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# Urban Refugee Policies and Legislation in Kenya and Uganda

2025 Stocktake

THOMAS GINN · HARRISON TANG

## Abstract

Policy for urban refugees in Kenya and Uganda is rarely at the forefront of national discussions, leaving important gaps that could potentially be addressed with engagement from civil society. Based on a series of key informant interviews, this policy paper provides a stocktake of recent shifts in policies, legislation, and practices impacting urban refugees in both countries since 2022. We document several changes, most notably the inclusion of urban refugees in Kenya's national social security scheme and in local government councils in Kampala, but these initiatives are yet to be scaled. We recommend that organizations advocating on behalf of urban refugees focus directly on access to documentation and, more broadly, prioritize concrete objectives that are achievable under current law.

## Urban Refugee Policies and Legislation in Kenya and Uganda: 2025 Stocktake

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## Introduction

Kenya and Uganda are among the largest refugee-hosting countries in Africa, with refugee populations of 843,165 and 1,858,060, respectively, as of April 2025 (UNHCR, 2025a; UNHCR, 2025b). A significant proportion of these refugees reside in urban areas, namely the capital cities of Kampala and Nairobi. According to the United Nations High Commissioner for Refugees (UNHCR), thirteen percent (111,902) of Kenya's refugees reside in Nairobi, while nine percent (159,086) of Uganda's refugees live in Kampala (UNHCR, 2025a; UNHCR, 2025c). However, policy for urban refugees in these countries is rarely at the forefront of national discussions, leaving critical gaps that could potentially be addressed—and make a tangible difference—with engagement from civil society.

Kenya has historically enforced an encampment policy that restricts most refugees to camps, curtailing their freedom of movement and access to work. These policies are expected to liberalize with the implementation of the new and progressive Refugees Act of 2021, which greatly expands refugees' legal rights to economic integration. However, it remains unclear whether and how these rights will tangibly materialize for urban-based refugees. National and county authorities are currently shaping the specific regulations and policies for the law's implementation, primarily through the recently launched Shirika Plan (MINA, 2025). Meanwhile, Uganda maintains an open-door policy that grants refugees equal rights to freedom of movement, employment, and access to public services under the Refugees Act of 2006. But in practice, refugees in cities like Kampala face integration challenges that are frequently overlooked, including limited access to essential documentation (e.g. work permits and driver's licenses) and a lack of formal assistance (Ginn et al., 2022).

At the 2023 Global Refugee Forum (GRF), the governments of Kenya and Uganda<sup>1</sup> reaffirmed their commitments to advance socioeconomic inclusion for urban refugees (Kotut et al., 2024). These pledges built upon learnings from the implementation of the 2017 Global Compact on Refugees (GCR) through the Comprehensive Refugee Response Framework (CRRF), which included strategic programming for urban refugee livelihoods.<sup>2</sup> The Kenyan and Ugandan national pledges were complemented by joint city pledges from the Nairobi City County Government (NCCG) and Kampala Capital City Authority (KCCA).<sup>3</sup> These city-level pledges included commitments to institutionalize refugee access to essential city services, integrate refugees into planning processes, and develop coordination methods with external partners to improve service provision (Re:BUiLD, 2023a).<sup>4</sup> These movements reflect the growing salience of urban-based refugees to government stakeholders at the national and local levels, as well as prospective opportunities to tangibly shape policy outcomes.

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1 Uganda was a co-convenor of the 2023 GRF. See GCR (2024) for an overview of Uganda's GRF roadmap.

2 See IMPACT Initiatives (2022) for a comprehensive evaluation of Uganda's CRRF implementation. The national action plans for urban refugees focus on secondary cities, rather than Kampala. For Kenya, CRRF implementation was stalled by limited buy-in from national policymakers. See O'Callaghan et al. (2019).

3 NCCG is developing an Integration and Community Building Strategy to shape additional pledges. See Nairobi City County (2023a) for an official county statement.

4 The KCCA and NCCG pledges are being implemented with support from the Re:BUiLD program and other partners including the Mayors Migration Council, Kampala Platform for Vendors, and Pamoja Trust. See Re:BUiLD (2023b).

This brief follows the 2022 Re:BUiLD report, *An Analysis and Evaluation of Refugee-related Policies and Legislation*, which discusses the legal frameworks governing refugees in Kenya and Uganda (Re:BUiLD, 2022). Focusing on refugees residing in Nairobi and Kampala, the report covers urban refugees' access to social security, education, work, justice, and finance. It identifies developments in policy and practice, along with persistent gaps, and provides recommendations to enhance refugee integration and self-reliance.

In Kenya, despite some legislative progress, refugees experience continued labor market discrimination and lack appropriate pathways for education and vocational training. In Uganda, urban refugees are largely unable to access humanitarian assistance and legal services, suggesting shortcomings in the implementation and/or enforcement of the country's existing comprehensive frameworks.

The report concludes that both countries have made commendable progress in laying the necessary legal groundwork to support refugees' livelihoods. However, government stakeholders must prioritize the practical implementation of these policies to ensure refugees can exercise their rights, access essential services, and meaningfully integrate into their host societies in practice.

Based on a series of key informant interviews (KIIs), this policy brief provides a stocktake of shifts in policies, legislation, or practices toward urban refugees in Kenya and Uganda since 2022. Given ongoing reforms to refugee management in both countries, it is important to monitor where urban refugee needs may be overlooked in national and city-led development plans. This brief aims to identify areas where advocacy efforts of Re:BUiLD, the International Rescue Committee (IRC), and other civil society actors focused on urban refugees should be directed at the national and local levels.

Building upon the findings of the 2022 report, we guided our initial desk research and the KIIs with the following overarching questions.

- Has there been progress (or back-sliding) in de jure and/or de facto practices for urban refugees in Kenya and Uganda?<sup>5</sup>
- Where should advocacy efforts towards local and national governments be added or reduced in the next 2–3 years?

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5 The 2022 Global Refugee Work Rights Report provides a snapshot of refugees' rights by law (de jure) and in practice (de facto) in Kenya, Uganda, and 49 other countries. Indicators include the right to work, freedom of movement, and other factors of economic inclusion such as access to education, healthcare, and financial services. See Ginn et al. (2022) and [www.refugeeworkrights.org](http://www.refugeeworkrights.org).

Overall, we note some changes in government policy and practice since 2022—most notably the inclusion of urban refugees in Kenya’s national social security scheme and in local government councils in Kampala—but these have been relatively minor. Further, there has been considerable dialogue in Kenya around the Shirika Plan, with proposed policy changes at the national level, but the implications for urban-based refugees are unclear and likely small.

