RE:BUILD
Boosting Livelihoods

Refugees in East Africa:
Boosting Urban Innovations for
Livelihoods Development

INTERNATIONAL RESCUE COMMITTEE

RE:BUILD
Securing Documentation Campaign (2025)
REPORT

August 14, 2025, Kyaka, Uganda. A participant at the community consultation meeting to gather information on challenges and provide recommendations to improve access to documentation for refugees in Uganda. Photo: Edna Karyne Kyokunzire for the IRC.

Contents

List of Abbreviations:

1. **CTDs** – Conventional Travel Documents
2. **DRS** – Department of Refugee Services
3. **EAC** – East African Community
4. **Ecitizen** – Kenya's Official Digital Government Services Platform
5. **ID** – Identity Document
6. **IDLO** – International Development Law Organization
7. **IEC** – Information, Education, and Communication
8. **IGAD** – Intergovernmental Authority on Development
9. **IPRS** – Integrated Population Registration System
10. **JRS** – Jesuit Refugee Service
11. **KCCA** – Kampala Capital City Authority
12. **LWF** – Lutheran World Federation
13. **NCCG** – Nairobi City County Government
14. **NGO** – Non-Governmental Organization
15. **NHIF** – National Hospital Insurance Fund
16. **NRC** – Norwegian Refugee Council
17. **NRB** – National Registration Bureau (Kenya)
18. *OPM* – Office of the Prime Minister *(Uganda)*
19. *PLAVU* – Platform for Vendors Uganda
20. **Rcts** – Randomized Control Trials
21. **RELON** – Refugee-Led Organization Network
22. **Re:BUiLD** – Refugees in East Africa: Boosting Urban Innovations and Livelihoods Development
23. **Rlos** – Refugee-Led Organizations
24. **RSD** – Refugee Status Determination
25. **R-SEAT** – Refugees Seeking Equal Access at the Table
26. **SHA** – Social Health Authority
27. **UGX** – Ugandan Shilling
28. **UNHCR** – United Nations High Commissioner for Refugees
29. *UPI* – Unique Personal Identifier *(Maisha Number in Kenya)*

Introduction

Lack of access to documentation remains a core issue that undermines refugee protection, inclusion and mobility and impedes refugees' access to essential services, including healthcare, education, social protection and employment opportunities.

The landscape of refugee documentation in the East Africa region has seen significant improvements in recent years, with member states, including Kenya and Uganda, harmonizing refugee laws and championing reforms. Yet despite this progress, refugees and asylum seekers continue to face several challenges in obtaining necessary documents, including Identification Documentation (ID) cards and travel permits.[1] These difficulties are further compounded by political, logistical, and bureaucratic barriers that refugees and asylum seekers encounter when trying to access various forms of documentation, impacting their socio-economic stability and violating regional human rights commitments.

It is against this backdrop that, in March 2025, the International Rescue Committee (IRC) Refugees in East Africa Boosting Urban Innovation for Livelihood Development (Re:BUiLD) program launched the *Securing Documentation Campaign for Refugees in Kenya and Uganda*. This campaign's objectives are to increase access to documentation for refugees in East Africa, and specifically in Kenya and Uganda, and to strengthen regional and national policy implementation mechanisms.

By amplifying refugee voices through documented case studies and evidence-based advocacy, the campaign envisions an environment where refugees can access critical government services such as health and education, establish small, medium, and large-scale enterprises, access job opportunities, and participate in national development and skills enhancement programs without impediments. Advancing refugee self-reliance, freedom of association, and upholding basic refugee rights are central pillars of the campaign, as forced migration and protracted displacement continue to challenge global efforts to ensure human rights and a dignified life for affected populations.

To guide the campaign, an advisory committee, comprising representatives from Refugee-Led Organizations (RLOs), government agencies in both Kenya and Uganda, regional bodies, non-governmental organization, legal experts, human rights defenders and United Nations agency representatives was established to oversee planning, facilitate coordination among stakeholders, shape the agenda, and review campaign products. The advisory committee was supported by the Re:BUILD Influence and Advocacy team. A detailed review of existing evidence on refugee and asylum seeker documentation in Kenya, Uganda and the East African region was also carried out as the foundation for discussions with key stakeholders in Kenya and Uganda. An overview of the campaign methodology and phase can be seen in Figure 1.

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[1] Kotut, J., Vos, A., Dempster, H., & Tang, H. (2024, March 6). *How Donors Can Better Support Urban Refugees in Kampala and Nairobi*. Center for Global Development. https://www.cgdev.org/ publication/how-donors-can-better-support-urban-refugees-kampala-and-nairobi

Figure 1: Campaign Methodology and Phases

Over a period of six months, the campaign sought to engage a wide range of key stakeholders in a series of consultations to gather varied perspectives and lived experiences regarding documentation challenges and propose actionable recommendations to improve refugee access to documentation and, ultimately, essential services and rights hindered by long-standing systemic barriers. As such, IRC and partners organized a series of consultations with 1) legal experts and human rights defenders, 2) refugees, refugee-led organizations (RLOs) and asylum seekers, and c) policy makers.

This report presents a summary of the challenges as well as actionable recommendations that emerged from the consultations in Kenya and Uganda.

Acknowledgements

This campaign was a collaborative effort spearheaded by the IRC's Re:BUILD program, in partnership with Refugee-Led Organizations (RLOs) such as R-SEAT, Umoja Refugee Creative (URC), RELON Kenya, CODE, RELON Uganda, and the Refugee Consortium of Kenya, People for Peace and Defence of Rights (PPDR Uganda) and Kyaka II Refugee Led Organization Network (KRLON) . It also involved legal experts from organizations including the International Commission of Jurists, Kenya Human Rights Commission, Haki na Sheria, the Law Society of Kenya, and the Refugee Law Project. Civil society organizations (CSOs) such as Oxfam International, Norwegian Refugee Council (NRC), PLAVU, UGANET, Lutheran World Federation

(LWF), and Jesuit Refugee Service (JRS) were actively engaged, alongside human rights defenders including Kampala Analytica, and the Office of the United Nations High Commissioner for Refugees (UNHCR).

