



Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 02-Mar-2022 | Report No: PIDC33595



BASIC INFORMATION

A. Basic Project Data

Country Ecuador	Project ID P178564	Parent Project ID (if any)	Project Name Strengthening the National Statistical System in Ecuador (P178564)
Region LATIN AMERICA AND CARIBBEAN	Estimated Appraisal Date Apr 21, 2022	Estimated Board Date Jul 29, 2022	Practice Area (Lead) Poverty and Equity
Financing Instrument Investment Project Financing	Borrower(s) Republic of Ecuador	Implementing Agency Instituto Nacional de Estadística y Censos (INEC)	

Proposed Development Objective(s)

The Proposed Project Development Objective is to improve the national statistical capacity of Ecuador in the production and dissemination of timely and high-quality economic and sociodemographic statistics for evidence-based policymaking.

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	85.00
Total Financing	85.00
of which IBRD/IDA	85.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Bank for Reconstruction and Development (IBRD)	85.00
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Environmental and Social Risk Classification
Moderate

Concept Review Decision
Track I-The review did authorize the preparation to



continue

Other Decision (as needed)

B. Introduction and Context

Country Context

1. Ecuador is an upper-middle-income country with a dollarized economy and rich natural endowments, but it is currently struggling under unprecedentedly adverse global and domestic pressures. After sustaining more than a decade of rapid growth, Ecuador has seen a marked slowdown since oil prices plummeted in mid-2014. GDP growth averaged 4.5 percent between 2001 and 2014 as stabilization reforms, including dollarization, triggered a recovery in the early 2000s. Real GDP increased 79 percent during this period, while real GDP per capita increased by 43 percent. High economic growth and changes in income distribution helped lift 1.4 million people out of poverty. Also, the commodity boom enabled an expansion of the public sector from the mid-2000s onwards, with public spending doubling between 2004 and 2014, particularly in public investment and wages. Yet, structural vulnerabilities emerged during this period and remained hidden by favorable external conditions during the commodity boom. The plunge in oil prices unveiled deep-rooted challenges, such as macroeconomic imbalances, public sector inefficiencies, weak competitiveness, and an underinvested private sector. In addition, the dismantling of oil funds, a selective external debt default, high external financing, and a non-conducive investment climate hampered the country's ability to respond to the decline in oil prices. Between 2015 and 2019, economic growth averaged a mere 0.5 percent as the rapid reduction of public expenditure was only partially offset by a modest private investment recovery—foreign investment has remained low and highly concentrated in extractive industries. Moreover, with little room for a fiscal stimulus, Ecuador struggled to mitigate the economic impact of the COVID-19 pandemic.

2. Since oil prices plummeted in 2014, Ecuador has taken steps to rebalance its economy. With a fully dollarized economy and limited macroeconomic buffers, the government has gradually reduced its fiscal deficit from a peak of 9.8 percent of GDP in 2016 to 2.8 percent in 2019 by rationalizing public investment. The government also fostered private-sector development by attracting investments to develop untapped mining resources, dropping import surcharges, reducing tariffs on selected products, advancing trade agreements, and allowing regional arbitration in foreign investment projects. Moreover, the authorities have deepened this reform agenda during the COVID-19 pandemic, which plunged the economy into a deep recession and led to a debt renegotiation with international bondholders. In addition, the government has continued rationalizing public expenditures, has introduced a mechanism to phase out fuel subsidies, and has reformed the public financial management code, while also protecting the poor and vulnerable. Finally, it strengthened the Central Bank's autonomy and improved the business environment by lowering tariffs, simplifying the regulated interest rates scheme, and streamlining business regulations.

3. Yet, Ecuador struggled to mitigate the economic impact of the pandemic. In 2020, output decreased by 7.8 percent, pushing a million people into poverty as a tight fiscal situation restricted the government's capacity to deploy a sizable stimulus package. Also, the COVID-19 crisis has increased labor market inequalities, disproportionately affecting young workers, particularly females. In the months of lockdown, the unemployment rate among young workers rose dramatically, reaching 31.7 percent for young female workers during the confinement period and 20.2 percent for young male workers. This means that about 300,000 young workers



were unemployed during the lockdown period. The unemployment rate in the lockdown for young workers was the highest in the last 30 years, including during the financial crisis of 1999. With the creation of formal jobs prevented by a labor regulation that remains rigid, informality and underemployment have stayed well above their pre-pandemic levels. This is because workers have limited access to social programs and have consequently turned to low-quality jobs in the informal sector.