We offer two sets of recommendations for advocacy organizations working on behalf of urban refugees in Kenya and Uganda:

- The first set recommends a focus on documentation issues. This involves working with individual clients to address their cases and identifying specific bottlenecks for accessing each form of refugee identification. Integrating case management services with broader advocacy provides immediate documentation support for urban refugees, which key informants noted is lacking, while also mobilizing the necessary conglomeration of cases to present to relevant stakeholders for systemic reform.
- The second set recommends a process to identify (and exclude) further topics of focus. This process includes devoting resources to concrete, achievable objectives that are consistent with current law, and avoiding broad dialogues where most actors’ involvement has little chance of affecting outcomes for refugees. We recommend conversations on prioritization, with consideration of the organization’s comparative advantage, as time is a valuable resource.

## Methodology

Key informants were recruited primarily from the IRC’s professional networks and selected based on their diverse areas of policy expertise. From December 2024 to March 2025, we conducted 13 KIIs with an array of informants including civil society members, business association leaders, local government officials, and refugee leaders. The first set of KIIs prioritized individuals with insight into national-level policies to identify broader shifts in de jure rights for urban refugees. Subsequent interviews focused on tangible changes in practices by NCCG and KCCA officials and areas where urban refugees face the most significant barriers, new or ongoing. We spoke with program staff and leaders who work directly with urban refugees to understand recurring challenges that have been reported. Respondents also referred us to additional experts with firsthand knowledge of informal discussions with city governments and where policy progress is most likely. In addition to the KIIs, we supplemented our findings with desk research of secondary sources.

The remainder of this brief discusses some of the recent developments and dialogues in Kenya, followed by those in Uganda. The brief concludes with recommendations for advocates in civil society organizations focused on urban refugees in both countries.

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# Kenya

## Legislation, policies, and regulatory frameworks

Kenya has historically maintained a restrictive legal and policy environment for refugees, characterized by its encampment approach. The Refugee Act of 2006, the first national refugee legislation, imposed strict limitations on refugees' freedom of movement and employment. Although the government has periodically announced plans to close major camps—including the Dadaab and Kakuma complexes—these closures have not materialized. Despite its protracted encampment model, Kenya adopted the Comprehensive Refugee Response Framework (CRRF) in October 2017 and pledged to integrate refugees into national development plans. Progress on these efforts largely stalled for several years due to the absence of a dedicated implementation structure and internal disagreements among policymakers (O'Callaghan et al., 2019).

In 2020, Kenya formally launched its CRRF roadmap through the Support for Host Community and Refugee Empowerment (SHARE) initiative. This established a National Steering Committee tasked with advancing three core objectives: enhancing refugee protection, addressing the imminent needs of refugees and hosts, and promoting regional cooperation and global responsibility sharing (Government of Kenya, 2020). These commitments laid the groundwork for significant policy developments, culminating in the passage of the Refugees Act of 2021, which provides the essential legal and policy framework for CRRF implementation.

At the national level, the Refugees Act of 2021 marks a significant legislative milestone for urban refugees, as it explicitly recognizes refugees' right to work and establishes provisions for refugees to move more freely in “designated areas” outside of camps (Refugees Act, 2021). The law underpins Kenya's global commitments to promote socioeconomic integration for refugees and transition away from a settlement model dependent on humanitarian aid, as outlined through the 2017 GCR. The Refugees Act of 2021 also aligns with regional commitments such as the 2019 Kampala Declaration on Jobs, Livelihoods, and Self-Reliance in the IGAD region<sup>6</sup> and the 2023 Munyonyo Declaration on Durable Solutions for Refugees in the East and Horn of Africa, which both affirm refugees' rights to access formal employment (ILO, 2023a). Furthermore, the African Charter on Human and Peoples' Rights (“Banjul Charter”) plays a complementary role in guaranteeing the right to asylum, the right to free movement, and the right to work in equitable, satisfactory conditions (Organization of African Unity, 1981).<sup>7</sup>

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6 The Intergovernmental Authority on Development (IGAD) in Eastern Africa is a regional bloc that comprises Djibouti, Ethiopia, Somalia, Eritrea, Kenya, and Uganda. South Sudan and Sudan had their participation suspended in 2021 and 2024, respectively. See Annex 1 of the IGAD policy framework on refugee protection for a list of relevant international, continental, and regional instruments. See IGAD (2024).

7 The legal framework of the Banjul Charter guarantees rights for every individual, including refugees.

## Shirika Plan

Significant policy discussions are ongoing at the national level, though the effects on urban refugees under the current framework are likely indirect. In February 2022, the Government of Kenya, in partnership with UNHCR, unveiled the Shirika Plan—the overarching implementation strategy for the 2021 Refugees Act. The Shirika Plan is a multi-year initiative designed to transform existing camps into integrated “urban settlements,” aiming to enhance livelihood opportunities and improve service delivery for both refugees and hosts (Halakhe et al., 2024). The Shirika Plan builds upon development and integration efforts in Garissa County, home to the Dadaab refugee complex, and Turkana West, which hosts the Kakuma camp and the Kalobeyei refugee settlement. The specific implementation plans have been subject to significant debate within national policy discourse and continue to evolve. Key informants expressed that civil society organizations (CSOs) and refugees alike had limited scope to directly influence the drafting processes. Kenya officially launched the plan in March 2025, which includes three phases extending to 2035.

The Shirika Plan's integrated settlement model is a direct extension of the Kalobeyei Integrated Settlement, established 40 kilometers from Kakuma Camp in 2015. The design and operationalization of the settlement has been guided by the Kalobeyei Integrated Socio-economic Development Plan (KISED), which spans four implementation phases from 2016 to 2030 under an area-based, multi-sectoral approach (UNHCR, 2018). KISED includes guidelines for “urban governance” and the development of an “Integrated Strategic Urban Development Plan” for Kalobeyei and the neighboring town of Lokichogio (UNHCR, 2018). In March 2023, Turkana County conferred Kakuma as an independent municipality encompassing the Kakuma camp, Kalobeyei Integrated Settlement, and the local township (Turkana County Government, 2023). This municipalization process was made possible by the Urban Areas and Cities (Amendment) Act 2019, which lowered the population requirement for an area to be classified as a municipality from 500,000 to 250,000 residents (Urban Areas and Cities (Amendment) Act, 2019).

A similar development strategy has been implemented in Garissa County through the Garissa Integrated Socio-Economic Development Plan (GISED), which is structured in two phases from 2023–2027 and 2027–2032 (County Government of Garissa & UNHCR, 2023). The recently released guidelines for the Shirika Plan incorporate both the KISED and GISED as foundational pillars, alongside additional frameworks on policy enhancement, skills development, natural resource management, and human resource capacity-building, among others. While the Shirika Plan, KISED, and GISED reference urban development strategies, they do not explicitly alter existing practices or policies toward refugees in Nairobi or other secondary cities. This gap suggests that urban refugees may continue to face limited policy support and restricted access to services, despite broader integration efforts.