Government authorities also played a key role, including the Department of Refugee Services (DRS) in Kenya, the Office of the Prime Minister (OPM) in Uganda, and the Intergovernmental Authority on Development (IGAD) in East Africa.

Key Takeaways

Common Challenges Across Countries and Stakeholders

Across Kenya and Uganda - and among refugees, legal experts, RLOs, and policymakers—there was broad convergence on the systemic barriers that continue to limit refugees and asylum seekers' access to documentation. The most consistent themes include:

- **Prolonged and unpredictable documentation processes:** Refugees in both countries face long delays in obtaining and renewing identification, travel, and civil registration documents. These delays restrict access to healthcare, education, livelihoods, and legal protection.
- **Centralized and bureaucratic systems:** Documentation services are largely centralized in capital cities or camp/settlement settings, forcing refugees to travel long distances at high cost and risk.
- **Non-recognition of refugee IDs by service providers:** Despite formal government recognition, banks, telecom companies, schools, and public institutions frequently reject refugee documentation.
- **Limited interoperability of data systems:** Refugee databases are not linked with national systems, creating inefficiencies and repeated verification hurdles.
- **Corruption and lack of accountability:** Refugees are often asked to pay bribes or rely on intermediaries to access services or expedite processes.
- **Language barriers and information gaps:** A lack of information in accessible languages and formats leads to errors in documentation, missed deadlines, and misinformation.
- **Discrimination and arbitrary practices:** Discriminatory treatment based on nationality, gender, or disability persists, particularly affecting vulnerable groups such as women, people with disabilities, and urban refugees.
- **Weak access to justice and legal aid:** Refugees have limited awareness of legal remedies, few interpreters in courts, and insufficient access to affordable legal representation.

Key Differences Between Kenya and Uganda

While both contexts share many systemic barriers, several country-specific distinctions emerged.

Area	Kenya	Uganda
Governance and Legal Framework	Kenya's Refugee Act and Maisha Number rollout raise data privacy and integration concerns.	Uganda's Refugee Act is progressive but inconsistently applied, with periodic suspension of registration for some nationalities.
Freedom of Movement	Movement passes are discretionary, and CTDs have limited recognition regionally.	Freedom of movement is legally guaranteed but poorly implemented; high CTD costs and police harassment persist.
Service Integration	Limited interoperability with national systems (eCitizen, IPRS, SHA).	Partial integration into national education and health systems, but weak in employment and finance.
Economic Inclusion	Refugees struggle to access work permits and register businesses.	Right to work is recognized but undermined by contradictory laws and employer practices.
Data Accuracy and Access	Refugee databases lack interoperability, leading to lost records.	Data errors and language issues are widespread; many refugees share identical or incorrect details.

Shared Recommendations and Priorities

Stakeholders across both contexts called for a coordinated, rights-based, and practical response emphasizing reform, inclusion, and accountability. Common recommendations include:

- **Digitization and decentralization:** Bring documentation and renewal services closer to communities through one-stop centers, mobile clinics, and digital platforms to reduce travel, costs, and corruption.
- **Legal and policy reform:** Enforce clear timelines for document issuance; harmonize laws to ensure refugee IDs and travel documents are recognized across all government systems and East African Community (EAC) member states.
- **Awareness and capacity building:** Conduct ongoing training for service providers, law enforcement, and judiciary actors; launch multilingual information campaigns for refugees.
- **Refugee inclusion and participation:** Institutionalize refugee representation in policy consultations, monitoring frameworks, and coordination mechanisms.

- **Access to justice:** Expand and fund legal aid and paralegal programs, accredit refugee paralegals, and provide interpreters in court.
- **Regional harmonization:** Strengthen EAC and IGAD-level coordination to enable mutual recognition of refugee documentation and facilitate freedom of movement.

Next Steps: From Dialogue To Action

To move from consultation to implementation, the following short- and medium-term actions are proposed:

National-Level Actions

- **Pilot decentralized documentation hubs** in major refugee-hosting counties/districts (e.g., Nairobi, Turkana, Kyegegwa, Kampala).
- **Issue an inter-ministerial circular** mandating all service providers to recognize refugee IDs and travel documents.
- **Digitize document processing** (renewals, status determination, CTD applications) with multilingual interfaces.
- **Launch joint taskforces** between OPM/DRS, civil society, and RLOs to monitor documentation service delivery.
- **Strengthen legal aid coordination** and fund legal aid working groups to address refugee documentation cases.

Regional-Level Actions

- **Engage the EAC Secretariat and IGAD** to establish a mutual recognition framework for refugee documentation and CTDs.
- **Create a regional advocacy coalition** of RLOs, legal experts, and NGOs to push for harmonized digital ID policies.
- **Conduct a regional data protection assessment** to ensure refugee inclusion in national digital identity systems with safeguards.

Programmatic Actions for Partners

- **Develop a regional advocacy roadmap** based on the findings of this campaign, aligning national and regional priorities.
- **Support refugee-led monitoring mechanisms** to track progress on documentation access and service delivery.
- **Build local partnerships** with media and artists to sustain public awareness campaigns on refugee rights and inclusion.

Roundtable Summaries

1. Legal Experts and Human Rights Defenders

Kenya

The consultation in Kenya took place on the 29th of July 2025, bringing together 51 (27F & 24M) representatives from civil society organizations, human rights defenders, and legal experts.

Several **gaps** in access to legal documentation were highlighted, including:

- Refugee IDs are held by only around 30% of refugees, and many service providers (e.g. banks) still do not recognize them despite gazetted recognition. There are a high number of uncollected IDs at the Department of Refugee Services, possibly due to the perceived inadequacy of the document.
- Birth registration services are largely unavailable in camps; discriminatory documentation of children born to mixed (refugee-citizen) families.
- Those applying for work permits (Class M) face high rejection rates and face systemic barriers including need for prior job offers.
- Issuance of movement passes is discretionary, geographically restricted, and there is no appeal process.
- The rollout of the Maisha Number (UPI) lacks consultation with refugees and raises data protection concerns.
- There is a lack of integration between refugee databases and national systems.

