaps in the World Bank ICT policy framework and policy recommendations that govern information and communications technology projects and their impact. To analyze these gaps, this thesis employs policy analysis to understand not only the policies themselves, but their interpretations and applications by policy stakeholders. Interpretive policy analyses recognize that policy issues are influenced by policy actors, and analysis of policy application cannot “stand outside” of the policy issue being studied (Yanow, 2000, p. 6). By utilizing Dvora Yanow’s interpretive policy analysis framework (2000), this thesis analyzes the perspectives of actors who influence the execution of World Bank digital development projects, and how World Bank stakeholders assign meaning to ‘privacy’ and ‘social inclusion’ for ICT4D in different ways (Hoffman, 2012). These “communities” emerge from their shared discourse and perceptions of the political issue of World Bank-led ICT4D governance and the impact felt by end users (Yanow, 2000). This policy analysis specifically considers the perspectives of managers, designers, and implementers of World Bank digital development projects. Political interpretive analysis identifies the three aforementioned groups as “policy-relevant publics” (or “interpretive communities”) for the issue of user protection standards, seeking to understand

---

6 The full discussion of Methods can be found in Section III.
7 The terms “interpretive communities” and “policy-relevant publics” will hereafter be interchangeably used (Yanow 2000).
how the communities differ in the way they frame privacy and social inclusion in ICT4D projects (Yanow, 2000). This thesis determines the communities’ interpretations of user protection policy issues through interviews, World Bank documents and reports, speeches, and digital development blogs.

To identify discourse between the three identified policy-relevant publics, thirty current World Bank employees took part in semi-structured, qualitative interviews between June 2019 and January 2020. These interviews aimed to capture how each interpretive community prioritizes user protection standards in their perceptions of effective ICT4D governance. The interview subjects were categorized based on their listed World Bank titles, as well as where their role was situated in various levels of ICT4D governance: managing sectoral digital development initiatives; designing individual projects; and implementing projects with country governments. During a period of increased attention to and expansion of ICT4D within the World Bank, these three communities offer different interpretations of the user protection standards that must be prioritized in ICT4D going forward.

This thesis contextualizes the historical use of technology as a tool for international development. It builds upon these concepts by presenting the concurrent evolution of technology ethics, and efforts to ensure user protection from unanticipated consequences. Moreover, the review discusses theorized answers to the unresolved question of how to effectively measure technology impact to end users, especially the recent consensus that a human-centered approach is critical for impact evaluation.
Section II: Literature Review

International development has long been a tool to build equity across world populations by upholding individuals’ rights and freedoms in the presence of institutional globalization and modernization (Sen, 2001). Despite the different rates of economic and political growth in each country, the international community has defined human rights that must be equally protected for all individuals, and the furthering of Sustainable Development Goals sits at the heart of the international development agenda (United Nations, 2015). The Sustainable Development Goals endorse rights to privacy and social inclusion as fundamental human rights, and these rights are often both improved and impacted by welfare technology (United Nations, 2015). Over the last twenty years, the use of technology as a global means to conserve human rights has widened exponentially, because technology is a platform for infrastructure that is both affordable and deployable across large and geographically-disconnected populations (Mthoko and Khene, 2018). ICT for development has the capacity to improve socioeconomic outcomes for both individuals and communities, and it often fills the gap of infrastructure in countries that seek to “leapfrog” their progress to meet a modernizing world (Sen, 2001). ICT4D is currently being expanded across countries to provide internet and mobile connectivity, access to public services, and verification of identity, amongst other fundamental welfare services to individuals (Hoffman, 2012). However, as the capabilities of technology constantly increase and remain retroactively regulated, the interaction of technology and individuals will have increasing implications for both individual end-users of technology and the environments they live in (Avgerou, 2010; World Bank, 2018).
Luciano Floridi developed one of the first theories that weighed the social impact of technology, maintaining the concept that the technology was not a tool within a society, but rather, an entire facet of society that should be considered as a part of the larger ecosystem of society: the “infosphere” (Floridi, 2014). Though technology may be used as a means to protect individual rights, the use of technology creates new rights that must be upheld for its users (Floridi). In the case of development technology, its use is most frequently centered around identity and personal information collection. Technology ethics must therefore acknowledge that individuals in the “infosphere” have a right to express, exchange, and maintain their personal information (Floridi). Regulation of technology to protect individual rights is especially a priority in the context of development, given the historical and international implications of cross-country aid. Goulet argued in 1975 that information communications technology for development was founded with the intention of promulgating neocolonialism, because the donating country provided a tool to a recipient country that was limited in its ability to adapt the technology entirely to its own needs. This is supported by the historical fabric of international development institutions and multilateral organizations that were created to continue exercising external influence over “newly developing countries” after the end of World War II (Neu & Gomez, 2006). Goulet’s perspective fits in a larger narrative on soft power, which has found that institutions working for the “public benefit” of other countries, especially in an international context, support the full-process design and provision of aid that furthers their own national values that define freedom and modernization (Nye, 2009). Given that technology in a development context is often designed overseas with foreign lending institutions, approved by the borrowing government, and then implemented with a top-down approach with reach into
local communities and homes, the process of deploying information communications technology spans across borders and permeates all levels of society. As such, the approach to regulation and ethical considerations of ICT4D projects must be sensitive to the macro- and micro-level scales of impact and power dynamics between stakeholder parties.

Several studies have examined the values that must be protected at each stage of development technology’s development cycle, by each involved party—primarily designers, policymakers, and implementers. Hoffman (2012) shows that challenges arise from ICT4D as a result of multiple stakeholders having different goals, given that each stakeholder owns a different part of the development process for one technology project. Studies show that the impact of varying priorities is primarily experienced by end users; there is a general consensus in welfare technology literature that “digital divides” are felt amongst users when technology is not uniformly implemented, thus resulting in social discrimination and unintended consequences that create inequalities (Hoffman; Keniston & Kumar, 2004; Galperin, 2010; Warschauer, 2003). The “digital divide” was originally termed to describe the difference in equality between those with and without access to technology; however, it has since been modified to recognize the digital divides created between technology users based on their agency, familiarity with technology, and socioeconomic position (Keniston & Kumar, 2004). As a result, the academic community has been specifically concerned with the questions of privacy and social inclusion to consider the interactions between development technology and its users so as to ensure a more uniform experience for impacted parties (Hoffman).

Many studies that examine the unanticipated impacts of technology assert that managers, designers, and implementers of welfare technology must prioritize the end-user in their part of
the process, specifically through the two aforementioned principles of privacy and social inclusion for end users (Hoffman, 2012; Mink et al., 2018; Dixon, 2017). Mink, Diehl, and Kandachar highlight the role of values in designing ICT4D projects; they assert that beyond filling the criteria to deploy functional and efficient technology, stakeholders at every stage of ICT4D project development should build technology projects keeping the impact to end users in mind. This, they suggest, will allow project stakeholders to make more informed decisions on accessibility, use and misuse of their technology, and valued outcomes of the large-scale deployment of a project (Mink et al.). Therefore, the capability approach used in literature to assess development outcomes should also be used as criteria to design technology projects within the context of international development (Mink et al.).

Amartya Sen suggests in his capability approach to development that the evaluation of resources in a development context should be valued by how much a resource can add to a society’s well-being (1999). Sen defines well-being as a set of functionings that individuals in a community have reason to value; therefore, the addition of resources will fit into this framework and do not function uniformly in every context of redistribution. He maintains that resources deployed in a development context alter a person’s functionings and decisions for well-being, but also is anchored around their choice to utilize a resource to a certain degree. His approach shows how technology regulations must prioritize technology implementation by keeping end users at the center of technology development and evaluation (Kleine, 2011). The capability approach has been supported by digital ethicists as one of the most useful approaches to technology regulation (Mink et al., 2018; Johnstone, 2007; Smith et al., 2011). Johnstone asserts that technology must be evaluated from a starting point of human capabilities and functionings, then
modified to understand how technology adapts those capacities. The current framework of technology impact is too utilitarian, she states, and neglects to consider the changing context and social circumstances of a deployment of technology (Johnstone). This is especially significant in the development context, as the implementation of technology differs in various communities based on the capabilities of that community. This approach to regulation keeps people at the center and, unlike Floridi’s theory, does not value information itself, but more so the ability of information and technology to impact people’s capabilities.

The process of regulating and measuring impact, however, is still an immeasurable challenge. Some scholars assert that expected versus actual outcomes of technology cannot be one and the same, but the intentions of a project prior to its deployment ought to then follow regulatory principles (Kleine, 2011). World Bank reports confirm this in their own reports on ICT (World Bank, 2012; 2018). Grunwald (2000) also maintains that regulation of technology after deployment reduces the engagement of implementers during the project design stage, and only serves to reprimand technology’s stakeholders without preemptively addressing the unintended impact on a society. Therefore, literature supports that the regulatory approach to user protection standards in development must be principles-based, in order for it to be interpreted on a specific, case-by-case level and followed prior to a technology’s implementation in a society (Grunwald; Kleine; Johnstone).

This discussion of digital ethics is particularly pertinent for multilateral institutions, specifically the World Bank. The World Bank has been recognized as occupying a historical role of maintaining “global, social responsibility” in navigating the ambiguities and tensions of ethics while monitoring development projects (Neu & Gomez, 2006). It has been recognized both in
World Bank reports and external literature that World Bank projects cannot often fit the same standard upon implementation in a community, given the diversity in approaches and demographic factors when technology reaches a community (Neu & Gomez; Independent Evaluation Group, 2018). However, the World Bank does have autonomy over the governance of the process of designing, building, and planning for the implementation of information communications technology for development projects (Neu & Gomez; World Bank, 2012). Especially given that user protection laws are not uniform and robustly developed in several countries, the World Bank’s own regulations often influence legal regulations developed in client countries (DLA Piper, 2019). This is a priority of utmost importance considering the widespread influence of technology tools for development in society. Surden (2007) presents the concept that society relies on structural constraints, certain mechanisms of society, to protect individuals’ rights without explicitly naming and protecting those rights. Issues of privacy and social inclusion were long maintained through obscurity, or opt-in digital options, for individuals in a less-digitized world, but now, the recognition of lost structural constraints should prompt policymakers to develop explicit legal rights for technology users (Selinger & Hartzog, 2017). Careful attention to structural constraints that previously protected policy will allow policymakers to identify the risks to privacy through preemptive rather than reactionary policy. For the World Bank to be able to anticipate impact to communities and adequately protect end users’ rights, it is imperative to understand how the institution’s policy frameworks shape stakeholder priorities at each step of the technology development cycle.
Section III: Theory and Methodology

*Interpretive Policy Analysis*

This thesis utilizes Dvora Yanow’s interpretive policy analysis (2000) to reveal the user protection standards that are framed and prioritized by ICT4D stakeholders. The interpretive policy approach qualitatively analyzes how interpretive communities assign meaning to the policy issues that they influence but also are impacted by (Yanow, 2000). In this thesis, “privacy” and “social inclusion” are evaluated as policy issues that shape user protection standards for ICT4D. Interpretive policy analyses are applied to further understand the meaning of policies to policy-relevant publics, including policymakers and implementing agency personnel. These groups are categorized based on their shared thoughts, actions, and conceptions of policy issues (Yanow, 2000). For this interpretive analysis, thirty World Bank employees from the digital development practice participated in semi-structured interviews. They are sorted into three policy-relevant publics: managers, designers, and implementers.