## Local level

The most likely avenue for progress for policies toward urban refugees is at the local level. National policies set the groundwork for refugee inclusion, but local governments are best positioned to address the bottlenecks that prevent urban refugees from fully realizing their rights in practice.

As noted by the Mixed Migration Center (2022):

“City government policies and programs have not always followed national policy. For example, in Nairobi, the City Council acknowledged the benefits of greater economic integration of refugees earlier, and allows them to register businesses. Indeed, developing relationships with local government actors strengthens the protection of urban refugees, especially those at risk. The Nairobi County government has coordinated with humanitarian organisations to facilitate broader assistance. For example, relationships established with District Commissioners responsible for areas with a large refugee presence have helped raise awareness of rights and challenges, creating opportunities for UNHCR to participate on district boards or support efforts to enrol refugee children in schools. City government authorities are also involved in identifying non-registered refugees.”

There has been a promising increase in buy-in from NCCG to engage on this front. The previous County Integrated Development Plan (CIDP) for 2018–2022 made no mention of refugees, referring only to “vulnerable persons” (Nairobi City County, 2017). The current CIDP for 2023–2027 now acknowledges refugee socio-economic inclusion as a key objective of the Refugees Act 2021, though its only proposed county intervention is the “promot[ion] [of] sports for social integration and cohesion” (Nairobi City County, 2023b). To address these gaps, NCCG intends to launch the Nairobi City County Refugee Integration and Community Building Strategy (NCRICS) later in 2025. The NCRICS will serve as a blueprint for pilot integration strategies in other towns, focusing on three pillars: education, economic empowerment, and social cohesion (Nairobi City County, 2023a). Although the initial NCRICS technical working group did not engage major refugee stakeholders, NCCG has since conducted consultative forums to establish relevant integration benchmarks with government agencies, donors, and refugee and host communities.

## Documentation

Access to legal documentation is a critical issue for refugees in Kenya, affecting their ability to access services, work legally, and move freely. Section 28 of the Refugees Act of 2021 guarantees refugees the right to documentation that enables them to seek gainful employment or to practice a profession or trade for which they have acceptable qualifications. Despite these legal provisions, interviews for this brief consistently emphasized that access to multiple forms of documentation remains a significant challenge for urban refugees. This aligns with previous findings that urban refugees

face routine barriers to accessing essential services—including healthcare, education, and business support—without a refugee ID and/or other identity documents (Kotut et al., 2024).

The Department of Refugee Services (DRS) is the agency responsible for refugee status determination (RSD) and the issuance of documentation including refugee identity cards, asylum seeker passes, movement passes, conventional travel documents (CTDs), recognition letters, and proof of registration. These six documents are recognized as official refugee identification by government service providers per the Refugees Act of 2021 (Legal Notice 143, 2023).<sup>8</sup> But while Kenyan nationals can access most services with just their national ID, urban refugees must navigate inconsistent documentation requirements across national, city, and private services. For instance, refugees must provide multiple forms of ID to enroll in public schools, access healthcare, and open bank accounts (Halakhe et al., 2024). The lack of a single, standardized ID leads to more complex registration processes and frustration for many urban refugees.

The process of obtaining refugee identification through RSD is also lengthy and confusing. In recent years, RSD backlogs in Kenya have surged amidst severe underfunding and capacity constraints within DRS (Kisia, 2024). As of January 2024, over 168,000 asylum seekers were awaiting RSD decisions, a sharp increase from 60,000 pending cases in March 2021 (UNHCR, 2024e; Re:BUiLD, 2022). These delays prevent urban refugees from obtaining necessary identification documents, precluding many from accessing social services and formal employment. Furthermore, many applicants report being unable to access updates on their RSD appointments, which are scheduled via a national hotline. Other asylum seekers report that the documents received from their initial RSD application do not specify a return date for their final case, eliciting further uncertainty. Additional reports show that the Civil Registration Service (CRS), which serves both refugees and host communities, is also facing a backlog in issuing birth certificates due to a shortage of birth registration forms (UNHCR, 2024a).<sup>9</sup>

Key informants also consistently identified access to work permits as a major challenge. Under the Citizenship and Immigration Act of 2011, refugees seeking employment in a specific “occupation, trade, or profession” are required to apply for Class M permits, issued at the national level by the Directorate of Immigration Services (Vuni & Iraqi, 2023). The permit application process is time-consuming and difficult to fulfill. Among other documents, applicants must submit their refugee ID, Kenya Revenue Authority (KRA) PIN, a recommendation letter from DRS, and a signed cover letter addressed to the Director General of Immigration Services (Vuni & Iraqi, 2023).<sup>10</sup> Furthermore, employers must justify why hiring the refugee applicant—rather than a Kenyan

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8 This was clarified by the Ministry of Interior and National Administration in September 2023 via Legal Notice 143. There has not yet been guidance on accessing private services using these documents.

9 DRS and UNHCR facilitate birth registration in refugee camps. For urban refugees, birth registration follows the same process as for Kenyan nationals and is conducted at local CRS offices (UNHCR, 2024a).

10 National passports are also listed as an application requirement, though refugees have been reportedly able to obtain Class M permits without them (Vuni & Iraqi, 2023).

national—is necessary. The “Form 25” application requires employers to submit sufficient proof that they are unable to hire someone locally with the equivalent skills, but provides no clear guidance for this arbitrary prompt (Department of Immigration Services, 2025). This is a high standard that few refugees successfully fulfill, as many have only received short-term skills training (Halakhe & Kara, 2025). Refugees are largely unaware of these complex requirements, are denied due to administrative errors, or abandon the process altogether due to lengthy average wait times of 3 to 6 months (Vuni & Iraqi, 2023).

Similar hurdles exist for business license issuance, a process governed by the Business Registration Services Act 2015. Refugees, however, generally report fewer barriers and inconsistencies in the application process for business licenses compared to work permits (Vuni & Iraqi, 2023). Access to driver’s licenses remains a complementary concern, as noted in KIIs. Many urban refugees work as rideshare drivers or motorbike operators but are unable to obtain driver’s licenses from the National Transport and Safety Authority. These issues can be partly attributed to the improper transfer of refugee registration data from DRS to the National Registration Bureau (NRB), which handles national identity records (Halakhe & Kara, 2025).

We have not seen systematic changes to refugee documentation requirements or practices since 2022. However, Kenya has initiated wider national reforms to documentation and identity management procedures, discussed in the next section, which do not include specific guidelines for urban refugees.