July 29, 2025, Nairobi, Kenya. Legal and human rights defenders participate in a roundtable discussion addressing challenges to proper documentation for refugees and asylum seekers.(Photo: Edgar Otieno for the IRC).

- Refugees are often afraid of seeking justice due to language, intimidation, and bureaucracy. Meanwhile, the Legal Aid Fund is unfunded.

Several **recommendations** were made to guide future engagement and follow-up, organized into short-, medium-, and long-term actions:

Short-Term (0–6 months)

1. Disseminate gazetted refugee document guidelines to all service providers and government departments.
2. Develop and distribute multilingual IEC materials on documentation rights and procedures.
3. Finalize and share simplified policy briefs on movement, ID, birth registration, and work permits.
4. Revive and fund Legal Aid Working Groups for strategic litigation and coordination.
5. Pilot Refugee Engagement Forums at county level (e.g., Nairobi, Garissa, Turkana).

Medium-Term (6–18 months)

1. Digitize movement pass and ID renewal applications to reduce queues and corruption.
2. Train Court Users Committees and administrative officers on refugee rights.
3. Amend Legal Aid Act to accredit trained refugee paralegals for representation.
4. Engage Parliament to amend sectoral laws (banking, telecommunications, education) to include refugee IDs.
5. Implement refugee data interoperability with national platforms (IPRS, NRB, e-Citizen).

Long-Term (18 months and beyond)

1. Institutionalize refugee policy participation through law (e.g., advisory seats in national commissions).
2. Advocate for Maisha Number reforms to ensure data protection, inclusion, and refugee ownership.
3. Expand Convention Travel Document (CTD) recognition across EAC and IGAD states.
4. Establish county-based refugee legal clinics supported by both local and international partners.
5. Integrate refugee documentation into the National Digital Identity Ecosystem with safeguards.

Uganda

The consultation in Uganda took place on 15 July 2025, bringing together 54 (22F&32M) representatives from civil society organizations, human rights defenders, and legal experts.

Several **gaps** in access to legal documentation were highlighted, including:

- **Restriction on urban registration of refugees**. Many Sudanese asylum seekers who arrive directly in urban centers, particularly Kampala, report being denied the opportunity to register

locally, instead being directed to travel to Kiryandongo refugee settlement for initial registration and documentation.

- **Language barriers.** Language issues can lead to misspelled names during the refugee status determination process, compromising legal identity. Corrections via statutory declaration or deed poll are costly, posing a financial burden on refugees.

- **Prolonged processes in acquiring refugee status documents.** Refugees in Uganda often face significant delays (1-3 months) in obtaining vital documentation such as asylum seeker certificates, refugee identification cards, and attestation letters. As a result, many refugees remain undocumented for extended periods, limiting their access to essential services such as healthcare, education, legal protection, and formal employment opportunities.

July 15, 2025, Kampala, Uganda. Mugisho Joyeux (wearing a blue shirt) from PPDR, a refugee-led organization, shares insights on the documentation challenges faced by refugees in Uganda during a roundtable meeting with Civil Society Organizations (CSOs). Photo: Edgar Otieno for the IRC.

- **Refugee status determination can be emotionally distressing**, as it forces individuals to relive past traumas without adequate psychosocial support, often impacting their mental well-being and the outcome of their cases.
- **Fraudsters taking advantage.** Fraudsters often exploit the vulnerability of refugees during documentation and status determination processes by posing as agents or officials who promise to expedite services in exchange for money.
- **Discrimination based on nationalities.** In January 2024, the Office of the Prime Minister (OPM) temporarily halted the registration and refugee status determination (RSD) for Somali nationals, followed in March 2024 by a similar suspension in March 2024 for Eritrean nationals. In both instances, no official communication was provided to explain the rationale behind the suspension, raising serious protection and accountability concerns.

- **Negligence and unprofessionalism in registration processes**. Refugees often experience errors during registration, including misspelled names and incorrect dates of birth, due to negligence or lack of professionalism. These mistakes can have long-term consequences, affecting access to services, legal identity, and future documentation processes.
- **Centralized services and travel distances.** Centralized services and travel distance create challenges, especially for refugees in transit or settlements. Travel to Kampala is often required for key procedures (e.g., validating academic documents, CTD applications, etc.).
- **Conflicting policies on Free Movement in the EAC Bloc.** Although the East African Community (EAC) promotes free movement of persons, goods, and services among member states, the implementation of these policies is inconsistent, particularly for refugees holding CTDs. While some countries recognize the CTD, others either reject it or impose additional requirements, such as visas or clearance letters.
- **Freedom of movement.** Despite legal guarantees under Uganda's Refugee Act and the 1951 Convention, refugees often face arbitrary arrests when traveling outside settlements due to lack of a travel permit. This is mainly due to limited awareness among enforcement officers, and misinterpretation of movement policies. The cost of acquiring a CTD is prohibitively high, averaging approximately UGX 223,000, which poses a significant financial barrier for many refugees. Language barriers remain a major challenge, as all travel-related forms are available only in English, excluding non-English-speaking refugees.