Interpretive analyses reveal how policy is manifested in practice; which tensions rise from interpretive communities operationalizing policy issues differently; and whether policy revision is necessary to incorporate the critical viewpoints of stakeholders (Yanow, 2000). Utilizing political interpretive analysis, this thesis seeks to understand the framing of user protection standards through three questions for each policy-relevant public:

1) How do World Bank interpretive communities label and frame ‘privacy’ and ‘social inclusion’ as user protection standards in ICT?

2) How does their framing of these policy issues suggest their acknowledgement and cohesive integration of the World Bank-wide ICT4D policy?
3) What implications does their framing have for future international user protection standards governing ICT4D both within and outside of the World Bank?

This thesis lays out the varying interpretations of policy issues by interpretive communities, acknowledging the lack of rational consensus and inconsistent framing of user protection standards. The purpose of a political interpretive analysis is to understand the discourse between each interpretive community to inform the broad conversation surrounding a policy issue (Yanow, 2000). This approach is particularly relevant to contribute further insight into user protection standards, a technology policy area that has not yet arrived at a general consensus.

Political interpretive analysis entails a five-step process to understand how each policy-relevant public frames political issues: in this case, “privacy” and “social inclusion” in technology (Yanow, 2000). First, political artifacts (language, symbolic objects, and acts) must be identified in the context of the meaning (values, beliefs, feelings) they hold for each public; secondly, the specific policy-relevant publics that interpret and develop political artifacts for a policy issue must be distinguished. In practice, these first two steps occur alongside each other (refer to Figure 1). Thirdly, to draw out the meanings important to each community, community discourses must be identified; specifically, the analysis must consider how each interpretive community talks and acts with respect to the issue. This can be identified by understanding the meanings attributed to each political artifact, for instance, through interviews. In the fourth step, the analysis identifies the meanings that differ between communities for each artifact. Lastly, the interpretation of points of tension between meanings can lend understanding to differences in framing and consequent implications. This thesis draws upon this process for its research design framework to analyze the issues of user protection standards.
Research Design

In order to examine the varied framing of this political issue, this analysis highlights the concepts of privacy and social inclusion as two central components of end user protection, specifically for those impacted by World Bank ICT4D projects. This thesis utilizes Alan Westin’s (1967) definition of “privacy” as:

“The claim of individuals, groups, or institutions to determine for themselves when, how, and to what extent information about them is communicated to others.”

Westin’s definition of privacy was chosen because it (i) highlights the agency of the individual in defining what information exchange is valuable to them and (ii) alludes to the fluid scope of

---

8 This definition of privacy has long been cited in literature as the foundational definition of privacy in technology ethics. It is worth noting that Alan Westin is regarded as the founder of privacy law, and frequently wrote and testified about the importance of privacy in internet governance— in newspapers and journals, to Congress and lawyers— thus suggesting that the development of technology has certainly outpaced its regulation (Fox, 2013).
privacy when established by various stakeholders. Furthermore, this thesis utilizes Mark Warschauer’s (2003) definition of “social inclusion” as follows:

“The extent that individuals, families, and communities are able to fully participate in society and control their own destinies, taking into account a variety of factors related to economic resources, employment, health, education, housing, recreation, culture, and civic engagement.”

Warschauer notes that social inclusion “overlaps with the concept of socioeconomic equality, but is not equivalent to it (p. 8).” This definition is relevant for this analysis because it acknowledges that agency is a component of inclusion, suggesting the value of a user-centric focus of technology governance. It also alludes to the extent to which technology impact can permeate different aspects of a user’s life, further affirming how critical but yet challenging it is to ensure user protection in practice. This thesis refers to both definitions to examine the extent to which interpretive communities frame these principles. Especially since both definitions emphasize the flexibility of both principles, Given the flexibility of both principles, the interpretive policy analysis emphasizes the importance of framing based on the context of these issues experienced by stakeholders.

Steps I and II: Identifying Artifacts, Meanings, and Interpretive Communities

The first step of mapping policy issued is identifying political artifacts and the interpretive communities that are carriers of meaning for a policy issue. In order to begin this, Yanow suggests methods for accessing the sources of “local knowledge” that reveal symbolic artifacts (symbolic language, objects, and acts) representing policy issues- specifically document analysis, conversational interviews, and participant observation (Yanow, 2000).
Yanow (2000, p. 42) proposes analysis of “symbolic language” as one method of accessing local knowledge about policy issues. She suggests metaphorical analysis as one means of analyzing symbolic language data, proposing that language can be both descriptive of a policy issue and representative of a “prior, unarticulated understanding” of the policy issue (Yanow, p. 44). Yanow also suggests categorization as another means of analysis, recommending attention to the groupings of policy elements by shared characteristics and differentiated boundaries. Interpretive policy analysis also utilizes symbolic objects, or the physical artifacts that are a result of enacted policy language. Yanow (p. 45) describes “programs” as representative of policy issue priorities. Finally, “symbolic acts” are actions by interpretive communities to signal the importance of a policy issue. Often, acts of policy-setting, conferences and hearings, and service delivery of a policy represent meanings for policy issues (Yanow). The way that policy-relevant publics act and interpret these acts lends further insight to their framing of a policy issue (Yanow).

The documents, or written language, analyzed for this thesis include both resources and knowledge repositories for World Bank Digital Development projects, listed as “Research” on Bank websites. The projects themselves serve as symbolic “objects” that represent the priorities of the institution, and the language in these documents is analyzed to understand how the policy issues are formally drafted and framed by each community.

To collect further data, I interviewed thirty World Bank employees, each of whom execute different stages of Bank-wide digital development. Interviewees were categorized into three identified policy-relevant publics: managers of initiatives within digital development, designers of project investments, and implementers, often employees working in the field to
oversee execution and monitoring. The interpretive communities (managers, designers, and implementers) were grouped based on the roles of interviewees’ job functions, the categories implied in World Bank documents, and Yanow’s own interpretations of relevant interpretive communities (Yanow, 2000, p. 15). “Managers” were responsible for the oversight of a digital development project or ICT4D initiative within the World Bank. “Designers” include the economists and analysts responsible for translating investments into actionable projects and requirements for a client government. “Implementers,” often on the ground in other countries, work with client governments and local stakeholders to execute a project and ensure infrastructure for monitoring and evaluation. The responses and language used by interviewees is analyzed as a source of symbolic language to reveal policy framing. With regard to symbolic acts, the analysis considers the actions of actors through project design and implementation, as well as impact.

Finally, as a World Bank intern from May 2018 to January 2020, I included one component of my participant observation to inform the analysis. As attendee of the World Bank’s Law, Justice, and Development Week 2019, I used speeches from the annual legal conference to collect additional World Bank perspectives on the conference’s selected theme: rights, technology, and development. In contrast to the conversational individual interviews, these speeches conveyed interpretive communities’ public, prepared discourse through their speeches. The conference was analyzed as a symbolic act that signalled the priority of ICT4D rights at the World Bank, and the symbolic language of the speeches was analyzed to understand the presented perspectives on the policy issues as explained by World Bank actors.
**Step III: Identifying Community Discourse**

The third step of the interpretive policy analysis identifies community discourse on privacy and social inclusion between World Bank digital development interpretive communities. To identify community discourse is to understand how communities talk and act with respect to the policy issues at hand (Yanow, 2000). By examining community discourse, the policy analysis seeks to convey the “values, beliefs, [and] feelings”—or policy issue meanings—that are significant for each policy-relevant public (Yanow, p. 20). The meanings of policy issues for each community are gleaned from the policy artifacts identified in Step II, because, Yanow suggests, policy meanings are “embedded” in policy artifacts and difficult to access directly (Yanow, p. 20).

To draw out the discourse of each interpretive community, the interview and speech transcripts were analyzed using a coding scheme to determine the framing of privacy and social inclusion. The analysis is divided into three sections, each of which highlighted the thematic concepts of each main question asked:

1. Framing of “privacy” and “social inclusion” in ICT;
2. World Bank ICT4D policy application;
3. Future policies for ICT4D.

The analyses in each section seek to lend insight into: (i) how interpretive communities frame privacy and social inclusion as user protection standards in ICT; (ii) how each community applies and perceives World Bank’s policy frameworks for user protection; and (iii) what each community determines is necessary for cohesive World Bank ICT4D policy and user protection

---

9 Refer to Tables 4, 5, and 6 in Appendix for the coding scheme utilized.
10 The World Bank policies on ICT are described in detail in the Appendix; refer to Tables 2 and 3.
legislation in the future. The framing, application, and opinions of privacy and social inclusion is revealed by careful analysis of and observations from both interview transcripts and speech transcripts from the World Bank’s legal conference.

**Step IV: Identifying Meanings In Conflict Between Interpretive Communities**

The fourth step of the interpretive policy analysis requires comparison of both similarities and differences between the policy meanings assigned by each interpretive community (Yanow 2000). This portion of the analysis will focus on World Bank application of these principles, the general atmosphere surrounding the cohesion of World Bank digital development projects, and the outlook for ICT4D governance going forward. The conflicting meanings between communities are discussed as either differences in priorities for each group or actor, or differences in “epistemological and ethical” background (Yanow, p. 21). From this, the implications for future World Bank policies and action can be drawn. Moreover, conflicting meanings between groups or even sources of information can signal an encouraging policy truth (Yanow, p. 8). Recognition of tensions translates into a belief in the implementers' deeds, not just what policy states (Yanow, p. 8). This can reveal the “truth of policy” and thus the intent of the regulating organization; in this case, the World Bank communities’ deeds may reveal a different truth than the World Bank policies convey.