4. The World Bank has been supporting the Government of Ecuador to mitigate the adverse effects of the COVID-19 pandemic on poor and vulnerable households through financial support and technical assistance.

Between May and June 2020, the government implemented an emergency cash transfer program for vulnerable households that did not benefit from existing social assistance programs. Technical assistance from the World Bank was used to develop a methodology for incorporating administrative data into the Social Registry and for estimating the amount of emergency transfer. Initial transfer consisted of two monthly installments of \$60 to 400,000 vulnerable households but later was expanded to an additional 422,000 beneficiaries with a \$120 one-time payment. The World Bank also supported the inclusion of nearly half of households benefit from the emergency transfers (those in the poorest three deciles) to the social registry, enabling them to qualify for regular cash transfers through the International Bank for Reconstruction and Development project (Ecuador Social Safety Net- P167416). Women represented 90 percent of beneficiaries of this expansion due to a deliberate effort to target female household members. In addition, two Development Financing (P171190 and P174115) loan operations totaling around \$1 billion were approved during 2020 to respond to the impacts of the COVID-19 crisis so as to protect the vulnerable. These measures focused on removing barriers to the private-sector development, supporting the economic recovery, and promoting public-sector efficiency and fiscal sustainability post-crisis. In addition, the World Bank implemented the \$150 million Ecuador COVID-19 Emergency Response Project (P173773) to support the communication strategy to control the spread of the disease and to strengthen critical aspects of health delivery so as to cope with the increased demand of services posed by COVID-19. The Project also helped finance medical and non-medical equipment and medical devices.

5. Fueled by improving external conditions and an ambitious vaccination campaign, Ecuador's economy ¹is expected to recover in the coming years, while sustained efforts to enhance the investment climate are expected to strengthen its medium-term prospects.

Despite the limited policy room to stimulate the economy and the ongoing consolidation process, GDP was projected to rebound by 3.9 percent in 2021, thanks to improving external conditions and the easing of mobility restrictions. Successful vaccination is expected to underpin the economic recovery. After the recovery period, economic growth is projected to hit around 2.6 percent in 2024, well above the 0.5 percent average recorded in the five years before the pandemic. As the bulk of envisaged fiscal consolidation will be implemented in the first two projection years, medium-term economic growth will be favored by a less intense fiscal compression and the early effects of policies designed to enhance the business environment. As mentioned above, the previous administration started implementing some growth-enhancement measures, including reducing red tape to open a business, simplifying the interest rate ceilings, and reducing trade barriers in a sustained manner. Building on these early efforts to catalyze domestic private investment and attract foreign direct investment, the present government is undertaking a range of regulatory changes, the goals of which include: promoting more flexible work arrangements; reducing trade barriers; enhancing trade integration; setting new arbitration mechanisms; reforming the Public-Private Partnership framework; promoting private investment by closing the digital gaps and generating non-conventional renewable energy; eliminating the tax on dollar outflows; streamlining regulation and licenses; and promoting access to

¹ The macro context was defined with data up to January 2022.



finance. Similarly, sustained efforts by the government to secure macroeconomic stability and reach a sustainable fiscal path are also expected to boost private investment in the medium term by reducing uncertainty around macroeconomic risks.

Sectoral and Institutional Context

6. The National Institute of Statistics and Censuses ('INEC' for its Spanish acronym) is the main official provider of statistics in Ecuador. The INEC is supported by the National Council of Statistics, which is made up of representatives from the National Planning Secretariat (which acts as chair), the Sectoral Cabinets, and the INEC (which serves as the technical secretary). The four main functions of the Council are: (i) supervising the performance of the National Institute of Statistics; (ii) ruling on the National Statistics Program that must be presented by the National Institute of Statistics and Census; (iii) ordering the implementation of national censuses and approving related plans and budgets; and (iv) obtaining financing for the execution of the INEC's work plan, among its other activities.

7. Another coordination mechanism is the Special Statistical Commissions. The INEC has the faculty to create these Commissions, which are auxiliary bodies and act as advisers to the National Institute of Statistics. They comprise delegates from the institutions that produce and use statistical information for specific sectors. These Commissions have two types of working groups – strategic and technical – both of which are created by the INEC (which acts as their chair), the National Planning Secretariat, the Sectoral Cabinet(s), and the Ministries or sector-executing agencies related to the main objective of the particular Commission in question. Currently, there are 13 active Commissions, 11 of which are thematic and two of which are designed to address specific areas of interest under Ecuador's statistical priorities.