- **Impact on scholarships and other opportunities.** Delays in processing CTDs often result in refugees missing out on scholarships, educational programs, and business opportunities that require timely travel or identification.
- **Mental health impact.** Prolonged delays in obtaining CTDs, coupled with the threat of arrest by immigration officers, have a significant negative impact on refugees' mental health, contributing to anxiety, stress, and a sense of exclusion.
- **Limited understanding and prioritization of mental and psychological disabilities.** These are often misunderstood or overlooked by the judiciary, with physical disabilities receiving more attention due to their visibility. Courts lack the technical capacity to assess and respond to psychosocial disabilities appropriately.
- **Language barriers in courts**. Refugees and asylum seekers often lack access to interpreters, leading to miscommunication, unfair hearings, or delays in justice.
- **Lack of awareness of legal rights and procedures.** Many refugees are unaware of their legal entitlements, the steps to seek redress, or where to access legal aid, especially in relation to documentation issues.
- **Insufficient number of legal aid providers.** The availability of free or affordable legal representation is limited, especially for complex documentation cases such as statelessness, birth registration, or appeals on refugee status determination. Even where legal aid is available, associated costs such as transportation, notary fees, or obtaining supporting documents may be unaffordable.
- **Discrimination and bias.** Some court officials and law enforcement officers hold prejudices against refugees or perceive them as outsiders, leading to unequal treatment and limited access to remedies.

- **Bureaucratic delays and complex procedures.** Refugees face long waiting times and complicated legal processes that are difficult to navigate without legal assistance.

Several **recommendations** were made to guide future engagement and follow-up:

- **Create safe space platforms for reporting corruption issues.** Establish safe, accessible, and confidential platforms for reporting corruption to promote accountability and trust within refugee-hosting environments. These platforms should be designed to empower refugees and host community members to report cases of extortion, bribery, favoritism, and other forms of misconduct.
- **Digitalize refugee documents.** There is a pressing need to digitalize refugee documents by integrating easily recognizable security features to enhance authenticity, reduce fraud, and facilitate access to essential services. Currently, many refugee documents are paper-based, prone to damage, and vulnerable to forgery or non-recognition by key institutions such as banks, employers, health facilities, and law enforcement agencies.
- **Streamlining and amending laws**. Amendments should align national laws with regional (EAC Protocols, IGAD policies) and international obligations (1951 Refugee Convention, Global Compact on Refugees). This includes recognition of refugee documents across borders and streamlined legal provisions for cross-border movement, education, and employment. Synchronizing systems across the East African region would also enable mutual recognition of refugee documents (e.g., IDs, travel documents), reducing arbitrary arrests and border delays. A coordinated regional system would also improve access to essential services like healthcare and education for refugees relocating within the region, minimizing service disruptions.
- **Simplify the process of acquiring a CTD.** Decentralizing the process of acquiring a CTD at settlement level is essential to improving access, reducing delays, and upholding the rights of refugees to freedom of movement. Digitalizing the process would further help reduce costs, minimize time wastage, and eliminate unnecessary bureaucratic delays.
- **Provide court interpreters in the courts of laws.** For refugees, many of whom do not speak the official language(s) of the host country, the provision of court interpreters is essential to ensure fair legal processes, especially in matters related to documentation, civil rights, or criminal charges.

2. Refugees, Rlos and Asylum Seekers

Kenya

The consultation in Kenya took place on 17 July 2025, in Nairobi, and was attended by 54(25M&29F) refugees .Refugees across Kenya—in both urban and camp settings—highlighted persistent and systemic barriers to accessing essential documentation, which directly impacts their ability to access services, rights, and opportunities. The major concerns raised include:

- **Access to, and recognition of, documentation:** Refugees face delays and unpredictability in obtaining identification documents such as refugee IDs, asylum seeker passes, and

Convention Travel Documents (CTDs), and the process is often complicated by bureaucratic hurdles, corruption, and inconsistent procedures. In addition, refugee and government databases are not interoperable, leading to verification challenges. Finally, discrimination and limited awareness among service providers hinder acceptance of refugee documentation. Refugees with disabilities, for example, are sometimes denied services due to non-recognition of refugee documents.

- **Movement and travel:** CTDs are not recognized by many countries, restricting refugees' freedom of movement. Corruption, bias, and unclear procedures also affect the issuance of movement passes and visas and refugees have limited access to accurate information and feedback on travel application requirements.
- **Employment and business:** Refugee identification documents are often not recognized in online government systems such as eCitizen and work permit forms and procedures are not adapted to the specific circumstances of refugees. Refugees also face barriers to registering and licensing businesses due to documentation and regulatory constraints.
- **Healthcare and social protection:** The transition from NHIF to SHA has caused confusion and disrupted healthcare access for refugees, and the annual SHA contribution requirements are unaffordable for many refugees.
- **Education:** Refugees face lengthy and complex processes for certificate equivalence and school placement, and refugee students are often excluded from bursaries and scholarship opportunities. Inconsistent or missing refugee data on academic records creates barriers to enrollment and progression.

August 22, 2025, Nairobi, Kenya. Participants from refugee-led organizations engage in a breakout session to discuss challenges and propose recommendations during a documentation campaign roundtable meeting. Photo: Edgar Otieno for the IRC.).

- **Civil registration and legal identity:** Refugees have limited awareness of, and access to, birth, marriage, and death registration services. In many cases, lack of proper documentation and limited police awareness result in arbitrary arrests of refugees.
- **Financial and telecommunication services:** Refugees face restrictions in accessing banking, credit, and mobile money services due to regulatory barriers and the fact that refugee identification documents are not fully recognized under banking and telecom regulations.
- **Housing, land, and property rights:** Refugees are excluded from property ownership and access to housing finance. Discrimination also limits refugees' ability to rent or purchase property.
- **CBO/RLO registration:** Vetting and registration processes for refugee-led organizations are not legally anchored, and corruption and lack of proper documentation hinder CBO and RLO registration.

Following the identification of gaps and challenges, the forum proposed the **actionable recommendations below:**

Policy and Systemic Reforms
- Enforce clear legal timelines for the processing of refugee documentation.
- Simplify and streamline Refugee Status Determination (RSD) processes.
- Ensure refugee identification documents are recognized and interoperable across all government systems and sectors.

Capacity Building and Inclusion
- Strengthen the capacity of RLOs for documentation advocacy through financial and technical support, enabling them to engage directly with government authorities and campaign for refugee rights to documentation.
- Include refugee representatives and RLOs in campaign advisory boards, policy consultations and monitoring frameworks.
- Provide special recognition letters to RLOs from the Directorate of Social Services to act as reference letters during resource mobilization and to build trust with key funders.