**C. Interview Methods**

To be selected to interview, the participant had to be an employee of the World Bank for at least two years, currently working in the digital development practice for ICT4D projects. The interview subjects were all experienced in the field of ICT4D prior to and including their time at the World Bank.
Initial interviews were arranged by internal email requests to individuals who were listed as having managerial roles for ICT4D initiatives and others who had written for the World Bank Digital Development Blog on a topic that evaluated ICT4D project impact. Having worked for over a year as a World Bank intern in the Technology Strategy and Annual Investment Planning team, I identified initial interview subjects based on their relevance as decision-makers for ICT4D development within the World Bank. The snowball networking approach was then used to reach out to additional interview subjects with relevant perspectives from the same interpretive communities, as per the recommendation of Yanow (2000; Secor & Jones, 2010). The interview format was semi-structured and divided into three parts, with interviewees prompted by questions from each of the three aforementioned thematic sections (Yanow, 2000; Kallio et al., 2016).
**Section IV: Analysis**

This section focuses on the meanings that privacy and social inclusion have for World Bank interpretive communities, as captured by shared discourse in the three groups of stakeholders: managers (IC1), designers (IC2), and implementers (IC3). The differences in meaning between the communities, and the differences between community meanings and World Bank policy, indicate inconsistent application of World Bank user protection policies. Yanow (2000, p. 8) argues that these tensions redefine World Bank policies, given that the “acts of legislators and decision-makers” (in this case, World Bank actors) are as “central in communicating policy meanings” as the legislation (the World Bank policy framework) itself. That is, the World Bank policy is not representative of Bank standards if the actors responsible for implementing it do not uniformly interpret it. The analysis, comparing the community discourses captured in interview and speech transcripts, is divided into three thematic sections: (i) framing of privacy and social inclusion in ICT4D; (ii) application of World Bank ICT4D policy framework; and (iii) future policies for ICT4D.

**Thematic Concept #1: Framing Privacy and Social Inclusion**

This theme of community discourse aimed to capture how each community framed the issues of privacy and social inclusion for technology; applied these policy issues in practice; and balanced the two policy issues with other values or factors in ICT4D projects. To understand how each community conceptualized privacy and social inclusion, the responses to the following four questions were analyzed for each community:

1) What are the risks, if any, to users as a result of ICT4D projects?

2) Are risks of privacy or social inclusion considered in ICT4D impact?
3) If so, how do you [the subject] think of these risks? How do you balance risks with other priorities for an ICT4D project?

4) What common measures do you take to maintain privacy and social inclusion when making recommendations to partner organizations and governments?

**Defining Privacy and Inclusion**

The communities generally defined privacy and social inclusion consistently. A majority of members from each interpretive community (75 percent of total respondents) described privacy as an individual’s right to “secure” personal data offered while using technology, acknowledging that this information was often “sensitive” and “identifying” for an individual. Ninety-seven percent of members from all communities concluded that privacy was an important standard to uphold. In discussing the risks of privacy, members from each interpretive community brought up the necessity of communicating rights and security standards to beneficiaries, alluding to the collection of “informed consent” to guarantee user protection when using a tool.\(^{11}\) Furthermore, thirty percent of interview subjects discussed the risks posed by data leaks and breaches when implementers did not ensure secure data infrastructure. The stakeholders also weighed the risks of data sharing to third parties, noting that data sharing was only permissible in cases wherein beneficiaries and regulators had approved of sharing beforehand. However, interview subjects also acknowledged a conundrum of the digital divide that the beneficiaries may not be able to consent to sharing if they do not fully understand their data rights.

---

\(^{11}\) Refer to “Consent/User Communication” code in Table 5 of the Appendix.
Although managers, designers, and implementers also agreed on the definition of social inclusion, few members of any of the communities referred to components of the World Bank’s definition of social inclusion. Whether this was a result of lacking policy communication from the Bank or disagreements on the definition itself varied from subject to subject. To define social inclusion, the communities used concepts like “equality,” “nondiscrimination,” and “digital divides.” However, members of every community expressed different factors of social inclusion and exclusion. First, about twenty percent of total subjects, from all three communities, discussed the importance of “empowerment” as a factor of social inclusion.\textsuperscript{12} Secondly, forty percent of subjects described access to technology as the main factor of whether a project was socially inclusive for individuals and communities, referring to the older definition of digital divides based on technology access. Of this forty percent (twelve subjects), six subjects were from IC2, the designers, indicating that designers often operationalized the older definition of digital divides to consider user protection. Thirdly, the remaining forty percent of subjects identified demographic distinctions like “race,” “gender,” “education level,” “class,” “proximity to a city,” and “culture norms” as characteristics that posed barriers to social inclusion. These twelve subjects asserted that technology could be an equalizer only if it could preemptively account for these inherent barriers in a community, acknowledging Keniston & Kumar’s view that digital divides (2004) are created by the methods of ICT distribution. The subjects who were able to more articulately and comfortably define factors of the policy issues related that their project teams were encouraged to think about user protection standards, whether at the request of clients or managers. Subjects from the Agriculture practice discussed how their team would often

\textsuperscript{12} Empowerment is a central component of the definition of “social inclusion” posed by the World Bank (World Bank, 2019).
be sent articles about user protection in digital agriculture, weighed factors of user impact when discussing projects, and assigned importance to these issues because of leadership examples. On the other hand, the subjects who could not as clearly discuss the policy issues often discussed privacy and social inclusion as removed from their work; the main priority was completion of a project, and user protection issues were only thought of as policy requirements and externalities of project outcomes. These subjects did not describe a similar “culture” of discussing these topics with team members and directly in relation to their projects. The communities generally held similar definitions for privacy and social inclusion. However, their understanding of how these policy issues were applied in practice was distinguished by their attention to either technology access or demographics as important factors.

**Shared Values of Technology Provision and Innovation**

While interpretive communities disagreed on their framing of privacy and social inclusion, they did share the values of ‘provision’ and ‘innovation’ as essential to “maximizing development outcomes” for technology project goals and priorities. All interview subjects discussed balanced provision and innovation as key values for in technology projects when speaking about their framings of privacy and social inclusion.

Subjects expressed technology ‘provision’ by referring to the use of data and investment to “expand” or “increase” the reach of projects to a maximum number of beneficiaries. These stakeholders prioritized and ensured their goal of ‘provision’ in projects through increased investment in “expansion of technology infrastructure” and “widespread access” to technology. Subjects described that they measured the success of provision by how quickly a project could increase technology access to its beneficiaries, or its efficiency. Furthermore, subjects described
‘innovation’ as the “new” methods that were developed, following initial project implementation, to increase the efficiency or expansion of a project. The subjects reported that the potential for innovation in a project was increased through collected user data from a project and monitoring of a project’s initial implementation. Innovation was an objective in projects, measured as an “increase in the efficiency” and “spread of technology reach,” i.e. provision, to beneficiaries. The shared values of ‘provision’ and ‘innovation’ were tied closely together in community discourse and measured by the number of beneficiaries with technology access.

Framing Privacy and Social Inclusion

Each community varied in their framings of privacy and social inclusion, because each community weighed privacy and social inclusion differently against their shared values of technology innovation and provision.

World Bank managers (IC1) maintained that privacy and inclusion were important to prioritize at each stage of the project, along with technology provision and innovation. In the design and initial investment stage of a project, managers agreed that user protection standards were of equal priority as provision and innovation, given that all four principles are given weight in World Bank project approval standards. IC1 communicated that, in the implementation phase, the four principles are all especially important to maintain given the direct impact to beneficiaries through local actors. All of the managers brought up all four principles when framing relevant user protection standards and policy issues, and eighty percent of managers asserted that the interaction of all four principles ensure the sustainability of a project. Moreover, several managers discussed the importance of maintaining privacy and social inclusion in mind
at all stages of a project, not just during implementation. For example, one manager from the digital identity sector described her method of thinking for Digital ID projects:

“It’s not just laws and regulations, but how can you reinforce some of these principles [social inclusion and privacy] through the technical designs to make sure the project safely reaches as many people as possible?”

As indicated by the manager’s statement, provision should be redefined not as how many people have access to technology, but rather the number of people who have access in a way that is safe and respectful of their rights. Ninety percent of IC1 expressed that the risks raised by inadequate privacy and social inclusion protection posed equal risks to a project’s ability to serve maximum beneficiaries and limited the potential for project innovation in the future. Ultimately, one principle without the others fails the goal of projects, so balancing between them was essential. Evidently, World Bank managers did not weigh the risks of privacy and social inclusion against values of provision and innovation; rather, they understood them to interact with each other for the same goal.

On the other hand, World Bank designers (IC2) balanced values as a zero-sum game of privacy and social inclusion versus provision and innovation. Ninety percent of designers raised questions about the importance of considering privacy and social inclusion when, to them, technology provision and innovation were of utmost priority. According to these designers, they associated the two policy issues with new regulatory requirements; in their view, technology provision and innovation have always been the central priorities, and these additional requirements are only secondary to the main goal of provision. In many ways, the designers found it challenging to embed privacy and social inclusion “productively” into their projects.13

---

13 It is interesting to note that while IC1 mentioned the importance of embedding user protection principles into a project, IC2 (80 percent) found it challenging and infeasible to do so in practice. All of the designers who brought
For the most part, members of IC2 (90 percent) could clearly discuss the components of project design that contributed to their goals of provision and inclusion. They all used symbolic language that fell under the codes for “Expansion of technology services and infrastructure” and “Innovation for technology expansion,” while referring to infrastructure-building, widespread technology access, and improved delivery of services.\(^{14}\) However, while designers found it a challenge to prioritize privacy and social inclusion, they did refer indirectly to these concepts through the symbolic language listed for the codes of privacy and social inclusion.\(^{15}\) For instance, one designer from the energy and technology sector described his view of technology provision as follows:

“Provision is something we think about in all of our projects… that’s really the unifying factor for every project I have worked on. And to think about provision, you have to think about a series of other, smaller factors: ensuring there are no data leaks so beneficiaries trust the tech, making sure tech is affordable so even the poorest can have access to it, you know, girls may not be allowed to go to school so how can you ensure it’s accessible to them from a literacy standpoint… provision takes a lot to think about. And sometimes it is hard to figure out how to think more about user protection when so many risks already add barriers to ensuring technology expansion.”