8. The National Strategy of Statistical Development (NSDS) is presently in the design phase and the national statistical program 2021-2025 is being implemented. With the support of Paris21, some awareness actions were carried out with main stakeholders of the National Statistical System (NSS), its user community, and data producers in order to start a strategic dialogue that could, in turn, help define the vision of the NSDS. This led to the identification of four strategic focal points: (i) statistical coordination; (ii) statistical production; (iii) statistical innovation; and (iv) statistical culture. In 2021, the INEC developed the National Statistics Program 2021-2025 based on a participative process. This Program establishes a roadmap for guiding the production of national statistical data that can be used to meet national planning needs and international commitments. It proposes a long-term vision that establishes NSDS's importance. The INEC adopts an organizational and managerial model based on decentralization. It also has a modern IT center that supports an efficient data management system. Data production by the INEC supports 51 of the 130 indicators under the National Development Plan 2021-2025.

9. The Statistics Act is outdated, although recently a law covering the protection of personal data was approved. The Statistics Act in Ecuador was issued by Supreme Decree No. 323, published in the Official Journal No. 82 on May 7, 1976. Adjustments to the Statistics Act are needed to align with technological advances in the field of information and communications, as well as emerging international and regional best practices in statistical management. The current law does not clearly establish the coordination of the INEC over the NSS, and with other producers of information outside the NSS, such as producers of administrative records and non-traditional sources of information. The shortcomings of the outdated law have been partially resolved through the issuance of the Executive Decree No. 77 (August 15, 2013), which empowers the INEC coordination faculties within the NSS, especially those related to: (i) the planning of statistical production; (ii) the implementation of a

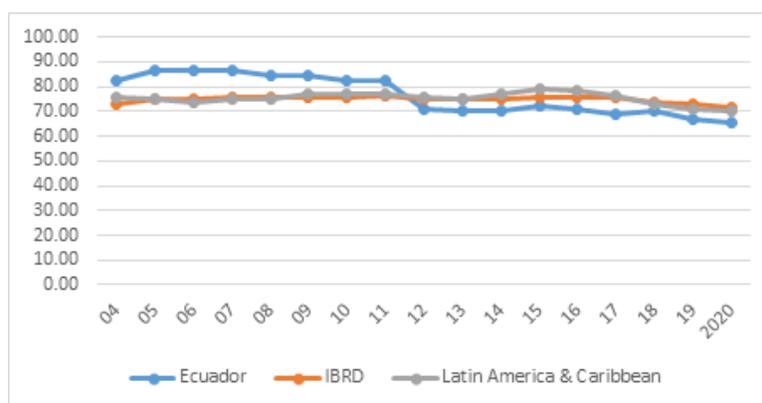


quality certification system; and (iii) the innovation in data collection and analysis. In addition, it allows the collection of administrative registers for statistical purpose by the INEC. It is desirable that the contents of the Decree be raised to the level of Law.

10. In the current Statistic Act, data protection and anonymization are addressed in Clause #21, which states that data must be aggregated for data protection, in line with the statistical oath. In May 2021, the Personal Data Protection Law was published by the official bulletin No. 450. This law aims to guarantee the right to data protection. It includes provisions about access to, and decisions about, information and personal data, as well as corresponding measures for the protection of such data. This law also provides definitions related to personal data, anonymization, and confidentiality of information. Finally, it creates a system for data protection and establishes sanctions for non-compliance with established protocols.

11. Ecuador's statistical capacity has been slowly decreasing over the last decade. According to the World Bank Statistical Capacity Indicator (SCI), the country's performance score during these years is lower than the average for Latin America and the Caribbean during this period. The same is true when comparing Ecuador to the average for International Bank for Reconstruction and Development (IBRD) countries. From 2004 to 2011, the SCI index score was significantly higher than the regional average or the IBRD average (Figure 1). The SCI index score for Ecuador in 2020 was 65.6 out of 100. This compares to 70.1 for Latin American and Caribbean countries, and 71.8 for IBRD countries (Figure 1). The main weaknesses of Ecuador's statistical capacity comprise: the outdated base year of the national account system and the consumer price index; out-of-date methodologies for the import and export prices indexes and for government finances accounting; the outmoded nature of the agricultural census and health survey; and the weak vital statistics system. The proposed project will cover most of the weaknesses highlighted through the SCI.