## **Maisha Namba**

In November 2023, Kenya launched the National Digital Identity Program, replacing the existing Integrated Population Registration System (IPRS). This new digital ecosystem includes a lifetime unique personal identification number (“Maisha Namba”), a biometric national identity card (“Maisha Card”), a virtual ID for smartphone use (“Maisha Digital ID”), and a centralized database integrating civil and national registries (Bitok, 2024). The Maisha Namba is intended to be used as a consolidated identifier for enrolling in government services including health insurance, social security, and schools (International Society for Human Rights, 2024). The Maisha Namba will also function as the KRA PIN, which is required for business registration and work permits. The rollout of the digital ID system is managed by the Directorate of Civil Registration Services (CRS) and the NRB. Since the program’s launch, the NRB has processed over 530,000 new applications (Kenya News Agency, 2024).

At the 2024 ID4Africa Annual General Meeting, Immigration Permanent Secretary Julius Bitok announced that refugees will be incorporated into Maisha Namba (Schoemaker, 2024). However, it is unclear how accessible this system will be for urban refugees, at what point refugees would be issued the Maisha Namba, and whether it will affect access to essential services. Key informants were unaware of any inter-agency guidelines to ensure refugee IDs remain valid for registration in government services. Civil society organizations (CSOs) have also expressed broader concern over

the exclusion of stateless people and called on the Ministry of Interior and National Administration to prioritize the inclusion of marginalized communities, particularly those lacking documentation (Wambui, 2024).

The Maisha Namba system faces similar legal challenges to its digital ID predecessor, Huduma Namba, which was discontinued in 2020 following a High Court ruling that found violations of the Data Protection Act and Public Participation Act of 2019 (Amnesty International, 2024; Kenya Human Rights Commission, 2020). Primary concerns involved data privacy, security gaps, and the potential exclusion of significant segments of the Kenyan population. While sensitization campaigns for Huduma Namba were held by registration officials in camps, there was minimal outreach to refugees in Nairobi. Many refugees in Kakuma and Kalobeyei reported distrust of the Huduma Namba system, commonly fearing that enrollment could lead to the loss of their refugee status (Millar, 2022). If such sentiments persist among urban refugees, they also could present barriers to registration for Maisha Namba.

Regional and county commissioners hosted a series of public participation forums on Maisha Namba and its accompanying draft regulations in September 2024 (Citizen Digital, 2024). However, key informants, including those at UNHCR, were unaware of any targeted forums designed to include the input of urban refugee communities. As urban refugees already report confusion over complex registration processes for businesses, work permits, and services, the Maisha Namba rollout could exacerbate documentation challenges if refugee-specific protocols are not included. On the contrary, successfully integrating refugees into government databases could help overcome one of the most significant hurdles to their inclusion. Similar initiatives have been welcomed by UNHCR, which recently supported the rollout of a new digital ID in Ethiopia in early 2024 (Dadi, 2024).

## Social security

In 2019, the National Social Security Fund (NSSF) launched the Haba Haba plan, a voluntary savings scheme that extends social security coverage to workers in the informal sector. The program was intended to be easily accessible for all Kenyan residents, with enrollment only requiring access to a mobile phone. Contributions are primarily made through the mobile money platform M-Pesa, which is widely used in Kenya, to encourage people to save routinely. Enrollees can withdraw up to 50 percent of their fund balance after five years of contribution, with the remaining balance becoming available for withdrawal at retirement age (World Bank, 2024).<sup>11</sup> However, many refugees have been precluded from the savings plan in practice.

First, refugee identification cards are not recognized as eligible forms of documentation for SIM card registration under the Kenya Information and Communication Act (ILO, 2024b). Key informants

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<sup>11</sup> Enrollees must meet the monthly minimum contribution of 400 Kenyan shillings (KSh) or annual contribution of 4,800 KSh to withdraw their fund balance.

noted that SIM card registration requirements are inconsistent across localities, as the national government's legal notice on acceptable refugee identification does not explicitly apply to private services. Some refugees are able to register for SIM cards with their refugee IDs, while others cannot. Secondly, refugees are not eligible for partial early withdrawals from Haba Haba under existing pension law, unlike Kenyan nationals. The NSSF Act of 2013 also does not establish any procedures for refugees to access the entirety of their deposits upon repatriation or resettlement. The absence of a legal framework deters refugees from enrolling in or contributing to Haba Haba, as there is no guarantee that they will be able to access their savings in the future.

These eligibility barriers for refugees and migrant workers were outlined in a 2024 assessment by the International Labor Organization and presented to the NSSF. According to a key informant, NSSF was highly receptive to ILO's engagement on refugee integration, as it aligned with their broader strategy to increase participation in the savings scheme. The ILO report recommended widespread awareness campaigns to inform refugee communities about the scheme and proposed new registration procedures to ensure equal access to social protection (ILO, 2024b).

In response, NSSF implemented a pilot program targeted at urban refugees and their host communities. UNHCR and IRC staff, as partners for the pilot, worked collaboratively to sensitize urban refugees about the Haba Haba scheme and provided direct assistance with in-person registration. While registration is typically completed through the NSSF's online platform, refugees were allowed to register in person to overcome potential digital access barriers. Through the pilot program, over 110 refugees were successfully registered and more than 1,000 refugees were reached through sensitization campaigns. To further improve accessibility, NSSF translated brochures from Kiswahili and English to over 25 additional languages to ensure broader access across diverse refugee communities.

On October 30, 2024, NSSF officially relaunched Haba Haba and extended eligibility to all refugees and asylum seekers (ILO, 2024a). To address documentation challenges, the national social protection scheme introduced new initiatives to simplify the registration process. Haba Haba now accepts alternative forms of identification for enrollment, including refugee ID cards, though SIM card registration remains a barrier (ILO, 2024a). DRS has pledged to collaborate with NRB to streamline the issuance of refugee IDs in order to support the scheme, though it is unclear to what extent this has occurred (ILO, 2024a). A key informant notes that officials are strengthening inter-agency communication on refugee access to documentation through routine meetings and information-sharing sessions. Refugees, as well as Kenyan nationals, can register in person at any NSSF office or Huduma Center.<sup>12</sup>

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<sup>12</sup> Huduma centers are centralized "one-stop shops" where individuals can access various government services. There are five Huduma centers in Nairobi County. See Huduma Kenya (2025).

As refugee outreach is a relatively new area for NSSF, key informants also suggested the agency would benefit from enhanced technical support and staff capacity-building. Moreover, refugee-serving organizations play a vital role in reaching urban refugees, given their established networks. A key informant suggested that NSSF could mobilize refugee leaders to sensitize their own local communities about the Haba Haba initiative. Leveraging trusted community figures could significantly improve perceptions of, and participation in, social security programs. Advocacy and sensitization efforts could also focus on engaging telecommunications providers to ensure a uniform, clear application of SIM card registration requirements. These efforts could be directly implemented by advocates without reforms to national law or policy.