This designer’s perspective showed a contradiction: he brought up concepts of privacy and social inclusion without explicitly naming them. As the designer described, provision required project designers to consider “data leaks,” “affordability,” “the poorest,” “girls,” and “literacy as risks to balance; each of these keywords are listed as symbolic language under privacy and social inclusion in the coding scheme. However, the designer concluded his thought by expressing the challenge of considering user protection along with technology provision. The interview subject

\(^{14}\) Refer to Table 4 in the Appendix to view the mentioned codes.

\(^{15}\) Refer to Tables 5 and 6 in the Appendix to view privacy and social inclusion codebooks.
did not relate the issues of privacy and social inclusion with provision directly, but rather indirectly mentioned the coinciding nature of the values. As a result, the captured discourse of IC2 demonstrated that community members framed social inclusion and privacy directly against provision and innovation, implying that prioritizing the values was, to some degree, mutually exclusive.

World Bank implementers (IC3) believed privacy and social inclusion to be just as important as shared values of provision and innovation. All subjects in the implementers category mentioned that their client interactions and “experiences on the ground”\textsuperscript{16} were influential for the way they framed privacy and social inclusion within the context of provision and innovation. For example, one implementer elaborated upon his framing of these user protection principles through his experience working on broadband infrastructure:

“...Then we have a question of citizen engagement. Originally, we needed to build digital platforms. What we were doing on my side of things was foundation building, which was not so much going to beneficiaries. We were focusing on user connectivity to the internet. Now, however, we are trying to have a more comprehensive approach, because we have to ensure inclusivity, data literacy, target areas for the poor, go to the remote areas... to guarantee provision in the future.”

As this example illustrates, various aspects of ensuring privacy and social inclusion in projects were completed with provision in mind. The description of his experience includes multiple keywords tagged under the code of “Demographics” in the social inclusion coding scheme. The implementer later described the “innovative” reforms made to their approach so as to more proactively include these user protection measures. Similarly, speaking through examples from

\textsuperscript{16} Oftentimes, the implementers were those currently on or previously sent on “mission,” the World Bank term for being sent to a project site outside of the World Bank Headquarters in Washington, D.C. As a result, many implementers referred to their experiences directly interacting with local clients and external project stakeholders when explaining their views of user protection issues.
their experiences, IC3 interview subjects acknowledged their shared interest in increased technology provision and innovation as a result of their projects. They also regarded principles of privacy and social inclusion with equal importance when discussing risk balancing and priorities in their own projects.

**Privacy & Social Inclusion, Provision & Innovation: Interrelated Concepts**

The captured discourses of each of the three communities revealed that IC1 (managers) and IC3 (implementers) framed privacy, social inclusion, provision, and innovation as interrelated policy issues and shared values. IC2 (designers) explicitly framed the four values as competing, separate concepts, though further analysis of their symbolic language indicated that designers actually may implicitly view the concepts to be more interrelated than they let on. Therefore, a shared theme emerges amongst the World Bank interpretive communities: policy issues of privacy and social inclusion in technology projects are framed within the shared context of provision and innovation.

The variations in their framings are due in part to issues they perceive surrounding impact evaluation and regulation. A majority of interview subjects from each community (67 percent) raised the point that provision and innovation in technology projects are much easier to track, and therefore address, from a stakeholder point of view. The importance of quantifiable impact measurement has historically been a characteristic of World Bank projects, because a numerical return on investment directly demonstrates the value of a loan made. World Bank guidelines and good practices in development highlight the importance of evidence-based interventions for impactful projects. Provision and innovation for expansion of technology projects are much
easier to measure, while the impact of user protection efforts are not as “measurable.” For example, one designer described the following regarding digital agriculture projects:

“We don’t have much evidence for the work we are doing. We know it gives people more access to public services because we can guarantee that we are providing that, but the rest of the impact, we often have to wait to hear.”

The designer’s statement reflects the lack of preemptive knowledge that ICT4D projects operate with, and the sustainability of projects is hard to gauge beyond provision, which can be measured numerically is difficult to gauge. This sentiment was reflected across each community, within which at least one member from each community described the challenge of “measuring the impact” of privacy and social inclusion efforts. On the other hand, one IC3 interview subject raised a different issue, that negative impacts of privacy and social inclusion failures are easily noticeable because of resulting data breaches and digital divides. However, the impact of “good” privacy and social inclusion practices is hard to assess.

The varied framing of these policy issues is represented further in a statement by an economist in the broadband and infrastructure sector:

“We see the purpose of anticipating user protection standards, but this is often seen as a separate requirement because of the policies.”

Beyond ambiguous impact evaluations, members from each community (83 percent) described the lack of clarity created by the World Bank policies. According to these World Bank stakeholders, the World Bank policy regulates principles of privacy and social inclusion with an emphasis on user impact, insinuating a separation of these policy issues from the shared goals of provision and innovation. As a result, each World Bank interpretive community frames privacy and social inclusion differently against and with the values of provision and innovation.
Thematic Concept #2: Application of World Bank Policy ICT4D Policy Framework

This section discusses each World Bank interpretive community’s acknowledgement and evaluation of the World Bank policies governing digital development projects. The analysis in this section focuses on the methods of policy application and degree of policy integration between policy-relevant publics and projects, with the objective of lending insight into the cohesion of World Bank policy standards across ICT4D projects. To understand how interpretive communities perceive and apply the World Bank policies governing digital development, the following five questions were analyzed for each group:

1. What is the World Bank’s institutional position and policy on user protection standards?
2. How does the World Bank framework encourage privacy and social inclusion in your projects? How does the World Bank emphasize user protection standards in general?
3. How do you integrate institutional guidelines in your projects?
4. In your view, how much of a priority is such integration for you compared to other World Bank actors?
5. What user protection measures does the current framework succeed in communicating? What measures does the framework leave unclear?

Knowledge and Perception of World Bank Policies

The three interpretive communities referred to the 2018 World Bank Environmental and Social Framework as the principal regulatory framework governing digital development; however, not all interview subjects pointed to the 2012 ICT Strategy when discussing World Bank policies on ICT4D.
Of the sixty-three percent of stakeholders who brought up the 2012 ICT Strategy, sixteen interview subjects (out of nineteen) referred to the principles-based, rather than regulatory, nature of the policy. The stakeholders discussed the three pillars of the policy as “open-ended” and “a guiding overview,” which they applied to projects only as needed to frame their thinking of digital development considerations. Of these nineteen subjects who referred to the ICT framework, ten subjects (53 percent) were managers (IC1); the remaining nine subjects consisted of seven designers (IC2) and two implementers (IC3). Evidently, IC1 was the only group consistently aware of the ICT Strategy as a policy for digital development, with IC2 close behind. The common theme between managers’ (IC1) and designers’ (IC2) statements regarding these policies was the frequent use of the ICT Strategy in the design phase of a project; this may account for the lack of policy acknowledgement by the implementers (IC3), who are less involved in the design stage of a project. However, this policy did not have the same degree of implementation and acknowledgement as the Bank-wide policy.

Alternately, every interview subject recognized the Environmental and Social Framework (ESF), a Bank-wide policy for projects, as a baseline mandatory policy to ensure continued funding for World Bank digital development projects. The Environmental and Social Framework was applied to all World Bank projects in 2018 in order to improve development outcomes and proactively address the environmental and social risks of projects (World Bank, 2018). Eighty percent of the World Bank actors from each community described the effectiveness of the Environmental and Social Framework as evidenced by a “culture shift” within the World Bank digital development practice. Most stakeholders cited a transition between “two eras” of projects

---

17 Refer to Table 3 in the Appendix for the World Bank ICT Strategy.
resulting from a change in internal processes to better comply with ESF standards. One implementer working in digital infrastructure legislation described the following shift:

“In the old generation of projects, we were doing policy for licensing regimes, taxation, and sector work. Not so much from the user point of view, but more the supply point of view. Now, in the new generation of projects, all the aspects of diversity, protection, basic community rights… this is something we integrate in all of our projects.”

Members from both IC2 and IC3 similarly discussed a shift in project perspectives from a “supply and demand” perspective to a more “user-centric” approach following the implementation of the Environmental and Social Framework. Members from all three interpretive communities could identify standards of the Environmental and Social Framework, specifically the tenth standard that emphasizes the “effective and inclusive engagement with project-affected parties throughout the lifecycle of a project on issues that could potentially affect them” (World Bank, 2018). Interview subjects frequently referred to the bureaucratic push for multi-stakeholder engagement created by the policy, as well as the increased attention to user protection issues.

Effectiveness of World Bank Policy

Despite policy familiarity and the culture shift, members from all three interpretive communities questioned the effectiveness of the 2012 ICT Strategy and the Environmental and Social Framework in practice. All interview subjects recognized that the purpose of World Bank policies was to establish a clear standard for projects, ensuring cohesion and uniformity in policy applications. However, ninety-three percent of subjects questioned the current policies’ success

---

18 The ESF Standards include ten Environmental and Social Standards that discuss in detail the user and environmental protection standards that must be maintained in all World Bank projects. Refer to Table 2 in the Appendix.
in achieving this purpose. The 2012 ICT Strategy Framework was largely excluded from the communities’ policy assessments, given the principles-based nature of the policy. Rather than providing a policy or framework, subjects argued, the ICT Strategy served as an example of factors to consider and goals for World Bank digital development. Therefore, it was not effective in improving cohesion amongst projects. Twenty-five World Bank actors (83 percent) felt that it was largely their choice of how to integrate the regulatory policies into their actions, but this did not preclude them from indicating ESF compliance in documents. The evaluation of projects seemed circular. If project stakeholders indicated on paper that they would uphold the ESF standards, they would receive approval from monitoring parties. When stakeholders received approval, they took it as affirmation that their actions reflected ESF standards. This flaw, largely attributed to the vague description of standards in the ESF, disincentivizes effective, uniform application of World Bank policy.