Awareness and Sensitization
- Conduct continuous sensitization and training sessions for government officials, police, and service providers on refugee rights and documentation processes.
- Establish refugee desks at key public service points, such as health insurance offices, civil registration centers and banks.
- Raise awareness among refugees of their rights, available services, and documentation processes through community outreach and information campaigns.

Access to Services

- Integrate refugee identification into national banking, telecommunications and digital service systems.
- Amend relevant laws to allow refugees equitable access to housing, land, and credit.
- Facilitate access to disability certification and social protection programs.

Monitoring and Sustainability

- Establish a multi-stakeholder Monitoring and Evaluation task force with strong refugee representation.
- Engage media, artists, and community leaders to sustain public awareness and advocacy on refugee documentation and inclusion.
- Share consultation reports and campaign materials widely to promote transparency and accountability.

Uganda

The consultation in Uganda took place on 10 July 2025, in Uganda, and was attended by 44 participants (11F&33M). The conversation with RLOs elicited insights into the challenges refugees face in obtaining documentation, as well as exploring potential solutions and generating actionable recommendations.

The main **challenges** affecting documentation that were highlighted include:

- **Limited awareness.** Many refugees lack sufficient knowledge of documentation processes and requirements and have limited information on the importance of legal identity.

July 10, 2025, Kampala, Uganda. Participants from refugee-led organizations engage in a breakout session to discuss challenges and propose recommendations during a documentation campaign roundtable meeting. Photo: Edgar Otieno for the IRC.

- **Language barriers**. Service information is often not available in refugees' native languages and language issues can lead to misspelled names, compromising legal identity. Corrections are costly, posing a financial burden on refugees.
- **Centralized services and travel distances.** Centralized services and travel distance create challenges, especially for refugees in transit or settlements as travel to Kampala is often required for key procedures (e.g., validating academic documents).
- **Challenges among vulnerable groups.** Women and girls in rural areas face cultural and patriarchal barriers that limit access to documentation. People with mental and psychosocial disabilities are often overlooked by an under-equipped judiciary.
- **Prolonged processes.** Refugees in Uganda often face significant delays in obtaining vital documentation such as asylum seeker certificates, refugee identification cards, and attestation letters. As a result, many refugees remain undocumented for extended periods, limiting their access to essential services such as healthcare, education, legal protection, and formal employment opportunities, and leaving them more vulnerable to exploitation and arbitrary arrest.
- **Limited recognition of refugee qualifications.** A major barrier to refugee employment is the limited recognition of academic and professional qualifications obtained from their countries of origin. In many cases, refugees lack physical documentation of their credentials due to displacement, and even when documents are available, institutions and employers often reject them due to verification challenges. For example, Burundian nurses often face challenges obtaining practicing licenses in Uganda.
- **NSSF for refugees.** Accessing documents such as an NSSF number is difficult for refugees, as the process requires going through an NSSF employee rather than being accessible through self-service channels. This dependency creates delays, limits autonomy, and increases the likelihood of exclusion due to limited knowledge, mobility, or support networks.
- **Conflicting policies on free Movement in the EAC:** Although the East African Community (EAC) promotes free movement of persons, goods, and services among member states, the implementation of these policies is inconsistent—particularly for refugees holding CTDs. While some countries recognize the CTD and allow refugees to cross borders freely, others either reject it or impose additional requirements, such as visas or clearance letters. This creates confusion, restricts mobility, and limits refugees' access to regional opportunities.
- **Right to work.** The Refugee Act grants the right to work, but work permits are still demanded by some employers. In addition, there are contradictions between the NGO Act and the Refugee Act regarding refugees' right to work, making it difficult for NGOs to hire refugees.
- **Temporary suspension of refugee status provision specific nationalities.** In the past, the Office of the Prime Minister (OPM) has temporarily halted the registration and refugee status determination (RSD) nationals of specific countries, namely Somalia and Eritrea. In both instances, no official communication was provided to explain the rationale behind the suspension, raising serious protection and accountability concerns, particularly for new arrivals who are left undocumented and unrecognized.

- **Access to finance**. The ability to access banking and financial services such as opening a bank account and obtaining credit is often dependent on having a legal identity. Banks tend to devalue Refugee IDs, often insisting on rarely carried Family Attestation Cards. In addition, many financial products and services offered by banks and financial institutions are not tailored to the unique realities of refugees. Additionally, refugees are often perceived as high-risk clients, leading to limited access to credit, higher interest rates, or outright denial of services.
- **Siloed data systems limit real-time info sharing and coordination among actors.** The absence of integrated data systems across relevant government agencies and financial institutions hinders real-time information sharing and coordinated service delivery. This fragmentation leads to duplication of efforts, delayed interventions, and inefficient tracking of refugee needs.
- **Freedom of movement.** Freedom of movement is guaranteed, but refugees are often arrested when traveling outside of settlements to access services. This is mainly due to limited awareness among enforcement officers and misinterpretation of movement policies.
- **Barriers in accessing free primary education.** While Uganda guarantees free primary education to all children, including refugees, hidden costs such as language interpretation fees are imposed in some government-aided schools, particularly under KCCA. The lack of trained multilingual teachers and interpretation services further alienates refugee learners and hinders inclusive access to education.

Recommendations:

Following the identification of gaps and challenges, the forum proposed the **actionable recommendations below:**

Policy and System Integration

- Fully embed refugees within Uganda's national systems for health, education, and employment, promoting self-reliance, reducing long-term aid dependency, and ensuring equal access to services for both refugee and host communities.
- Integrate refugees in national and city development plans, ensuring local governments allocate resources and services that include refugee populations.
- Establish refugee employment targets and develop transparent policies and quotas to guide employers on refugee hiring.
- Strengthen institutional frameworks for evaluating and validating refugee credentials, including partnerships with foreign credential verification services.

Legal Identity and Documentation

- Bring documentation services closer to communities through mobile clinics, digital platforms, and local government one-stop centers.
- Advocate for waivers or subsidies on documentation costs for refugees and enforce non-discriminatory practices at service points.