Beyond registration and awareness efforts, key informants emphasized the importance of livelihood programs to economically empower refugees and enable them to contribute to social security in practice. One key informant recommended amending the NSSF Act to include a refugee-specific clause that allows full pension withdrawal upon departure from the country. Implementing this direct provision—while requiring legislative reform—would be simpler than establishing bilateral or multilateral agreements on the cross-border portability of social benefits.

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## Uganda

### Legislation, policies, and regulatory frameworks

The Refugees Act of 2006 is highly progressive and grants refugees the equal rights to work and free movement as Ugandan nationals. Despite this conducive legal environment, refugees face persistent integration barriers in urban areas, including employment discrimination and harassment from law enforcement officials, and are often unable to access necessary support (Kotut et al., 2024). Additional refugee inflows and resource constraints may exacerbate these concerns for both urban refugees and their host communities.

Uganda's third National Development Plan (NDP III) for 2020-2025 anticipates an increase in refugee arrivals, given persistent regional conflict and instability (National Planning Authority [NPA], 2020). This projection is in line with significant refugee inflows from the recent Sudan crisis. Since the onset of the Sudan emergency in April 2023, over 76,000 Sudanese refugees have been registered across the country, many of whom choose to settle directly in Kampala and other urban areas (UNHCR, 2024h). By the end of 2024, Sudanese refugees accounted for 41 percent of the more than 24,000 refugees registered in urban areas that year (UNHCR, 2024d). These figures likely underestimate the precise number of Sudanese refugees in urban areas due to new registration barriers, as detailed in the documentation section. Uganda also sees consistent refugee inflows from other neighboring countries.

But while Uganda's refugee population has now surpassed 1.8 million, global financing support for the refugee response is dwindling. In early 2024, the Minister for Relief, Disaster Preparedness and Refugees Hillary Onek Obaloker announced that the government might be "forced to review" its open-door policy for refugees in light of chronic funding shortages and humanitarian financing cuts (Guyson, 2024; Ninrew, 2024). Uganda only met 46 percent of its total funding requirement for the 2024 Uganda Country Refugee Response Plan, leaving a \$466 million gap (UNHCR, 2025b). Social services for refugees are overstretched, and the government is struggling to provide adequate assistance to settlement-based refugees. In May 2024, UNHCR reported that some refugees have begun migrating to neighboring countries, citing a lack of assistance and food ration shortages (UNHCR, 2024i).

Ugandan officials have long warned of these roadblocks and are repositioning their refugee strategies accordingly. At the 2023 GRF, Uganda called for a transition toward a more sustainable burden-sharing structure and an "alignment of partner investments within the NDP and DDPs [District Development Plans]" (Republic of Uganda, 2023). This call is consistent with Uganda's previous strategic roadmaps for CRRF implementation, which emphasized that the country's generous refugee-hosting policies are conditional on proportionate burden-sharing by the global community (Grzeńkowiak, 2023). Given the volatility of humanitarian aid, Uganda is explicitly adopting a development-oriented approach. Under the NDP III, the Ministry of Finance, Planning and Economic Development and the NPA are directed to integrate refugees into national, sectoral, and local government plans (NPA, 2020). This is listed as the first prioritized intervention and will be supported by the enhanced collection of data through national census and survey programs by the Uganda Bureau of Statistics, National Identification and Registration Authority, and local governments. These developments have the potential to improve support for urban refugees in the long run, as humanitarian assistance is generally limited to refugees in settlements.

## Local councils

One of the most prominent areas of exclusion for urban refugees—as identified in KIIs—is their representation in, and ability to access key resources from, local councils. Many employers require job candidates to produce a simple introductory letter from their local council-1 (LC1)<sup>13</sup> affirming their residency and good standing in their community. For urban refugees, this requirement poses a significant barrier as they often struggle to obtain these reference letters from their LC1 chairperson. LC1 leaders are frequently unaware of refugees' legal rights to work and free movement under the Refugees Act of 2006. Urban refugees are excluded from local registries in many jurisdictions, further complicating LC1 verification processes.

Due to these uncertainties, LC1 chairpersons are reluctant to issue recommendation letters for refugees and typically refer them to UNHCR for documentation support. The lack of LC1 recognition

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<sup>13</sup> The local council-1 (LC1) is the smallest administrative unit in Uganda, representing the village or neighborhood level.

for refugees' status generates hiring barriers, rendering them ineligible for many formal work opportunities. Beyond access to employment, refugees must also present an LC1 letter to open bank accounts, sell property, and participate in business associations such as the National Chamber of Commerce and the Federation of Small and Medium Enterprises. The IRC is actively engaging LC1 leaders on refugees' rights and legal status. As reported by key informants, some local councils have also launched initiatives to include refugees in their registries, which helps validate their legal status in the community.

Furthermore, Platform for Vendors in Uganda (PLAVU), a business alliance dedicated to fostering community and economic growth for refugees, is advocating for increased refugee representation within LC1 governance structures to the extent permissible under law. LC1 officials are responsible for resolving community disputes, which are arbitrated most effectively if they share a language and cultural understanding with their constituents. However, only Ugandan nationals are eligible to participate in LC1 elections under the Local Government Act, and the Refugees Act of 2006 explicitly prohibits refugees from participating in political activities. While refugees in settlements can access representation through Refugee Welfare Committees—independent, refugee-led leadership structures reporting directly to OPM and UNHCR—no equivalent governance system exists for refugees in urban areas like Kampala. This is a growing issue in neighborhoods that consist predominantly of refugees.

Given legal constraints, PLAVU has launched a pilot initiative to integrate refugees in LC1s through alternative avenues. In Kampala, local councils in Nagura 1 and Bwaise 2 cells have agreed to adopt refugees as ex officio members, while other councils are exploring opportunities for refugees to hold informal roles as administrative assistants. These successes at the most localized level demonstrate the potential for incremental progress in lieu of national policy reform. Further advocacy efforts are underway to engage KCCA on incorporating advisory guidelines for refugee LC1 inclusion in the next city plan for fiscal years 2025/26 to 2029/30. Such initiatives represent critical steps toward reducing administrative barriers for refugees and enhancing refugee participation in urban governance structures.

## Documentation

The Refugees Act of 2006 establishes the overarching legal framework for RSD and issuance of identification documents to recognized refugees. In practice, RSD procedures vary significantly based on the applicant's nationality, location of registration, and over time. Refugees of certain nationalities are granted status using a "prima facie" approach, meaning they receive automatic recognition based on readily apparent circumstances in their country of origin. Currently, Uganda uses a prima facie approach to recognize most individuals from the Democratic Republic of Congo

(DRC), South Sudan, and Sudan as refugees (UNHCR, 2024f).<sup>14</sup> These country designations have been subject to change over time in response to emerging crises. Other nationalities undergo individual status determination procedures.