**Varied Applications of World Bank Policy: Managers**

For managers in IC1, the depth of policy integration depended largely on how much they were interested in embedding policy principles into their projects. Given that the managers would often set the tone and priorities for a project, each manager had significant control over the degree to which World Bank policy was integrated into their ICT4D projects. For instance, a manager in the agriculture practice was adamant about “coding user protection into [his] team,” as per the suggestion of the World Bank policies. The manager referred to the ESF recommendation to maintain “continued discourse” on the issues outlined in the ESF for productive project outcomes. The manager’s framework for ensuring policy compliance, however, was largely of his own crafting. The manager assigned user protection articles and case
studies for his project members to read and discuss, and he made a “serious effort” to discuss the importance of user impact at every phase of a project. The manager spoke about the content of the frameworks, but never relied on them to explain his approach to World Bank policy compliance. Other managers similarly applied their own concrete frameworks to ensure depth of their policy applications, either out of interest (40 percent), at client request (10 percent), or because of industry best practices (50 percent). A manager in the digital identification (ID) practice described how the ID sector in the Bank developed their own framework based on the principles for sustainability that the ESF recommended. She proposed her approach as follows:

“One size certainly does not fit every country case, or project for that matter. Because of this, it is important for me to have a standardized set of best practices that is specifically for ID; we refer a lot to the Principles on Identification for Sustainable Development that we developed a few years ago. That works for us a lot better than just the ESF or ICT strategy would.”

However, other managers did not invest similar diligence into policy integration. For the less engaged managers, the degree of policy application was more superficial. A senior manager in digital identification, for instance, relied on the pillars of “Innovate, Connect, and Transform” to describe their project’s approach to World Bank policies. The manager mentioned that their team “considers” these pillars in their project, but could not identify how they integrate the principles. Other managers demonstrated similar surface-level application of policies despite knowledge of the policies’ requirements. Therefore, because there is no concrete framework in the policy for managers to uniformly apply, each manager applied the World Bank policies

19 The manager referred to the 2017 policy framework developed by the World Bank ID4D practice and endorsed by international partners. This framework has served as a tool for best practices in ID governance, and focuses on user protection (ID for Development, 2017).
20 Refers to the 2012 ICT Strategy central pillars. See Table 3 for more information on this policy.
differently based on their personal preferences and incentives for user protection policy standards.

**Varied Applications of World Bank Policy: Designers**

Designers in IC2 recognized the Bank-wide shift towards user protection policies through ESF, but a strong majority of designers (90 percent) deliberately maintained a “neutral” stance when implementing the framework. The priority competing with policy integration for these designers was client requirements. When discussing policy application, all designers utilized keywords listed under the “Client role” code, highlighting the importance of client engagement and relationship-building during the design phase of a project. One economist in IC2 described the rationale for a neutral stance as follows:

“We stay neutral. We try to push for a level playing field [for beneficiaries] at the district level, but as far as the content [of a project] is concerned, we do not get implicated with the details, because that is quite often very politically intense. We can only support provision, but policies have made this a challenge.”

The designers’ decision to remain neutral towards policy application indicated their view of Environmental and Social Standards as a Bank-imposed “restriction.” While designers recognized that the flexible nature of ESF standards contributed to the policy’s ineffectiveness, the interpretive community acknowledged that the flexibility also allowed for them to interpret and comply with the “bare minimum” of policy requirements to receive funding. With respect to the 2012 ICT Strategy, the open-ended and non-mandatory nature of the ICT pillars permitted designers to apply the three principles to projects when possible. Designers implemented World Bank policies in the design phase with varying levels of commitment, depending on their client relationship, comfort pushing user standards, and the tone of the project set by their managers.
Varied Applications of World Bank Policy: Implementers

Implementers differed from managers and designers on their approaches to World Bank policy. Members of IC3 generally agreed that the World Bank policy was important to apply to project implementation phases, especially compliance with each of the ten Environmental and Social Standards in the ESF. However, implementers discussed that, just as their prioritization of privacy and inclusion fluctuated with time and by project, so did their attention to “quality” policy application.

Two implementers described the ESF policy shift towards the Bank policy as a “cultural trend.” They attributed policy application to the “work culture” differences between those interacting with stakeholders World Bank headquarters in the United States versus those interacting with local stakeholders in client countries. Implementers discussed that their application of World Bank policy depended on the factors raised by local partners, especially given the focus of implementers’ roles on impact evaluation. As one implementer in Ethiopia remarked:

“You can count the number of users who receive access to technology, but you cannot count who is impacted negatively by the way the environment has been altered by technology.”

Implementers concurred that implementation of the World Bank policy, while important, did not increase the numbers of beneficiaries listed in project impact evaluations. Oftentimes, though the importance of user protection was never diminished, implementers struggled to justify diligent policy application in their projects when the focus was always on the delivery of tangible results to the client. For instance, one implementer working on technology literacy projects stated:

“And we have a long term vision, right? We work in the long term, and what we do is plan what is feasible in two years but it has an impact maybe later. And it
is quite often distressful for a client to see what the impact is and we need to recognize that.”

The implementer was alluding to the challenge of implementing World Bank policies because of a potential delay in results to the client, which the implementer weighed over policy integration. When client influence was high, the implementers focused less on policy implementation and more on the delivery of countable, measurable impact to the client, given that project timelines were already so long for digital development projects.

**Impact of Policy Framework on Bank Operations vs. Project Outcomes: A Disconnect**

Despite varied policy application, subjects from IC2 (designers) and IC3 (implementers) discussed the overwhelming impact of World Bank policy implementation in projects. Subjects from these two communities cited a significant increase in bureaucratic hurdles as a result of the Environmental and Social Framework, often expressing frustration that despite an unclear policy framework, much of their effort went towards navigating these new institutional steps. One implementer said the following while discussing ESF compliance for ICT4D projects:

“It is becoming overwhelming; we are more and more interacting with our colleagues from the safeguard perspective. It is a lot of burden, it’s a burden, it’s a huge burden for the teams. Much for the better, but it’s not clear how.”

The implementer’s sentiments were echoed by members from both IC2 and IC3. The burden of policy compliance was felt, but its results for beneficiaries and clients were not evidently clear.

Each interpretive community had different methods of applying the World Bank policy framework, and all three interpretive communities (83 percent) agreed that the policy standards were “unclear” and did not communicate how to integrate user protection alongside shared goals and objectives. Almost all community members (97 percent) referred to the lasting impact of a project as the main objective, using keywords from the “Sustainability of investment / project”
However, each community interpreted and applied the World Bank policy framework in different ways to ensure the sustainability of their projects. A majority of community stakeholders (93 percent) anticipated that other communities and projects likely applied the policy framework differently, attributing incohesive outcomes to unclear standards for World Bank ICT projects.

Therefore, analysis of policy interpretations reveals that each World Bank interpretive community applied the World Bank policies differently and recognized that the current policy framework was ill-suited to maintain cohesion in ICT and promote project sustainability. Each interpretive community agreed that the policy framework succeeding in mentioning the key considerations for project stakeholders when thinking about user protection policy issues like “privacy” and “social inclusion.” However, all three interpretive communities acknowledged that the policy framework was inadequate and challenging to implement uniformly in Bank projects. They cite lack of specificity in policy regulation as a significant barrier to establishing a unified World Bank standard.

**Thematic Concept #3: Future Policies for ICT4D**

This section captures the World Bank actors’ discourse to understand how each interpretive community identifies gaps in current ICT4D governance and frames the requirements for both World Bank policies and international policy frameworks in the future. The analysis in this section reveals the importance of reflecting shared discourses between communities in policy frameworks, as well as the challenge of pinpointing responsibility for technology regulation going forward. Interpretive communities saw the advantages of cohesion

---

21 Refer to the codebook in Table 4 of the Appendix.
in future digital development outcomes, weighing World Bank priorities against country priorities for ICT4D governance in the future. To understand how the interpretive communities conceive of future World Bank and international policy frameworks for digital development, responses to the following four questions were analyzed in depth:

1. Should the World Bank refine and set a clearer framework to govern user protection in ICT4D projects?

2. What do you believe are the essential policy factors for effective ICT governance in the future, both within and outside of the World Bank scope?

3. Is a global consensus on user protection standards possible or necessary for ICT?

4. What challenges could inhibit the establishment of uniform user protection standards?

**Sustainability in the Future World Bank Policy Framework**

Members from all three interpretive communities (90 percent) agreed that the shared value of “sustainability” in a project was a crucial factor to include in World Bank policy frameworks going forward. Members from IC1 and IC3 discussed the importance of sustainability to see through “permanent” and “positive” impact to beneficiaries and autonomy of the client following a loan. Members from IC2 framed sustainability of the investment as a priority to guarantee “outcomes” for World Bank lender success rates, which they determined was achieved through sustainable project impact to beneficiaries. At present, the communities admitted, the policy frameworks mentioned but did not effectively communicate the implications of prioritizing user protection standards in projects. Therefore, drawing from their framings of the policy issues, the communities agreed that privacy and social inclusion are important to
frame in future policy frameworks as two factors that significantly contribute to project sustainability.

Ninety-seven percent of interview subjects recommended a revised ICT World Bank policy mandating the application of user protection to digital development. After seeing the impact of the Environmental and Social Framework, these stakeholders advocated for a similar mandatory, user-centric policy framework to unify digital development projects and create a similar culture shift for ICT4D with measurable outcomes. All three interpretive communities agreed that a more specific ICT application of the Environmental and Social Framework was necessary given that the regulation of ICT already lacks clear best practices and robust legislation in client countries. Members from each community (97 percent) concurred that the World Bank could play a role in setting institutional best practices for ICT4D governance through a revised policy. Furthermore, fifty percent of interview subjects (primarily from IC2 and IC3) agreed that sector-specific and project stage-specific policies may bolster the policy framework by making user protection principles more clearly applicable.

The Institution’s Role in the Future Policy Framework

Each community discussed the role of the World Bank as a lender in digital development projects with client governments. Members from each of the three communities (83 percent) mentioned that future Bank policy frameworks should continue to emphasize the World Bank’s role to ensure that technology is “accessible” on a wide scale. Local stakeholders and governments often had different and more specific priorities, so it is important to reinforce the World Bank’s role through project design and implementation with country stakeholders. When discussing the importance of “accessible” technology through ICT4D projects, stakeholders
repeatedly referred to symbolic language listed under the codes of “Affordability,” “Expansion of technology services and infrastructure,” and “Innovation for technology expansion.” Thus, the communities agreed, values of affordability, provision, and innovation were important to include in World Bank policy frameworks going forward. These values were also mentioned as factors for sustainability in ICT4D projects.