- Conduct legal empowerment sessions, training both refugees and frontline actors (e.g., LC officials, teachers, health workers) on refugee rights and documentation procedures.
- Launch multilingual and culturally sensitive campaigns to inform refugees about legal documentation and rights.
- Tailor documentation services for Persons with Disabilities (PWDs), elderly, women, and offline users, including physical accessibility, low-literacy materials, and interpreter support.

Economic Inclusion and Financial Inclusion

- Work with banks and MFIs to develop inclusive financial products such as low-risk credit, mobile banking, and group savings models that reflect refugee realities.
- Capture and publish success stories and impact data on how refugees are contributing to the local economy, to shift public narratives and inform inclusive policies.
- Recognize private sector actors that hire refugees through an "Award for Refugee Employers", encouraging others to follow suit.

Partnerships and Coordination

- Enhance coordination between government entities, CSOs, UN agencies, and private sector actors through joint planning, data sharing, and co-delivery of services.
- Institutionalize the role of RLOs in policy dialogue, program design, and implementation, ensuring refugee voices are central to decisions that affect them.
- Strengthen RLOs for sustainable, community-driven solutions. This includes providing training in advocacy, legal literacy, project management, and fundraising.

3. Community Consultations

Kenya

A community engagement forum was held on September 15 and 21st, at Kasarani and Kawangware Kivuli Centre respectively. The meeting brought together participants from several countries, including Somalia, Turkey, Afghanistan, Eritrea, Ethiopia, Pakistan, Burundi, Rwanda, Congo, Sudan, and South Sudan representing both urban refugees in Nairobi, Nakuru and Mombasa and those in Dadaab and Kakuma refugee camps. Through the discussions, refugees highlighted pressing challenges in the documentation process, while also putting forward recommendations and action points to address these challenges.

Key issues raised by participants:

- Refugees are unable to obtain Teachers Service Commission (TSC) numbers despite having the required documentation.
- Only a few banks—primarily Equity and Postbank—accept refugees, and even then, the account-opening process is burdensome, often requiring unnecessary recommendation letters. Refugees who hold only *proof-of-registration* documents remain highly vulnerable because these documents allow access to bank accounts but not to other essential services.

- The Department of Refugee Services (DRS) takes excessively long to process change-of-address requests for refugees permitted to reside in Nairobi, making family reunification extremely difficult.
- The online registration links used at Nyayo House are not accessible for refugees with disabilities, preventing them from registering for government grants and services intended for persons with special needs.
- The Refugee Status Determination (RSD) validation process is significantly delayed, leaving many refugees without documentation for prolonged periods.

August 22, 2025, Nairobi, Kenya. Community engagement meeting in Kawangware aimed at identifying challenges and sharing recommendations to improve access to documentation for refugees in Kenya.Photo: Edgar Otieno for the IRC.

- For employment, refugees must present a certificate of good conduct; however, DRS offices frequently impose additional requirements—such as offer letters—that are usually issued only after the certificate is obtained.
- Many refugees enrolled in the Social Health Authority (SHA) scheme report receiving no follow-up, and some cannot afford the required payments. Participants emphasized the need for UNHCR to resume financial assistance for vulnerable families.
- Older persons also require timely registration so they can access government grants and social protection programs.
- The current arrival-registration process at General Mathenge is inaccessible, as new refugees are required to call the 1517 hotline even though many do not have mobile phones or SIM cards upon arrival.
- The 1517 hotline itself is unreliable, with reported cases of unprofessional conduct and excessive questioning.

- Refugee IDs and KRA PINs are frequently missing from government systems or appear under incorrect names, making it extremely difficult for refugees to access services.
- Mobile service providers such as Safaricom allow refugees to register only one SIM card, while Kenyan citizens can register multiple SIM cards.
- Travel document validation takes much longer than expected, causing refugees to miss opportunities related to education, employment, and urgent travel.

Recommendations

Following the identification of gaps and challenges, the forum proposed the **actionable recommendations below:**

- Expand the recognition of proof-of-registration documents so refugees can use them to access a broader range of services.
- UNHCR should reinstate financial support for vulnerable refugee households, enabling them to pay for SHA contributions when required.
- Establish dedicated service desks for refugees within key government offices to streamline support and reduce administrative barriers.
- Simplify and digitize the new-arrival registration process to make it more accessible, timely, and user-friendly.
- Introduce dedicated registration days or time slots for refugees to reduce congestion and improve service efficiency.

Uganda

A community engagement forum attended by 134 (75F&59) refugees from both Kampala and Kyaka refugee settlement was held on September 12 and 14 to create a dedicated space where refugees could collectively define the challenges and co-develop practical solutions. By placing refugee voices at the center, the forum generated recommendations to inform targeted advocacy with policymakers and relevant government institutions.

The meeting brought together participants from more than six nationalities including Somalis, Eritreans, Ethiopians, Burundians, Rwandans, Congolese, Sudanese, and South Sudanese representing both urban refugees in Kampala and those in Kyaka II Refugee Settlement. Through the discussions, refugees highlighted pressing challenges in the documentation process, while also putting forward recommendations and action points to address these challenges.

Challenges raised included:

- **Delays in obtaining documentation**: Refugees wait 3–6 months for family attestation cards needed for healthcare, education, and banking. These delays limit access to essential services. Refugees often experience delays in obtaining passports. Even after passports are ready, the Ministry requires a background check with OPM that typically takes three weeks, causing refugees to miss important opportunities. The process of obtaining CTDs is also lengthy, often taking so long that by the time they are issued, the opportunity that required

them has already passed. Some nationalities face discrimination in issuance, and processing takes up to six months. In addition, some countries do not recognize Uganda's CTDs, leading to lost opportunities for refugees.