Figure 1 Statistical Capacity Indicator – Ecuador



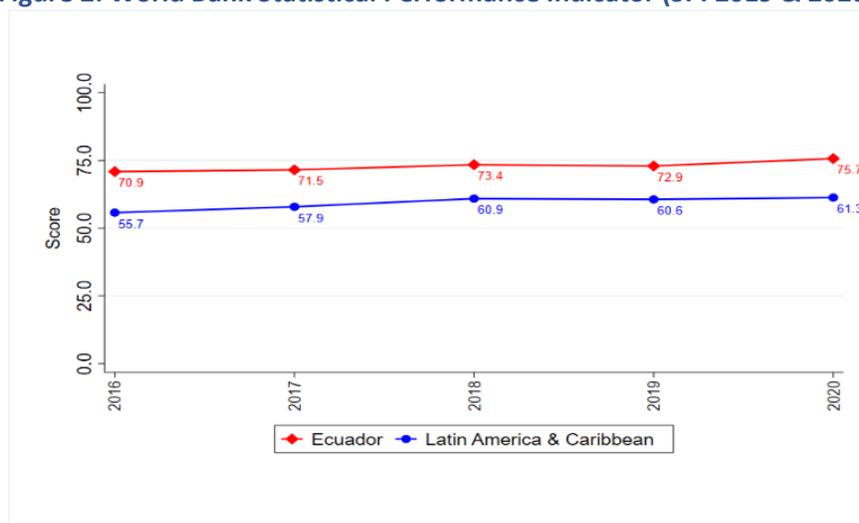
Source: Own estimations based on data from the World Bank's statistical capacity indicator, site <https://datatopics.worldbank.org/statisticalcapacity/scidashboard.aspx>

12. Despite the SCI score, the INEC has improved the quality of its data production and its role as NSS coordinator through the improvement of administrative data. The INEC is one of the leaders in the Latin America and Caribbean region on statistical production through administrative data, having adopted the Nordic model as a long-term strategy. Recently, the 50x2030 initiative has been adopted to improve agricultural surveys through innovative modular surveys. The project will complement the implementation of the modular approach. This initiative contributes toward the construction of relevant environmental indicators, some of which are part of the



SDG environmental indicators. Additionally, some other organizational best practices and innovation technologies for data management has been adopted. The new World Bank Statistical Performance Indicator (SPI) captures new dimensions not included under the scope of the SCI, where Ecuador scores higher than IBRD countries and its regional peers for the years 2016 and 2020 (Figure 2). This is the case with dimensions such as data use, data services, geospatial data availability, data access, and legislation, among others. The SPI considers more dimensions related to the performance of the INEC than to the previous SCI. Under the SPI, one of the weaknesses detected relates to data infrastructure. This captures aspects such as: statistical legal framework; standards and methods addressing compliance with recognized frameworks and concepts; statistical literacy; and finance mobilized both domestically and from donors.

Figure 2: World Bank Statistical Performance Indicator (SPI 2019 & 2020)



Source: Own estimations based on data from the World Bank Statistical Performance Indicators (SPI) , site

<https://www.worldbank.org/en/programs/statistical-performance-indicators><https://datatopics.worldbank.org/statisticalcapacity/scidashboard.aspx>

13. In summary, the national statistical system in Ecuador, considering the INEC and primary data producers' performance, and the institutional context, shows important strengths and critical challenges. The proposed project would address relevant information gaps and strengthen statistical capacity to promote the evidence-based approach. Some of the obstacles hamper the design and development of effective social policies. The basic family basket was built 40 years ago (1982), and it does not reflect current consumption patterns, thus affecting the quality of policy design. The poverty line is estimated using data from 2006, which is the basis for evaluating and designing social protection interventions. In this context, any distributional reform analysis (such as tax reform), plus any design or evaluation of social programs, are severely limited. The project aims to reduce these knowledge and information gaps.