**Cohesion, Diverging Priorities, and Future World Bank Policy**

Despite the inclusion of shared values and factors for sustainability in future policy frameworks, eighty-seven percent of interview subjects recognized that uniform application of the policies would be a challenge. They identified that the challenge was not just attributable to inadequacies in the policy framework; it was also the sheer size of the institution and incredibly specialized nature of roles at the World Bank. One interview subject described cohesion being a challenge at the World Bank, because “each person, each project is a cog in a machine” that serves every sector area of international development. As a result, each interpretive community had differing perspectives on future approaches to a World Bank policy framework despite their shared goal of sustainability. For instance, forty percent of designers (IC2) maintained that a streamlined approach to policy framework compliance would reduce the bureaucracy added to their roles. One designer, an economist, asserted:

“The main objective of an investment is to fund an investment. You provide procurement and make sure it is done in the best, transparent, neutral way. The legal and user protection function should be separate.”

The designer acknowledged that there are World Bank actors with specialized roles to handle compliance, and rather than advocating for policy integration by all actors, he recommended that it ought to be handled separately by stakeholders occupying this role. Other designers advocated
for sector-specific policy frameworks to ensure that they had practical guidelines to follow for their projects.

On the other hand, managers (IC1) described the importance of both vertical and horizontal policy integration, constantly referring to their priority of ensuring user protection standards in stages beyond implementation. Two managers referred to the “privacy by design principle” when discussing future approaches to World Bank privacy regulation, asserting that privacy must be embedded, rather than just monitored and regulated, in projects. They also described the importance of each stakeholder keeping a “list of user protection priorities” that they shared with other stakeholders within the same project or ICT4D in general. The managers concluded that future policy frameworks ought to communicate shared priorities and be applicable on an individual level for every stakeholder in an ICT4D project.

The implementers (IC3) recommended a revised World Bank policy framework that emphasized the relationship between the institution and other external stakeholders, including the client. Acknowledging that their role was primarily focused on mediation with local actors, seventy percent of implementers supported a future policy framework that recognized the sensitivity of client relationships and power balance between the World Bank and other actors. As one implementer working in Ethiopia stated:

“In Africa, you come to invest $100 or $200 million in the country, and it feels like you certainly have more power of negotiation than anybody on Earth. That may not be the case with other countries or projects, but we need a way to reconcile that through policy guidelines.”

Beyond just recognizing the power balance, implementers raised the issue of maintaining World Bank priorities with local stakeholders. For instance, one implementer working in broadband told an anecdote to illustrate this point:
“In the Congo, we laid down fiber optics cables for 2000 kilometers of internet infrastructure. So we recruited the vendors, laid down the fibers, but then the most important part of it is not the infrastructure itself but the side that, and this is where we argue with local colleagues, is that once the construction is done, we need to make sure the infrastructure will be managed in a way that the investment will be sustainable. The challenge was, and always is, negotiating with local stakeholders to encourage liberalization in the telecommunications sector. This was the only thing that ensured equal access for beneficiaries.”

The implementer went on to describe that user protection standards were essential to include in a revised policy framework with even more emphasis, but implementers also needed more of a path to integrating these policy issues in the face of client disagreement. The implementers’ perspectives compared with those of the managers and designers showed that each community shared similar values but sought policy solutions for the challenges they navigated in each stage of their project roles. However, there was no clear majority consensus amongst the interview subjects about whether the more role-specific framework applications would be best addressed through a Bank-wide ICT policy or more specific role-based frameworks.

**Other World Bank Policy Factors for Future Consideration**

Each of the communities brought up additional factors to consider when developing a revised World Bank policy framework for ICT governance. IC2 (designers) mentioned issues of feasibility and cost when integrating user protection standards. One designer brought up these factors when considering how the Bank interacts with clients to establish project standards:

“Most countries are generally interested in user protection, and then they realize how much time and money it will take. We have to remind them that it’s important for sustainability.”

This designer raises an important perspective considering the impact that user protection standards have on not only internal stakeholders, but also clients as well. Considering the factors
that clients prioritize is essential for a policy framework to be applicable across the entirety of World Bank functions. Designers echoed this point, because they often negotiated with clients in the initial design and decision phases of ICT projects. The Environmental and Social Framework, specifically Environmental and Social Standard 1 (ESS1), shifted responsibility of user protection to clients; however, designers acknowledged, the specific responsibilities should be outlined for ICT projects.\textsuperscript{22}

IC1 (managers) discussed the importance of preemptive legislation, rather than regulations correcting for unintended impact after the fact. Few managers (40 percent) nodded to the central goal of the Environmental and Social Framework when discussing this, because the constantly changing nature of technology and long timelines of World Bank projects require proactive attention to user impact.\textsuperscript{23} One manager described the issue of timelines as applied to governance:

“In the digital sector, preparing a project one day and seeing it two years later, you are implementing the project after the landscape has changed dramatically.”

IC3 (implementers) brought up similar concerns for policy frameworks. As per the implementers (80 percent), the factor of constantly-changing technology requires constant standards to maintain user protection despite a changing landscape. One implementer in digital education remarked:

“Even if a technology can last, the way we do it today is very different than what we did five years ago.”

\textsuperscript{22} ESS1 requires Borrowers to conduct environmental and social assessments to help ensure that projects are “environmentally sound and sustainable” (World Bank, 2018). Refer to Table 2 in the Appendix.

\textsuperscript{23} The Environmental and Social Framework’s central goal is “to avoid and mitigate adverse impacts to people and the environment.” Refer to Table 2 in the Appendix.
This implementer also alluded to the changing view of sustainability in a project; just because an investment was initially determined to be sustainable does not guarantee that updated technology would not change project plans throughout the design and implementation stages. Both interpretive communities (IC1 and IC3) agreed that a challenge for policy frameworks is reconciling the fast-changing pace of technology.

*Necessity of International User Protection Standards*

Beyond World Bank policies, all interview subjects raised the importance and necessity of user protection regulations in technology on an international scale. Every stakeholder mentioned either the necessity of clear international standards or legislation governing technology use in every country. The opinions on this were not different between interpretive communities, and each stakeholder acknowledged different reasons for and approaches to general ICT governance in the future. One designer from the digital identity practice discussed the importance of user protection legislation when no ID alternatives were available:

“Biometrics has become the default, partly because in most of the client countries, you don’t have other authoritative sources of identification, like to be able to reliably vouch for this person is who they say they are. They [country governments] have to ensure accountability for these users who have no other options.”

As information and communications technology increasingly becomes the infrastructure for basic and essential services, it must be more carefully regulated to ensure user protection. Three stakeholders who echoed this sentiment raised the issue that, in the past, digital use was often an “opt-in” choice for users who had autonomous control over their interaction with technology. However, the replacement of traditional models with digital infrastructure eliminates the implicit “opt-in” governance of technology in the past. Ensuring user protection standards in these
situations often means addressing potential risks of privacy and data misuse. From a social inclusion standpoint, the stakeholders mentioned that “access to digital-only services” meant that digital literacy and affordability must be established for all potential beneficiaries.

Other stakeholders addressed the importance of technology regulation in each country. For instance, one implementer in the cybersecurity practice stated:

“ICT, especially cybersecurity, privacy and social inclusion measures should come from a country organically. International guidelines may have influence on countries, but domestic legislation is the only way to ensure accountability in user protection.”

This implementer clarified that international standards for user protection in cybersecurity would not “eliminate” the need for countrywide standards; rather, it would encourage it. A digital ID stakeholder shared the sentiment by likening international policy frameworks to World Bank principles. Just as the Environmental and Social Framework prompted their identity practice to develop the Principles on Identification, so would international user protection standards give rise to national legislation. While the World Bank stakeholders framed and justified international standards for policy differently, they all agreed that it was critical to move towards defining international user protection standards as information and communications technology becomes an increasingly present part of life.

**Responsibility of Setting International Standards**

A point of disagreement between members of each community was the onus of setting international user protection standards. The question of responsibility was raised by every interview subject, but the difference in their perspectives was less contentious and more speculative. Some interview subjects (40 percent, consisting of members from all ICs) mentioned that technology legislation required concerted, broad governance led by global technology
stakeholders, including private companies, governments, academic experts, and international organizations. The purpose of technology legislation being drafted by technology experts, they argued, was to preemptively regulate and protect users as the field of technology is altered by various stakeholders in the future. On the other hand, some interview subjects (37 percent, consisting primarily of members from IC2 and IC3) suggested instead that user protection legislation be spearheaded by the sectors impacted by technology, such as technology for identity, broadband use, education, literacy, and cybersecurity. Given the broad range of not only technology applications but also user impact, these stakeholders discussed the value of sector-led user protection standards. Overall, however, every interview subject acknowledged the importance of a variety of policies to govern user protection in ICT4D. Policies are needed to govern on an international and domestic scale just as policies are needed for specific sectors and ICT in general. One manager recognized the importance of a holistic approach to technology governance by describing the approach taken by her digital development sector at the World Bank:

“We build this sort of ecosystem, and the reason why it’s worked is because of this, because our approach cuts across so many different development angles.”

The manager suggests that technology ought to be viewed as an ecosystem, not just a tool for development or change; this is the key to success in technology governance. Her sentiment was shared by eleven other stakeholders from all three communities, who all mentioned the importance of multi-stakeholder governance of ICT4D. Therefore, the communities’ discourse emphasized the importance of a policy framework, rather than a singular policy, for effective ICT governance in the future.
Therefore, the interpretive communities’ suggestions for both World Bank and international governance of user protection in ICT reveal two major takeaways. Their different perspectives on policy improvements show the room for and advantages of flexibility in user protection policy frameworks, just as there is flexibility in the definitions of privacy and social inclusion.24 However, there is consensus between the communities that World Bank policies should be framed within the context of sustainability to ensure clearer, more uniform policy application in the future.

---

24 Refer to Section III: Methods, subsection B: Research Design, for definitions of privacy and social inclusion.
Section V: Conclusion

Key Findings

The captured discourse and analysis between different World Bank interpretive communities revealed three key findings about current and future practices for user protection standards in ICT4D.