- **Challenges obtaining birth certificates**: Although every child has the right to a birth certificate, many refugee mothers are discharged from health facilities without them. They are asked to return after three weeks, but the documents are rarely issued. Repeated follow-ups result in endless postponements, leaving many children without legal proof of identity.
- **Incorrect data on documents:** Errors in refugee documentation are common. For example, all individuals registered in 2022 were recorded as being born on 1st January, regardless of their actual birth dates. Names are also frequently misspelled, leading to mismatches between academic certificates and identification documents, which undermine access to education and employment.

- **Challenges with TIN and NSSF registration**: Refugees face discrimination in accessing tax and social security services. Obtaining a Tax Identification Number (TIN) costs refugees 200,000 UGX, while it is free for nationals. Additionally, the application process requires traveling to Kampala, increasing financial and logistical barriers.
- **Difficulties in obtaining death certificates:** Securing a death certificate is especially difficult when a person dies at home. Challenges multiply if the deceased was the household head listed on the attestation card, as their signature is required for monthly stipend disbursements. Replacing the household head on the attestation card often takes 4–6 months, leaving families without access to essential services.

August 14, 2025, Kyaka, Uganda. A participant at the community consultation in Kyaka II Refugee Settlement shares insights on the acquisition of a death certificate, especially when a person dies at home. Photo: Edna Karyne Kyokunzire for the IRC.

- **Barriers to education:** Refugee children entering Uganda in Senior 5 or 6 are sometimes placed in Primary 6 due to limited English proficiency. This demotion wastes years of study and causes frustration among both students and families. Refugee children in settlements also face barriers to registering for final exams, as they are required to provide National Identification Numbers (NINs), which they do not have. Families often feel compelled to obtain Ugandan national IDs illegally for their children to access exams.
- **Employment discrimination:** Refugees face challenges in securing employment in Uganda. Many resort to acquiring national IDs in order to compete fairly with Ugandan nationals for job opportunities.
- **Restrictions on freedom of movement:** Although refugee IDs and attestation cards are supposed to guarantee freedom of movement across Uganda, refugees are frequently arrested by authorities, who insist they must remain in designated camps rather than living in host communities.
- **Expired or non-renewable attestation cards:** Many refugees are struggling with expired attestation cards. When they attempt to renew them, they are often told that the system is down. Expired cards are rejected by banks and other institutions, preventing refugees from accessing essential services.
- **Suspension of registration for specific nationalities:** Eritrean refugees reported being denied refugee status without clear justification, leading to frequent arrests, fear of movement, depression, and isolation. An estimated 13 refugees reportedly commit suicide annually due to lack of documentation.
- **Access barriers in application processes**: Online CTD applications require English proficiency, smartphones, and internet access, which many refugees lack.
- **Discrimination in housing:** Landlords charge refugees higher rent after discovering their status, worsening vulnerability.

Participants also put forward several recommendations to address these challenges:

- Streamline and decentralize CTD processing (OPM & Ministry of Internal Affairs): OPM should work closely with the Ministry of Internal Affairs to complete verification and background checks immediately once refugee CTD requests are made. OPM should be granted authority to issue CTDs locally, rather than requiring refugees to travel to Kampala. This would reduce costs, minimize delays, and ensure services are handled by officials who better understand the refugee context.
- Ensure timely issuance of birth and death certificates (Ministry of Health & OPM): Birth certificates should be issued during the second immunization visit, rather than postponing the process indefinitely. Linking birth registration to immunization will ensure timely issuance, reduce bureaucracy, and prevent children from growing up undocumented. Death certificates should be issued at OPM offices rather than solely at district offices. Centralizing this service at OPM would increase accessibility, ensure fairness, and ease the burden on bereaved families.
- Improve accuracy in data collection (OPM): OPM should hire data enumerators with proficiency in local languages to avoid errors caused by mispronunciations or language

barriers. This will ensure that refugees' names and personal details are accurately recorded, preventing long-term challenges with mismatched documentation.

- Enhance access to URA and NSSF services (URA & NSSF): URA and NSSF should establish service branches in Kyegegwa District to bring essential services closer to refugee-hosting communities. This would reduce costly travel to Kampala and improve service delivery. In addition, TIN numbers should be issued to refugees free of charge, consistent with the treatment of Ugandan nationals.
- Bridge English language gaps in education (Ministry of Education & Sports): Refugee students should be enrolled in a one-year intensive English language program before joining mainstream classes. This would enable them to integrate effectively into the Ugandan education system, avoid unnecessary demotions to lower grades, and reduce emotional distress.
- Introduce digital registration and renewals (OPM): OPM should establish an online system for refugee registration and renewal of documents. A digital platform would allow individuals to input their details directly, reducing errors in names, dates of birth, and other personal information while easing congestion at physical offices.
- Establish a clear service referral pathway (IRC & Partners): IRC should develop and disseminate a clear referral pathway outlining where and how refugees can access documentation and related services. This would improve awareness, reduce confusion, and ensure refugees approach the right institutions for timely support.
- Advocate for harmonized regional travel policies for refugees, engaging the EAC Secretariat to recognize CTDs across member states.

4. Policy-Makers Forums

Kenya

The high-level policymakers' roundtable in Kenya took place on 30th and 31st October 2025 and convened over 35 (16M& 19F) representatives from government ministries, departments, agencies, independent commissions, county governments, humanitarian organizations, and RLOs, as part of both the Securing Documentation campaign as well as a complimentary Refugees Access to Work campaign led by RCK and Kituo cha sheria . The forum aimed to create a coordinated, multi-agency platform to address bottlenecks in refugee documentation and access to decent work, validate findings from prior consultations, and co-design a roadmap for policy and administrative reform. In their operating remarks, the DRS emphasized the roundtable's timeliness given the country's shift toward a socio-economic, development-oriented approach towards refugees under the Shirika Plan and highlighted that refugee are an underutilized economic asset and that access to decent work is central to dignity.

The National Registration Bureau (NRB) highlighted their mandate and achievements, including issuance of over 920,000 refugee ID cards, reduction of processing times from three months to two weeks, rollout of new-generation IDs integrated into IPRS, and nationwide registration via Live Capture Units.