RSD protocols vary across settlements and urban areas. For settlement-based refugees, the process generally entails initial arrival at the border, transfer to reception centers, asylum registration, and a short interview to confirm their nationality and eligibility for prima facie recognition (NRC, 2018). Refugees are then provided with transportation to settlements, where they can be allocated land and humanitarian support. As most of these refugees receive prima facie recognition, few settlements have standardized processes for individual RSD and often refer these cases to OPM for review on an ad-hoc basis (NRC, 2018).

Registration procedures in Kampala are particularly sensitive, fluid, and confusing. In January 2024, Uganda indefinitely suspended the registration of Sudanese refugees in Kampala and began directing them to the Kiryandongo refugee settlement to receive official documentation (Sultan, 2024).<sup>15</sup> Registration guidelines mandate that refugees reside in the settlement, and their location of residence is reflected accordingly. However, to qualify for assistance programs like Re:BUiLD, refugees in Kampala must be verified as residents by UNHCR and listed in their urban caseload. This means that refugees who register in the settlements and later move to Kampala must formally update their location of residence.

In March 2024, the policy was updated with an exemption for Sudanese refugees who are elderly, disabled, or have other special needs that make it difficult to travel (Sudan Tribune, 2024). These cases are reviewed and approved on an individual basis by the Commissioner for Refugees. Key informants report that OPM is engaging with UNHCR to build additional facilities near the current registration offices in Kampala, which could alleviate pressures and potentially lead to resumed Sudanese registration in urban centers. Additionally, OPM has established a separate registration desk in Kiryandongo for refugees who desire to reside in Kampala, creating a new channel for formal residency in the city (UNHCR, 2024g). From March to November 2024, a total of 573 households, amounting to 1,196 individuals, have requested relocation to Kampala (UNHCR, 2024c).

Despite the right to apply for asylum, OPM has notably halted individual RSD activities in response to larger inflows, citing capacity constraints and security concerns. These practices are fluid and can entail relatively short holds to indefinite restrictions. For instance, Uganda announced temporary RSD registration suspensions for Somalis in March 2023 and Eritreans at the beginning of 2025, with limited information on timelines for resumed processing. RSD has also been increasingly delayed

14 Prima facie status is granted to Congolese nationals from eastern DRC entering via designated border posts. Over 95 percent currently arrive at formal entry points in the Kisoro, Kanungu, and Kikuube districts (UNHCR, 2025d). Those who travel directly to Kampala or settlements for registration are processed through individual RSD (UNHCR, 2022).

15 Most new Sudanese arrivals are relocated from the Nyumanzi reception center in Adjumani to Kiryandongo (UNHCR, 2024g). Kiryandongo is located over 200 kilometers to the north of Kampala.

due to a backlog of asylum applications and purported human resource constraints following the COVID-19 pandemic. Refugees are entitled to efficient, timely RSD by law. Section 20 of the Refugees Act of 2006 stipulates a deadline of 90 days for applicants to receive their RSD decision, an ambitious target that has not been met in recent years. In 2023, Uganda received a total of 130,308 new asylum applications, leading to an average RSD wait time of nearly 1.5 years (UNHCR, 2024b).

From October to December 2023, the Refugee Eligibility Committee (REC) launched an accelerated RSD exercise in Kampala to address backlogs. The pilot targeted asylum seekers from Burundi, the Democratic Republic of the Congo, Eritrea, and Sudan, among other nationalities, and processed decisions for 7,235 households within 40 days (Norwegian Refugee Council, 2024b). Following the pilot, REC hosted an additional 14 sessions where they adjudicated 13,186 applications, reducing the average RSD processing time to 285 days for the reporting year (UNHCR, 2024b). While the government has implemented initiatives like these to expedite RSD, there have not been systematic reforms to the RSD process in recent years.

Beyond access to refugee IDs, which are issued following RSD, urban-based refugees also face broader documentation challenges. A 2024 report found that only one-third of interviewed households had proper birth registration for all dependents, limiting their access to public services (Norwegian Refugee Council, 2024a). Inconsistent documentation standards for refugees further hinder access to formal employment. Few refugees possess a convention travel document (CTD), which is the only form of documentation issued by the Directorate of Citizenship and Immigration Control (DCIC) that can be visibly stamped with a work permit (ILO, 2023b).<sup>16</sup> While refugees are legally exempt from work permit requirements, only an estimated one in four employers are aware of refugees' legal work rights (UNHCR, 2021; Loiacono & Silva-Vargas, 2019).

## Livelihoods

In terms of livelihoods, the only significant legislative change since 2022 noted by KIIs pertains to the new Markets Act. The Markets Act 2023 is the comprehensive legislation governing the administration of public and private markets in Uganda. The law replaced the Markets Act 1942, which lacked explicit procedures for vendor management and has been generally well-received by the public (Kalikumutima and Co. Advocates, 2024). To address these gaps, the Markets Act 2023 instituted several new provisions including free vendor registration, delegated authority for stall allocation, and mandatory vendor committees with elected representatives (Native Law Uganda, 2023). While the law was intended to promote fair, inclusive access to markets, it excludes refugees by requiring vendors to register with a national identification number, which refugees do not possess.

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<sup>16</sup> CTDs are temporary passports authorizing refugees to travel internationally. To obtain a CTD, refugees must submit documentation at the OPM Kampala office, receive a recommendation letter from OPM, and pay an application fee of 220,000 Ugandan shillings. Approved applications are forwarded to DCIC for processing and issuance (Tubulire & OPM, 2024).

This documentation requirement could prevent refugees from legally operating in markets despite their equal right to gainful employment under Section 29 of the Refugees Act of 2006.

As urban refugees work predominantly in the informal sector, exclusion from markets can significantly curtail their livelihood opportunities. Key informants report that some refugees have attempted to circumvent the vendor registration requirements by subleasing market stalls from Ugandan nationals. However, these informal arrangements expose refugees to potential harassment, discrimination, and exploitation from KCCA enforcement officers and other vendors. Reports also indicate that authorities have intensified crackdowns on street vendors in recent years, putting refugees who cannot access formal market spaces at heightened risk of fines, eviction, and/or confiscation of their goods.

