# Displaced & Disconnected

4 March 2021

Displaced & Disconnected (D&D)

- **Report** published in 2019 based on research undertaken with UNHCR country teams in late 2018
- Focused on identifying and removing legal and regulatory barriers to refugee access to **mobile connectivity, bank account and digital financial services**
- First wave of 20 priority countries: Afghanistan, Bangladesh, Brazil**, Burundi**, Cameroon, Central African Republic, Chad, Democratic Republic of Congo, **Ethiopia,** Jordan, **Kenya,** Lebanon, Mauritania, Niger, Nigeria, **Rwanda, Tanzania**, Turkey, **Uganda,** and Zambia
- Following the Venezuelan displacement crisis, expanded to study situation across Central and South America

CONNECTIVITY FOR REFUGEES

DISPLACED & DISCONNECTED

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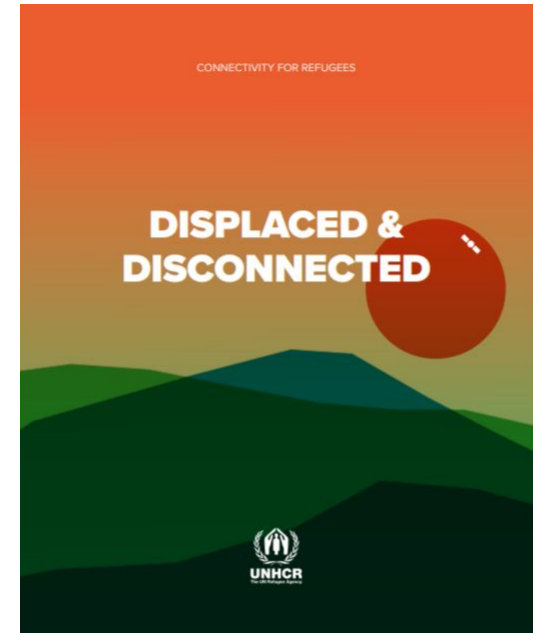
Why is this an important topic for economic inclusion and relevant to our work?

Following from the D&D research stream, UNHCR recognizes that one of the 'hard stops' for digital inclusion for displaced persons is **non-conducive regulatory environments**

In particular, **ID-related legal requirements** regularly prove a significant barrier to access

Consequences:
- Refugees may be further marginalized and disempowered as access to information, communication, cash assistance, and transfers is severely limited
- Informal workarounds in the case of lack of enabling environment can increase risks to PoCs
- The lack of legal certainty, inconsistently applied regulations or sudden changes in regulatory expectations as regards identification can disrupt the delivery of humanitarian assistance

An understanding of the legal context can also improve decision making & humanitarian programming

General findings

- Displaced persons consistently **face legal barriers to accessing SIM cards and opening bank and mobile money accounts in their own name**
  - **Policy issues:** government positions to restrict access to ID credentials
  - **Operational concerns**: delays in governments issuing ID credentials to displaced groups
- **Lack of recognition**
  - Government-issued asylum seeker/refugee IDs may not be considered by telecommunications or financial regulations
  - In other cases, UNHCR-issued ID credentials are not deemed to be legally valid for accessing mobile and financial services
- **Lack of harmonization**: Displaced persons' IDs may be suitable to register a SIM card but unsuitable for accessing a bank account or mobile money service, thus **stunting financial inclusion efforts**
- When legal access is not an option, for example in emergency situations, **workarounds** are sometimes an operational necessity, though they bring risk to both humanitarian organizations and end users

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EHAGL countries

Countries and Mobile Connectivity

Mobile Conn... ● N ● NA ● S* ● Y

Countries and Mobile Money

Mobile Money ● N ● NA ● S* ● Y

Countries and Bank Account

Bank Account ● N ● NA ● S* ● Y

Legend:

Y: Yes, without any restrictions (e.g. no requirements for ID documentation) or with restrictions which can be met easily by all members of the population of concern

S: Yes, though seldomly; i.e., with restrictions which are possible but not easy to meet or which can be met by some but not all members of the population of concern

N: No

NA: No information available

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EHAGL legal access summary

- **Burundi**: Refugees and returnees can access financial services with their refugee ID card and *attestation de rapatriement*, respectively

- **Tanzania**: As with connectivity, refugees in Tanzania are unable to open a bank account in their own name due to their lack of recognized identification documentation. Nonetheless, certain commercial banks have expressed interest in extending services to refugees

- **Kenya**: An alien ID (as opposed to a refugee ID) is key to legally accessing mobile connectivity and money, but is a 'legacy' credential not currently issued to refugees

- **Rwanda**: Refugee access to mobile connectivity varies depending on location (urban/rural); legal access to mobile money requires a national ID card

- **Ethiopia**: Only refugees and asylum seekers who have been issued with an ARRA/UNHCR ID card can legally register a SIM card; setting up a mobile money account has proven cumbersome for POCs

Uganda Case Study

- Following the D&D research, the GSMA Mobile for Humanitarian Innovation programme and UNHCR embarked on a joint advocacy effort to explore how access to mobile services could be improved for refugees in Uganda
- These joint efforts resulted in the Government of Uganda adopting a proportionate regulatory policy whereby the Uganda Communications Commission issued a more enabling directive to the mobile industry
- As a result, **refugees are now able to legally access mobile-enabled solutions and services in their own names**
- **Based on these experiences, UNHCR is building out advocacy across the region, together with partners.**

GSMA

Proportionate regulation in Uganda:
A gateway for refugees accessing mobile services in their own name.

February 2020

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Discussion questions

1. Are you also working on these or similar issues? Do these research findings resonate with your experiences?

2. Is the WG interested in collaborating with UNHCR Innovation Service on future research in this area?

3. Are there other legal/regulatory issues we should be exploring to enhance economic inclusion?

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