First, analysis of community discourse revealed that managers (IC1), designers (IC2), and implementers (IC3) all frame and interpret the policy issues of ‘privacy’ and ‘social inclusion’ differently, but the communities all share the common objectives of ‘provision’ and ‘innovation’ in technology projects. The differences in their framing rose from how they related and compared privacy and social inclusion to the issues of provision and innovation. Managers framed the policy issues as essential priorities to implement in each stage of a project, because privacy and social inclusion “by design” contributed to provision and innovation in a project. Designers framed user protection standards as separate policy requirements competing against goals of provision and innovation, though symbolic language indicated that designers view the concepts as more interrelated than they let on. Implementers viewed privacy, social inclusion, provision, and innovation as equally important and acknowledged the interrelated nature of the issues in practice. Therefore, all three communities framed ‘privacy’ and ‘social inclusion’ within the context of shared values of ‘innovation’ and ‘provision.’

Secondly, the interpretive communities agreed that the current framing of the World Bank policy on ICT was unclear and challenging to uniformly apply. Therefore, it was up to Bank actors to balance the two user protection policy issues with provision and innovation. A lack of clear accountability from the Bank permitted varied applications of the policy framework.
Each community recognized that the current policy framework did protect principles of ‘social inclusion’ and ‘privacy’ for potentially-impacted parties of Bank projects. However, stakeholders from each of the three communities identified that the current framework did not frame user protection issues within the context of shared Bank priorities, especially project sustainability. Furthermore, the effectiveness of the Bank-wide Environmental and Social Framework was generally recognized as the primary policy, but each community raised concerns of implementing user protection standards without principles specific to digital development projects. Furthermore, some stakeholders advocated for digital development sectors within the World Bank to develop their own sector-specific interpretation of ESF principles to supplement the current Bank policy framework.

Therefore, the three interpretive communities agreed that future World Bank policies that frame inclusion and privacy within the context of provision and innovation would make policy guidelines clearer and easier to implement. Current perceptions of social inclusion and privacy by Bank actors often vary based on the way they perceive Bank requirements for user protection and provision to be separate. However, stakeholders discussed that both user protection principles and technology provision and innovation contribute to the sustainability of a project, which is ultimately the shared goal of all ICT4D projects. With a revised World Bank policy framework, social inclusion and privacy can become shared goals for Bank stakeholders who want to see sustainable outcomes for their projects.

The World Bank actors’ perceptions of future international standards lends further insight into a future approach for developing the Bank-wide policy framework for ICT4D governance. Their recommendations of multi-stakeholder approaches to overarching policies,
supplemented by sector-specific policies, could reduce the issue of unclear user protection standards in legislation. The Environmental and Social Framework serves as the Bank-wide approach to a policy framework that could be further developed to establish robust ICT standards to govern user protection policies of privacy and social inclusion. On an international scale, user protection standards will only be of increasing importance in the future, and stakeholders are responsible for developing regulations from international, country, and industry-specific levels.

**Concluding Remarks**

I researched “policy” and “social inclusion” in World Bank technology projects to propose a more comprehensive understanding of the unifying attitudes and interpretations of World Bank policies in digital development. Given current global concerns about digital divides for users, along with the push by both the public and private sectors to increase technology access, the issue of technology regulation, especially with regard to user protection, is a largely underdeveloped subject area. While existing literature does contain many ethnographies detailing the impact of ICT4D felt by users, I was curious about the role and influence of project stakeholders responsible for ICT4D deployment. The World Bank has long been regarded as a leading international development institution, and its reports on user protection and effective governance in ICT4D demonstrate a deliberate commitment towards user protection regulations. Therefore, I chose the World Bank as a case study to examine how internal ICT4D project stakeholders interpret and apply user protection standards.

I analyzed internal World Bank stakeholder perspectives by employing an interpretive policy approach focused on the policy issues of privacy and social inclusion. The interpretive communities I interviewed were categorized based on their roles in World Bank digital
development projects: managers, designers, and implementers. Beyond understanding the communities’ framings of privacy and social inclusion in ICT4D, I sought to capture the values and priorities that World Bank stakeholders considered when interpreting governance of digital development projects. I interviewed thirty World Bank stakeholders and attended three days of talks to understand how digital development stakeholders framed user protection standards and applied World Bank policies to their projects and perceptions of ICT4D.

In my analysis, I found that managers, designers, and implementers all varied in their framings of privacy and social inclusion; however, they all framed the two policy issues within the context of provision and innovation. Provision and innovation thus emerged as two additional values that all World Bank stakeholders prioritized as objectives for ICT4D projects. However, while stakeholders framed user protection standards within the context of provision and innovation, the World Bank policy framework did not do the same. Therefore, each community individually balanced priorities and applied World Bank policies to their projects.

The World Bank consistently updates its regulations and policies, especially those governing rapidly-changing fields like ICT4D. When discussing the future of World Bank policy frameworks, the communities agreed that an ICT strategy that framed privacy and social inclusion within a context of shared stakeholder goals would make digital development outcomes more consistent across the World Bank. However, the stakeholders maintained that the World Bank-wide policy, specifically the Environmental and Social Framework, was still necessary for guidance on user protection in projects. The stakeholders advocated for a variety of sector-specific and role-specific policies to supplement the Bank-wide policy framework and ensure simpler, clearer policy interpretations going forward.
Therefore, this thesis concludes that, for more cohesive and feasible application of World Bank user protection standards, a revised World Bank policy framework should be developed to frame user protection within the context of innovation and provision. This refined approach would aid the World Bank in shifting away from its traditionally utilitarian viewpoint of development towards an approach that does not value technology itself, but more so the capacity of technology to impact people’s capabilities (Sen, 2001). The shared goals of innovation, provision, privacy, and social inclusion as steps to project sustainability will better empower World Bank stakeholders to advocate for user rights and positive outcomes in digital development projects going forward. Furthermore, the World Bank case study can be utilized as a model for understanding the various stakeholder perspectives implicated in the design and implementation of a technology project. Considering stakeholder influence on project outcomes is important for effective regulation measures adopted by both countries and organizations seeking to ensure positive outcomes through technology for all users. By ensuring that user protection standards are adequately prioritized in ICT projects, technology can further be leveraged as a tool for international development and global equality in the future.
## Table 1: Interview questions for World Bank interpretive communities.

<table>
<thead>
<tr>
<th>Thematic Concepts</th>
<th>Questions</th>
</tr>
</thead>
</table>
| 1. Framing of “privacy” and “social inclusion” in ICT  | 1. What are the risks, if any, to users as a result of ICT4D projects?  
2. Are risks of privacy or social inclusion considered in ICT4D impact?  
3. If so, how do you think of these risks? How do you balance risks with other priorities for an ICT4D project?  
4. What common measures do you take to maintain privacy and social inclusion when making recommendations to partner organizations and governments? |
| 2. Application of World Bank ICT4D policy framework     | 1. What is the World Bank’s institutional position and policy on user protection standards?  
2. How does the World Bank framework encourage privacy and social inclusion in your projects? How does the World Bank emphasize user protection standards in general?  
3. How do you integrate institutional guidelines in your projects?  
4. In your view, how much of a priority is such integration for you compared to other World Bank actors?  
5. What user protection measures does the current framework succeed in communicating? What measures does the framework leave unclear? |
| 3. Future policies for ICT4D                            | 1. Should the World Bank refine and set a clearer framework to govern user protection in ICT4D projects?  
2. What do you believe are the essential policy factors for effective ICT governance in the future, both within and outside of the World Bank scope?  
3. Is a global consensus on user protection standards possible or necessary for ICT?  
4. What challenges could inhibit the establishment of uniform user protection standards? |
<table>
<thead>
<tr>
<th><strong>ESF Framework Component</strong></th>
<th><strong>Description</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ESF Central Goal</strong></td>
<td>To avoid or mitigate adverse impacts to people and the environment.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 1</strong></td>
<td>Borrowers will conduct environmental and social assessment of projects proposed for Bank financing to help ensure that projects are environmentally and socially sound and sustainable. The environmental and social assessment will be proportionate to the risks and impacts of the project. It will inform the design of the project, and be used to identify mitigation measures and actions and to improve decision making.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 2</strong></td>
<td>To promote the fair treatment, nondiscrimination and equal opportunity of project workers. To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 4</strong></td>
<td>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 5</strong></td>
<td>To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 6</strong></td>
<td>To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 7</strong></td>
<td>To contribute to poverty reduction and sustainable development by ensuring that projects supported by the Bank enhance opportunities for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities to participate in, and benefit from, the development process in ways that do not threaten their unique cultural identities and well-being.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 8</strong></td>
<td>To protect cultural heritage from the adverse impacts of project activities and support its preservation; to promote the equitable sharing of benefits from the use of cultural heritage.</td>
</tr>
<tr>
<td><strong>Environmental and Social Standard 10</strong></td>
<td>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship; to promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them; to ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.</td>
</tr>
<tr>
<td><strong>Scope of application</strong></td>
<td>This Policy and the ESSs apply to all projects supported by the Bank through Investment Project Financing. The Bank will only support projects that are consistent with, and within the boundaries of, the Bank’s Articles of Agreement.</td>
</tr>
</tbody>
</table>

**Table 2:** Highlights of the World Bank policy governing digital development, as written in the Environmental and Social Framework for all World Bank projects (World Bank, 2018).
<table>
<thead>
<tr>
<th>ICT Framework Component</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ICT Overall Objective (Transform pillar)</td>
<td>It will promote ICTs to transform services for greater development impact—strengthening accountability and governance, improving public services, and enabling more inclusive private delivery of services.</td>
</tr>
<tr>
<td>ICT Overall Objective (Innovate pillar)</td>
<td>It will advance ICTs to improve competitiveness and accelerate innovation across the economy and target skills development for ICT-related jobs (a large portion known to be going to women) to improve productivity.</td>
</tr>
<tr>
<td>ICT Overall Objective (Connect pillar)</td>
<td>It will scale up its support for policy reforms and private and public-private ventures to catalyze investment in broadband infrastructure and expand access to broadband services, including for women (Connect pillar).</td>
</tr>
</tbody>
</table>
| Transform components | • Use ICTs to create pressure points for accountability and performance  
• Increase the transparency of government activities and leverage citizen participation  
• Solicit solutions to clearly stated development challenges through crowdsourcing, gamification models, and solver communities  
• Adapt institutional arrangements, legal and regulatory frameworks, and in many cases information technology infrastructure to make these initiatives sustainable. |
| Innovate components | • Support the development of local IT-based services industry and ICT innovation for competitive industries  
• Governments need to integrate ICT opportunities with their national development strategies |
| Connect components | • Increase affordable access, including for women, disabled citizens, disadvantaged communities, and remote and rural areas  
• The need for policy, regulatory, and institutional reforms is continuous. |
| Other principles/goals | • ICTs help women to move freely, exercise control over resources, make decisions in the family, and free themselves from risk of violence  
• ICTs to transform public service delivery across sectors—health, education, social protection, justice, agriculture, water, energy, and transport—both central and local.  
• Countries need sector-specific policies and institutional arrangements to create an enabling environment for using ICTs to improve the reach and efficiency of government services to citizens and businesses.  
• As developing countries transition to a digital world, they must build trust among users of ICT applications—information security and user privacy are essential |