14. The project includes the documentation of lessons learned, updating quality control and data dissemination protocols, and redesigning some managerial and organizational processes under the UNECE models. The project will promote the systematization of the learning processes derived from the project implementation and incorporate them into the INEC organizational and managerial model. The proposed project includes the documentation of lessons learned from innovations and improvement on data productions, the



elaboration of case studies, the implementation of learning by doing processes, and the development of statistical quality protocols and procedures. As a result of the lessons learned, some managerial and organizational processes will be redesigned following the UNECE models. The INEC methodological, technical and research units² will be benefited from this approach and will lead the adoption process of best practices. The project will be aligned to the existing activities lead by INEC under the United Nations Statistical Conference of the Americas, and the Regional Strategy of Statistical Development of the ANDEAN countries work plans.

Relationship to CPF

15. The proposed statistical operation is aligned with the objectives of the Country Partnership Framework (CPF) for Ecuador FY19-23. Specifically, the proposed project aligns with CPF Objective 6 to "strengthen evidence-based policymaking and transparency". This signals that the World Bank will focus on enhancing data collection at the national level for informing the CPF programs and on increasing the government's capacity for designing and implementing evidence-based policies.

16. The project will enhance the INEC's capabilities for data collection, analysis, and dissemination. Through targeted technical assistance, the project will support a new Housing and Population Census (HPC), a new Labor Force Survey (LFS), and upgrades to the Integrated Agricultural Survey, among other outputs. Data from these statistical operations will inform periodic and medium-term decision-making of public and private agents, and will assist with development planning, as stated in the CPF.

17. The project will also contribute indirectly to the monitoring of the indicators proposed under CPF Objective 5: "Strengthen the efficiency and effectiveness of social programs". Results from the Housing and Population Census and from the National Household Income and Expenditure Survey will enable the government to update the Poverty Maps and identify new areas in the country where the Social Registry needs to be updated. In this way, it will improve the targeting of programs and access to services for vulnerable individuals.

C. Proposed Development Objective(s)

18. The Proposed Project Development Objective is to improve the national statistical capacity of Ecuador in the production and dissemination of timely and high-quality economic and sociodemographic statistics for evidence-based policymaking.

Key Results (From PCN)

- Improved statistical capacity measured by a composite score derived from the World Bank Statistical Performance Indicator (SPI) methodology.
- Improved use of statistics measured by the percent increase in the number of downloads of datasets and reports supported by the project in the most recent six-month period relative to the six months before the beginning of the project.
- Increased availability of sector administrative data for statistical purposes.

19. Related to the first key results, rather than directly using the SPI, the Project proposes to use a simplified

² INEC has a specialized research and analysis unit named General Technical Coordination of Innovation in Metric and Information Analysis. This unit will play a key role in the INEC learning process during the project implementation.