In addition to positive developments, the forum unearthed **several challenges and gaps in implementation**. While participants agreed that legal and institutional frameworks are in place, operational bottlenecks, data fragmentation, and capacity constraints hinder efficient refugee service delivery. Addressing these systemic challenges will enhance protection, access to livelihoods, and socio-economic inclusion:

- Persistent challenges remain, such as overlapping mandates, fragmented coordination, limited data integration, delays in ID, RSD, and work permits, inconsistent policy interpretation, bureaucratic processes, and skills mismatches, underscoring the critical role of documentation for livelihoods, services, and protection.
- Public misunderstandings exist surrounding the difference between refugees and economic migrants.
- Barriers are sometimes due to the failure of agencies to recognize refugee IDs.
- Agencies identified hurdles in the documentation process. DRS pointed to limited capacity across state institutions. NRB noted repeated referrals from other agencies due to limited recognition of refugee IDs. Immigration highlighted gaps in public awareness and employer hesitance, despite the Class M permit having a simplified set of requirements. The Ministry of Labour stressed the need to address skills barriers and improve information flows to workers and employers. IPRS explained that gaps in linkages between primary and secondary databases force refugees to move between agencies.

Various practical solutions were put forward to address remaining challenges:

- Establish a one-stop shop for all services, namely through the establishment of a refugee desk at Huduma Centers.
- Organize period inter-agency technical working group meetings to promote a coordinated approach by state actors.
- Centralize data management systems, improve data integration and put in place real-time data sharing mechanisms.
- Review and revise application tools for work permit applications, providing clear timelines and verifying and aligning documentation before submission.
- Support recognition of prior learning and trade test assessments.
- Participants explored options for a coordination mechanism to advance refugee documentation and decent work reforms, focusing on using existing government structures rather than creating new ones. Two options were discussed: the National Coordination Mechanism on Migration (NCM) and Shirika Plan coordination structures. No final decision was made; the next meeting will determine the most suitable platform.

Uganda

The meeting in Kampala took place on the 21st August 2025 and brought together a wide range of stakeholders, including Members of Parliament, representatives of IGAD, UNHCR, the International Development Law Organization (IDLO), the Office of the Prime Minister (OPM), the Ministry of Gender, Labour & Social Development, Uganda Prisons Service, the Ministry of Internal Affairs, RLOs, as well as national and international organizations.

The consultation unearthed similar challenges and gaps to those that were discussed during the consultations with other constituents, and led to the formulation of various recommendations:

Policy and Legal Considerations

- Barriers affecting refugees should be clearly identified as legal, systemic, or administrative to inform targeted solutions.
- Policies should differentiate among refugee categories (political, economic, and armed) while balancing refugee protection with host community interests.
- Clear definitions of refugee entitlements, limitations, and obligations are needed to prevent misinterpretation and misuse of rights.
- Political neutrality of refugees should be emphasized, alongside compliance with national laws and avoidance of illegal acquisition of national IDs.

Service Delivery and Administration

- Documentation processes should be digitized, decentralized, and harmonized across institutions such as OPM, police, prisons, and immigration to enhance accuracy and reduce corruption.
- Screening at reception centers should be strengthened to ensure transparent, efficient, and humane registration.
- Awareness should begin at the point of entry, ensuring refugees are informed about their rights, responsibilities, and available services.
- Access to justice for detained refugees should be improved through language support and digitized case management systems.

Regional Coordination and Policy Harmonization

- There is a need for regional policy alignment among EAC, IGAD, and AU member states to ensure uniform recognition of refugee documentation, freedom of movement, and shared responsibility.
- Security measures should be strengthened at porous borders while maintaining humanitarian principles.

Social and Economic Inclusion

- Financial institutions should be engaged to design refugee-friendly financial products that promote access to savings, loans, and livelihood opportunities.
- Recognition of educational and professional qualifications should be simplified to enable access to higher education and formal employment.
- Inclusion of refugees in sports and community activities should be promoted as a tool for social cohesion and talent development.
- Public awareness campaigns should highlight refugees' contributions to counter stereotypes and foster peaceful coexistence.

August 28, 2025, Kampala, Uganda. Hon. Bhoka George Didi, Member of Parliament for Obongi, one of Uganda's refugee-hosting districts, provides feedback on a report highlighting challenges and sharing recommendations to improve refugees' access to proper documentation. Photo: David Hangi for the IRC.

Conclusions and Next Steps

The Securing Documentation Campaign in Kenya and Uganda surfaced a consistent and urgent message across all stakeholder groups: documentation remains a foundational barrier to refugee protection, rights, and socio-economic inclusion. Despite progressive legal frameworks and pockets of administrative improvement, refugees continue to face prolonged delays, inconsistent recognition of documents, centralized and inaccessible services, weak data systems, discrimination, and gaps in legal aid and accountability. These challenges cut across sectors—from healthcare and education to employment, finance, justice, and mobility—reinforcing how deeply documentation shapes every aspect of refugees' lives.

At the same time, the consultations demonstrated a strong willingness among government institutions, RLOs, civil society, and regional bodies to collaborate toward practical and rights-based solutions. Stakeholders highlighted tangible entry points for reform, including digitization, decentralization, improved data interoperability, strengthened legal aid, regional harmonization, and the formal inclusion of refugee voices in decision-making forums. The campaign also underscored the leadership and expertise of refugee communities themselves, whose lived experiences and proposals form a critical foundation for effective policy and administrative improvements.

One of the campaign's immediate outcomes has been the creation and subsequent launch of country-specific Step-by Step Guidelines, developed in close collaboration with DRS and OPM, respectively, to guide refugees and asylum seekers on how to obtain different identification documents.

The campaign's findings reaffirm that securing access to documentation is not a narrow administrative issue—it is a prerequisite for dignity, economic participation, safety, and long-term resilience. Moving forward, sustained coordination, accountability, and resourcing will be essential to translate momentum from dialogue into measurable improvements in refugees' daily lives.