Table 3: Highlights of the World Bank policy governing digital development, as written in the Information and Communications Technology (ICT) Strategy (World Bank, 2012).
<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Values/Goals</td>
<td>Subject refers to values other than privacy or inclusion held by self, team, initiative, or World Bank. Language indicates that other policy issues or goals interact or influence “privacy” and “social inclusion.” Subject indicates varying strengths of priorities as well. Symbolic language includes: “shared,” “central,” “primary,” “secondary,” “tertiary,” “prioritize,” “priority,” “value,” “goal,” “objective,” “context,” “perspective.”</td>
</tr>
<tr>
<td>Affordability</td>
<td>Subject acknowledges values of affordability as a value for increased expansion of technology projects. Subject recognizes market liberalization as one aspect of this goal. Symbolic language includes: “cheap,” “affordable,” “liberalization,” “open market,” “competitive,” “vendors,” “free market.”</td>
</tr>
<tr>
<td>Sustainability of investment/project</td>
<td>Subject recognizes the value of sustainability as a goal for a project or investment. Subject may refer to different reasons for the goal of sustainability. Key words include: “sustainable,” “long-lasting,” “long term,” “enduring,” “viable,” “future,” “investment,” “repay,” “effective.”</td>
</tr>
<tr>
<td>Expansion of technology services and infrastructure</td>
<td>Subject acknowledges and supports the expansion of technology infrastructure development using user data. Symbolic language includes: “advancement,” “widespread,” “provision,” “access,” “increase,” “infrastructure,” “externalities,” “innovate.”</td>
</tr>
<tr>
<td>User protection standards</td>
<td>Subject recognizes a need to consider general user protection in technology projects. Subject uses language that indicates a need for user protection to be a central goal for effective outcomes. Symbolic language includes: “end users,” “impact,” “equal access,” “protect,” “equal,” “privacy,” “rights,” “consent,” “inform,” “communicate,” “human-centric,” “beneficiaries.”</td>
</tr>
<tr>
<td>Innovation for technology expansion</td>
<td>Subject acknowledges innovation in technology from the implementation of projects and utilization of user data. Symbolic language includes: “innovate,” “expand,” “efficient,” “new.”</td>
</tr>
<tr>
<td>Impact measurement of project</td>
<td>Subject refers to the impact of a technology project. Subject could refer to only few of the types of impact, at the most minimal level, user access to technology. Symbolic language includes: “impact,” “effect,” “access,” “betterment,” “outcome,” “future,” “follow-up.”</td>
</tr>
<tr>
<td>Client role</td>
<td>Subject refers to the importance of the client relationship when executing and designing a project. Symbolic language includes: “client,” “government,” “partner,” “relationship,” “engagement,” “neutrality,” “client decision,” “encourage,” “recommend.”</td>
</tr>
<tr>
<td>Politicization of technology</td>
<td>Subject refers to the inherently political nature of technology use and implementation. Symbolic language includes: “politics,” “unequal,” “code,” “unintended impact,” “unanticipated impact.”</td>
</tr>
<tr>
<td>Risk / Alternatives with ICT4D projects</td>
<td>Subject refers to the necessity of a project undertaking given the anticipated impact or risks of a project. Subject differentiates between risk levels or identifies risk issues stated in ESF, including type, location, sensitivity, and scale of the project; the nature and magnitude of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower.</td>
</tr>
</tbody>
</table>

Table 4: General policy-issue codebook for interview and speech transcript analysis (1/3).
<table>
<thead>
<tr>
<th>Privacy Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data characteristics</td>
<td>Subject refers to the different degrees of sensitivity in types of user data, either directly or indirectly recognizing the level of protection demanded by different data types. Symbolic language includes: “identification,” “location,” “personal information.”</td>
</tr>
<tr>
<td>Data collection</td>
<td>Subject differentiates between essential and non-essential data collection for technology use. The subject also either directly or indirectly refers to the reduced obscurity of information lost with the introduction of technology. Symbolic language includes: “required,” “optional,” “unnecessary,” “obscure.”</td>
</tr>
<tr>
<td>Data use</td>
<td>Subject acknowledges the changing levels of privacy for the user based on how user data will be used. Symbolic language includes: “data analysis,” “dataset,” “future use,” “utility,” “user rights,” “third party,” “societal benefit,” “cautious use.”</td>
</tr>
<tr>
<td>Consent / User communication</td>
<td>Subject recognizes the importance of communication and collection of consent to beneficiaries of World Bank projects. Users should understand how their information will be used. Symbolic language includes: “consent,” “inform,” “communicate,” “collect,” “know rights,” “opt-in,” “data sharing.”</td>
</tr>
<tr>
<td>Nonconsensual data sharing</td>
<td>Subject acknowledges the risks of nonconsensual data sharing to third parties. Symbolic language includes: “data share,” “third party,” “disclose,” “data use.”</td>
</tr>
<tr>
<td>Security / Data compromise</td>
<td>Subject refers to the possibility of security compromise through data breaches or data leaks. Subject may acknowledge the importance of secure data storage. Symbolic language includes: “data breach,” “data leak,” “secure storage,” “compromised security,” “weak system,” “security measures.”</td>
</tr>
<tr>
<td>Privacy regulation</td>
<td>Subject refers to either World Bank or country-specific regulations for privacy assurance. World Bank references include mention of either the Environmental and Social Framework or ICT Strategy.</td>
</tr>
<tr>
<td>Human right</td>
<td>Subject recognizes that privacy is a universal, fundamental human right as outlined by a resolution passed in the United Nations Human Rights Council and has been repeated as such in following United Nations documents and development agendas.</td>
</tr>
<tr>
<td>Free, Prior, and Informed Consent (FPIC)</td>
<td>As defined in the ESF ESS8, subject refers to the necessity of collecting free, prior, and informed consent from traditionally underserved communities for whom a project may have adverse impacts on their land, circumstances, or cultural heritage.</td>
</tr>
<tr>
<td>National framework</td>
<td>Subject refers to a country’s framework for privacy and discusses World Bank recommendations for a country’s drafted legislation approved for an investment to be made.</td>
</tr>
</tbody>
</table>

Table 5: Privacy codebook for interview and speech transcript analysis (2/3).
<table>
<thead>
<tr>
<th>Social Inclusion Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data characteristics*</td>
<td>Subject refers to the role of the individual, acknowledging both generalized and personal characteristics of data. Symbolic language includes: “personal,” “independent,” “identifying,” “identity,” “individual,” “non-specific,” “specific,” “general.”</td>
</tr>
<tr>
<td>Social inclusion principles</td>
<td>Subject either directly or indirectly refers to the Bank mission for social inclusion, to empower all people to participate in and benefit from the development process. Symbolic language includes: “equality,” “ nondiscrimination,” “all people,” “access,” “participation,” “benefit.”</td>
</tr>
<tr>
<td>Demographics</td>
<td>Subject refers to groups with demographic characteristics in relation to technology access. Symbolic language includes: “race,” “ethnicity,” “minority,” “vulnerable group,” “age,” “gender,” “sex,” “ability,” “religion,” “location,” “rural,” “suburban,” “urban,” “class,” “socioeconomic status,” “lower/middle/upper class,” “poor,” “poverty line,” “disadvantaged,” “education,” “literacy,” “family,” “community,” “identity,” “systemic.”</td>
</tr>
<tr>
<td>Barriers to technology</td>
<td>Subject refers to barriers to technology or equal opportunity faced by different groups of people, communitiés, or individuals as a result of demographic characteristics listed above. Subject may refer to the need to mitigate these barriers. Symbolic language includes: “prohibit,” “limited,” “adverse,” “discrimination,” “exclusion,” “barrier,” “removal.”</td>
</tr>
<tr>
<td>Services impacted</td>
<td>Subject recognized the impact of technology on the opportunities to a variety of services beyond technology. Symbolic language includes: “equality,” “affordability,” “energy,” “employment,” “financial services,” “beneficiary loans,” “financial assets,” “productive assets,” “job opportunities,” “social interactions,” “consumption.”</td>
</tr>
<tr>
<td>Good International Industry Practice (GIIP)</td>
<td>Subject refers to GIIP as defined in the ESF (World Bank 2018), or the foresight expected from professionals engaged in the same type of undertaking under similar circumstances globally or regionally. The outcome is that a project utilizes the most appropriate technology in a specific circumstance. Symbolic language includes: “alternative,” “feasible,” “project-specific,” “appropriate,” “suitable,” “risks.”</td>
</tr>
<tr>
<td>Services impacted</td>
<td>Subject recognized the impact of technology on the opportunities to a variety of services beyond technology as defined in ESF. Symbolic language includes: “equality,” “affordability,” “energy,” “employment,” “financial services,” “beneficiary loans,” “financial assets,” “productive assets,” “job opportunities,” “social interactions,” “consumption.”</td>
</tr>
<tr>
<td>Adverse impacts to people</td>
<td>Subject refers to the Environmental and Social Standards outlined in ESF (see Table 2) to avoid or mitigate adverse impacts to people and the environment. Symbolic language includes: “adverse impact,” “equality,” “mitigate,” and language in ESS.</td>
</tr>
</tbody>
</table>

Table 6: Social inclusion codebook for interview and speech transcript analysis (3/3).
Bibliography


https://www.cambridge.org/core/journals/international-organization/article/power-in-international-politics/F5F3C74D30A12A5C4CC9B4EFEA152967.

https://doi.org/10.1002/pad.1796.


https://doi.org/10.1257/jep.30.1.53.

Dixon, Pam. “A Failure to ‘Do No Harm’ -- India’s Aadhaar Biometric ID Program and Its Inability to Protect Privacy in Relation to Measures in Europe and the U.S.” *Health and...*