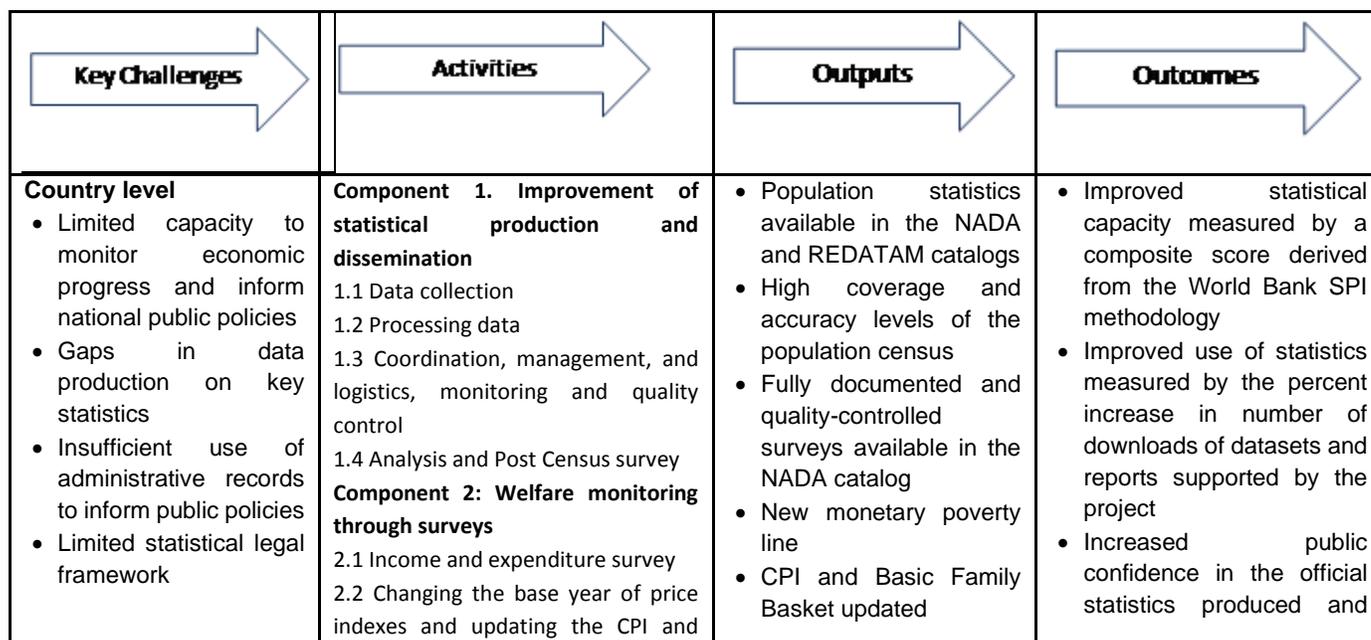


composite score created specifically for this program that will be measured and monitored in real time by the project team. Composite indicators like the SPI are useful for international benchmarking and monitoring, but their complexity presents a significant risk to effective project monitoring. The proposed indicator is the sum of ten sub-indicators included in the SPI, covering four out of the five pillars (Table 1). Its baseline score, obtained from the 2020 SPI, is 4.40 out of 10. The project is expected to improve directly or maintain the score of each of these indicators, achieving an end-of-project target of 8.0.

Table 1. List of SPI indicators included in the PDO indicator

Indicator	Baseline 2020	Target
Dimension 2.2: Online access	0.63	1.00
SPI.D2.2.Metadata.available	0.65	1.00
Dimension 3.1: Social Statistics	0.78	1.00
GOAL 5: Gender Equality (5 year moving average)	0.38	0.80
Dimension 4.2: Administrative Data	0.50	1.00
Agriculture survey (Availability score over 10 years)	0.00	0.50
Dimension 4.1: Censuses and Surveys - Surveys only	0.80	1.00
Dimension 4.1: Censuses and Surveys - Censuses only	0.67	1.00
CPI base year	0.00	0.75
Classification of status of employment	0.00	0.75
Total	4.40	8.80

Source: Own estimations.





	<p>basic family baskets</p> <p>2.3 Implementing the new Labor survey</p> <p>2.4 Incorporating the rotating modules of the agricultural integrated surveys</p> <p>Component 3. Improvement of administrative records</p> <p>3.1 Strengthen the architecture and infrastructure for collection, processing, storage, and visualization</p> <p>3.2 Create primary and complementary records - Data warehouse</p> <p>3.3 Construct an inter-thematic viewer - Data Ecuador</p> <p>3.4 Make a virtual information laboratory for INEC</p> <p>Component 4: Management and monitoring and evaluation of the Project.</p> <p>4.1 Establish the implementation unit of the PMU Project</p> <p>4.2 Monitor and evaluate the implementation of the project</p>	<ul style="list-style-type: none"> • Fully documented and quality controlled agricultural survey • Fully documented and quality-controlled labor survey available in the NADA catalog • Fully documented selected administrative records, merged, quality controlled and disseminated • PMU established and properly equipped • Preparation of quarterly reports of financial and performance monitoring projects 	<p>disseminated through the project</p> <ul style="list-style-type: none"> • Education and Health programs informed through improved administrative data • Improved production and availability of statistics, including gender statistics that provide better information on the nature and scale of gender-differentiated social and economic barriers Private sector decision-making informed
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D. Concept Description

20. The proposed project is aimed to improve the quality and the efficiency in data production of the three main categories of statistics: i) census, ii) surveys, and iii) administrative records. These statistics will consolidate the national statistical infrastructure needed to support the improvement of aggregated data and reach milestones such as updating the base year for the national account system, and consumer price index, among other statistics. The project will be structured in four components: (i) strengthening demographic information through implementing the VII Housing and VIII Population Census. The population census will use a multimodal approach (i.e., tablets, paper, and web) and gather personal identification numbers. This innovation will allow linking census information with other data sources; (ii) improving data production and dissemination covering the income and expenditure and employment surveys, plus the agriculture integrated survey as well as updating statistical products based on their results. These surveys will cover main data gaps critical for social programs and policies design; (iii) strengthening statistical production through administrative records, improving their accessibility and dissemination; and (iv) providing project management, monitoring, and evaluation. The project components and subcomponents (Table 2) were identified through discussions with the INEC and consultation with key stakeholders of the National Statistical System (NSS), civil society and NGOs, and development partners. This process will strengthen citizen ownership to support the sustainable implementation of the project.