In response, PLAVU has met with KCCA to discuss the ramifications of the Markets Act and reconcile its misalignment with refugees' legal work rights. This has led to ongoing discussions between the Lord Mayor of Kampala and the President on short-term solutions. One proposition under consideration is the establishment of a dedicated market for refugees to operate on weekends, though details are scarce. PLAVU is also engaging with the Ministry of Trade to include refugee-friendly registration provisions in the Markets Act, which will require longer-term advocacy for legislative reform. More broadly, key informants suggested that community outreach could have a meaningful impact. For instance, KCCA could implement awareness campaigns to educate enforcement officers and Ugandan business competitors on refugees' legal work rights, with an aim to reduce negative sentiment and/or harassment.

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## Recommendations

In recent years, Kenya and Uganda have reaffirmed their global and regional commitments to enhance socio-economic inclusion for urban refugees. These objectives have been pursued through incremental policy and legislative reforms, as detailed in this policy brief. However, major barriers remain. Despite Kenya's notable progress in operationalizing the Refugees Act of 2021, urban refugees remain largely overlooked in national and county integration plans. Meanwhile, in Uganda, access to documentation and livelihoods has regressed for some urban refugees, but government officials are working to address these constraints. Key informants from both countries consistently reported a genuine willingness among national and city officials to bridge policy gaps for urban refugees, as evidenced by their multi-stakeholder, consultative approaches.

This receptiveness presents a prime opportunity for CSOs to advocate for greater urban refugee inclusion in national and local planning. However, as outlined in the previous section, there has been minimal policy advancement for urban refugees, and the challenges they face remain substantial and largely unaddressed. Below, we offer several recommendations for how stakeholders engaging

with urban refugees specifically can focus their advocacy efforts to change this status quo and make a tangible impact on the lives of urban refugees.

First, we recommend prioritizing issues related to documentation and sensitization, which were noted frequently in KIIs. These issues are already enshrined in law, disproportionately affect urban refugees, and offer a realistic opportunity for progress with the scale and reach of organizations like the IRC and other civil society actors. Second, we propose a decision-making framework for identifying other topics of advocacy priority. We suggest that organizations focus on issues where they can establish concrete objectives, where governments (especially local governments) are willing to collaborate, and where the primary barriers to progress are limited information, the need for proof of concept, and/or a lack of non-profit partners.

These recommendations, particularly the topical section, apply mainly to organizations focused on urban refugees, the central focus of this paper. They are informed by the fact that fewer actors are in this space, that urban refugees have specific needs, and that advocacy efforts for national-level legislative and regulatory reforms will involve a wider set of stakeholders.

## Topical recommendations

### 1. **Address individual and systemic bottlenecks to documentation.**

There are numerous potential targets for advocacy, reflected clearly by the diverse range of ideas shared during our KIIs. However, access to documentation emerged as a consistent theme across nearly all discussions. Urban refugees require multiple forms of identification to access essential public and private services, but face frequent barriers to obtaining these documents in practice. These include refugee or asylum-seeker IDs, work permits, business licenses, and driver's licenses, as discussed in the documentation section. Unlike some other challenges urban refugees face, documentation practices are largely within the government's direct control, and the legal frameworks for refugee inclusion already exist. Simply put by one KI, "everything starts and ends with a refugee ID."

Organizations can begin by identifying affected individuals who are unable to obtain necessary documentation, which can be approached in a process similar to case management for legal aid programs. Some barriers to obtaining identification are well-established, such as backlogs in RSD for the issuance of refugee IDs in Kenya. However, the various barriers to obtaining other forms of identification, such as driver's licenses in either Nairobi or Kampala, are less clear. A strategic approach could involve collecting cases of individuals facing documentation issues and presenting them collectively to the relevant government agency with the support of an external organization. This synthesis approach could both assist the affected individuals and help the organization pinpoint systemic bottlenecks to target for future advocacy. Additionally, organizations often have established

connections with government officials, which most individuals lack. Leveraging individual cases and these relationships could enable advancements in wider, policy-level advocacy goals and improve documentation access for people beyond the original cases.

2. **Sensitize local officials on refugees' rights.**

Sensitization campaigns aimed at local officials about national and local refugee laws represent another promising avenue for advocacy. Key informants noted that local government staff often lack a basic understanding of refugees' legal rights. A cost-effective strategy could involve speaking briefly during LC1 meetings to inform them about relevant refugee legislation and policies, particularly in areas where refugees have faced routine challenges. Efforts to educate local law enforcement about acceptable forms of identification and common misconceptions—again, for issues reported by refugees—as well as formal businesses that might hire refugees are also worth the time of urban refugee advocates. Notably, we are *not* proposing large, expensive workshops to convene target stakeholders. Instead, short, basic meetings designed to provide essential information are likely to be easier to scale.

## Process recommendations

1. **Focus on achievable, concrete objectives where buy-in exists (or could).**

Some advocacy efforts we encountered focused on broad or vague goals, such as working on “economic empowerment,” rather than establishing a clear, actionable objective for governments. The most promising opportunities for progress lie in areas where laws are already inclusive of refugees and where bureaucracies are open to accommodate refugees, with some assistance. A prime example is the inclusion of urban refugees in Kenya's Haba Haba plan. In terms of legal frameworks, the NSSF Act already allows for any individual in the informal sector to participate. Furthermore, a feasibility study by the ILO and a parallel program by the World Bank demonstrated proof of concept for expanding access to refugees and migrants. This example illustrates the opportunities for progress where there are defined, targeted objectives, where the legal framework for refugee inclusion is already established, and where external organizations can offer research, proof of concept, and external support.

2. **Identify bottlenecks and target advocacy to these places.**

The prior recommendation on documentation outlines a straightforward process to compile evidence on refugees' challenges. This approach could be applied to other areas where urban refugees encounter barriers to accessing public or private services. Non-profit staff can use these individual stories to pinpoint specific barriers. As with the first process recommendation, these constraints should be as tangible as possible. Once identified, these constraints can be presented in advocacy workshops and convenings, as well as to higher-level officials who want to maintain relationships with external stakeholders. The

goal is to reconcile systemic barriers by equipping decision-makers with data and evidence drawn from a sample of affected individuals. Many potential proposals and solutions can be adapted to each context. These include (but are not limited to) new supporting frameworks at the local or national level, legislative changes, budget-setting, information campaigns, and partnerships with non-government actors. Identifying the most effective proposals will require organizations to identify specific bottlenecks and then present actionable data to relevant policy actors.

3. **Prioritize time and resources.**

Urban refugees face a considerable number of unaddressed needs, both immediate and long-term. Advocates understandably wish to address all these issues, but resources—particularly time—are limited. As organizations navigate the process of determining which policy topics to pursue, we recommend engaging in difficult conversations about prioritization. These discussions should consider the potential impacts on refugees, the organization’s comparative advantage, and the likelihood of success. One key informant noted that governments “are fond of putting things on paper, but little happens in practice.” This suggests that advocacy resources should be spent on practices and implementation, while avoiding drawn-out discussions over new plans. Another key informant described their attendance in over 40 government-led workshops aimed at “defining integration,” yet agreed these were not the best use of time. Participating in government-led conversations is often important, but advocates’ time is more valuable than is reflected in this example. A rigorous prioritization of issues set by the advocacy team, rather than largely following the government’s agenda, can lead to more tangible and impactful results for urban refugees in Kenya, Uganda, and beyond.