Table 2: Components and subcomponents of the project

Component	Description
Component 1: Population Census	
Activity 1.1	Data collection
Activity 1.2	Processing data
Activity 1.3	Coordination, Management and Logistics, Monitoring and Quality Control
Activity 1.4	Analysis and Post Census survey
Component 2: Strengthening the statistical production from surveys	
Activity 2.1	Implementing the National Income and Expenditure Survey, and updating the poverty lines
Activity 2.2	Changing the base year of price indexes and updating the consumer price and basic family baskets
Activity 2.3	Implementing the New Labor Force Survey
Activity 2.4	Incorporating the rotating modules of the Agricultural Integrated Survey
Component 3: Strengthening the statistical production from Administrative Records	
Activity 3.1	Strengthen the architecture and infrastructure for capturing, processing, storage, and visualization
Activity 3.2	Create primary and complementary records - Data warehouse
Activity 3.3	Construct an inter-thematic viewer - Data Ecuador
Activity 3.4	Make a virtual information laboratory for the INEC
Component 4: Project Management	
Activity 4.1	Project Implementation Unit (PMU)
Activity 4.2	Project Monitoring and evaluation

Source: Own elaboration

Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No
Summary of Screening of Environmental and Social Risks and Impacts	

Environmental Risk Rating

21. Based on the available information, the proposed environmental risk classification for the project is Low under the ESF. This classification responds to: (i) the environmental risks resulting from the physical census execution are not significant as the activities refer to basic logistics and simple social interrelationships; (ii) tasks related to the improvement of the information processing laboratory do not represent environmental risks, either in terms of space and equipment; (iii) the operation will neither finance or require large civil works activities nor will it support other activities likely to cause environmental harm; and (iv) the project includes the purchase of



information technology equipment (approximately 18,000 tablets and a physical server) for the execution of the census, although this equipment or its components are not expected to generate direct adverse environmental impacts if disposed in accordance with the e-waste procedures recommended by the manufacturers. During project preparation INEC will identify a procedure for the proper management of potential electronic waste, including measures for prevention and mitigation in accordance with local environmental legislation and the ESF. At this time, no specific environmental studies will be required.

Social Risk Rating Moderate

22. Based on the available information, the proposed social risk classification for the project is Moderate. The activities to be carried out as part of the project do not involve any physical impacts on territories or communities, since they will essentially require information gathering from households to produce aggregated statistical data at the national level. The project will also finance the implementation of minor physical upgrades to laboratory facilities and office equipment, and refurbishments that will take place within the existing footprint of INEC's headquarters. The main social risks associated with this project are: (i) risks to community health and safety during census execution, when household members may be exposed to COVID-19 virus transmission, sexual harassment and assault, and become victims of criminals posing as enumerators; (ii) risks associated with occupational health and safety, since the health and/or physical integrity of INEC's field team during the data collection phase could be placed at risk when they work in unsafe neighborhoods or conflict areas, in addition to the risk posed by the transportation of personnel through unsafe roads; (iii) risks of sexual harassment and discrimination in the workplace, particularly resulting from the hiring of a significant number of enumerators, supervisors, and administrative staff, many of which will need to travel and use temporary accommodations; (iv) risks associated with the cultural sensitivity of the population, especially in indigenous communities, during the field visits and in communication campaigns; and (v) risks associated with the use of security forces, considering that INEC has mentioned that it will work with military security forces to provide support during the field phase, which may pose a risk to communities and individuals. These risks are associated with a context where the ability of the PIU to effectively monitor compliance with the relevant ESF provisions during the execution of the Project may be limited, particularly given the ongoing pandemic restrictions, along with the national scale of the project, in a country characterized by a high proportion of ethnic and racial minorities such as indigenous peoples, Montubios, and Afro-descendants (PIAMs), as well as other vulnerable groups.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating Moderate

23. Moderate. Risks related to sexual exploitation, abuse and harassment (SEA/SH) have been identified as crosscutting, and particularly relevant due to the deployment of a large number of people (enumerators/supervisors) who will be in contact with community members of different socioeconomic backgrounds, as well as accommodation conditions of personnel in the places where they will perform their work, could lead to the occurrence of this type of risk.



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APPROVAL

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