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## Works cited

- Amnesty International. (2024, September). *Ready or Not? Citizens' Perspectives on Maisha Namba*. <https://www.amnestykenya.org/wp-content/uploads/2024/09/Maisha-Namba-Report-FINAL-EDIT.pdf>
- Bitok, J. (2024, May). *Kenya's Digital Identity Ecosystem*. ID4Africa. <https://id4africa.com/2024/ps1/PS1-2-Kenya-Final.pdf>
- Central Emergency Response Fund (2015). *Resident/Humanitarian Coordinator Report on the Use of CERF Funds. Uganda Rapid Response, Conflict Related Displacement 2015*. [https://cerf.un.org/sites/default/files/resources/15-RR-UGA-15851-NR02\\_Uganda\\_RCHC.Report.pdf](https://cerf.un.org/sites/default/files/resources/15-RR-UGA-15851-NR02_Uganda_RCHC.Report.pdf)
- Citizen Digital. (2024, August 30). *Gov't Calls for Public Participation on Maisha Card*. <https://www.citizen.digital/news/govt-calls-for-public-participation-on-maisha-card-n348669>
- County Government of Garissa & United Nations High Commissioner for Refugees (UNHCR). (2023). *Garissa Integrated Socio-economic Development Plan Phase I (2023–27)*. [https://www.unhcr.org/ke/wp-content/uploads/sites/2/2023/09/GISED1\\_Main-Report\\_Final\\_26092023.pdf](https://www.unhcr.org/ke/wp-content/uploads/sites/2/2023/09/GISED1_Main-Report_Final_26092023.pdf)
- Dadi, S. (2024, May 24). *Inclusion in Ethiopia's ID System Opens New Doors for Refugees*. UNHCR. <https://www.unhcr.org/news/stories/inclusion-ethiopia-s-id-system-opens-new-doors-refugees>
- Department of Immigration Services (2025). *Application for Permit Class M: (Refugees (KEP/M))*. Retrieved May 2, 2025. <https://immigration.go.ke/class-m-refugees/>
- Ginn, T., Resstack, R., Dempster, H., Arnold-Fernández, E., Miller, S., Ble, M.G., & Kanyamanza, B. (2022, July 28). *2022 Global Refugee Work Rights Report*. Center for Global Development. <https://www.cgdev.org/publication/2022-global-refugee-work-rights-report>
- Global Compact on Refugees. (2024, September 18). *Uganda, Co-Convener of the GRF 2023: The Backstory*. <https://globalcompactrefugees.org/news-stories/uganda-co-convener-grf-2023-backstory>
- Government of Kenya. (2020). *Support for Host Community and Refugee Empowerment (SHARE): Kenya's Comprehensive Refugee Response Framework (CRRF)*. <https://refugee.go.ke/sites/default/files/downloads/Kenya-Comprehensive-Refugee-Response-Framework-CRRF.pdf>
- Grześkowiak, M. (2023). When Legal Inclusion is not Enough: the “Uganda Model” of Refugee Protection on the Brink of Failure. *Refugee Survey Quarterly*, 43(1), 95–112. <https://doi.org/10.1093/rsq/hdad022>
- Guyson, N. (2024, April 24). *Uganda Considering Review of Refugee Policy as Less Foreign Aid is Provided*. Development Aid. <https://www.developmentaid.org/news-stream/post/178141/ugandas-refugee-policy>

- Halakhe, A.B., Mukuki, A., & Kitenge, D. (2024, June 3). *The New Refugee Act in Kenya and What it Means for Refugees*. Refugees International. <https://www.refugeesinternational.org/perspectives-and-commentaries/the-new-refugee-act-in-kenya-and-what-it-means-for-refugees/>
- Halakhe, A.B., & Kara, A.Y. (2025, March 13). *Removing Red Tape to Get Kenya's Refugee Act Right*. Refugees International. <https://www.refugeesinternational.org/reports-briefs/removing-red-tape-to-get-kenyas-refugee-act-right/>
- Huduma Kenya. (2025). *Huduma Channels*. Accessed March 27, 2025. <https://www.hudumakenya.go.ke/hudumachannels>
- IMPACT Initiatives. (2022, March). *Evaluation of the Implementation of the Global Compact on Refugees and its Comprehensive Refugee Response Framework (CRRF) in Uganda*. UNHCR Operational Data Portal. <https://data.unhcr.org/en/documents/details/94044>
- Intergovernmental Authority on Development (IGAD). (2024, January 31). *IGAD Policy Framework on Refugee Protection*. <https://igad.int/download/igad-policy-framework-on-refugee-protection/>
- International Labour Organization (ILO). (2023a, July 17). *ILO's Support in East African Summit Yields Commitments for Improved Refugee Inclusion*. <https://www.ilo.org/resource/news/ilos-support-east-african-summit-yields-commitments-improved-refugee>
- International Labour Organization (ILO). (2023b, January 27). *Review of National Policy, Legislative and Regulatory Frameworks and Practice in Uganda*. <https://www.ilo.org/publications/review-national-policy-legislative-and-regulatory-frameworks-and-practice-0>
- International Labour Organization (ILO). (2024a, October 31). *Kenya Extends Haba Haba Savings Scheme to Refugees and Hosts*. <https://www.ilo.org/resource/news/kenya-extends-haba-haba-savings-scheme-refugees-and-hosts>
- International Labour Organization (2024b). *Report on the Assessment of the National Social Security Fund Haba Haba Plan Design and Possibilities for Inclusion of Refugees and Migrant Informal Economy Workers in Kenya*. [https://www.ilo.org/sites/default/files/2024-05/Haba%20Haba%20Report\\_FINAL.pdf](https://www.ilo.org/sites/default/files/2024-05/Haba%20Haba%20Report_FINAL.pdf)
- International Society for Human Rights. (2024, August). *Kenya's Maisha Namba Project: Balancing Digital Innovation with Human Rights Concerns*. Retrieved January 28, 2025. <https://ishr.org/kenya-kenyas-maisha-namba-project/>
- Kalikumutima & Co. Advocates (2024, March 5). *8 Key Changes Brought About by the Markets Act 2023*. <https://kalikumutima.com/8-key-changes-brought-about-by-the-markets-act-2023/>
- Kenya Human Rights Commission. (2020, January 31). *Huduma Namba Stopped!* <https://khrc.or.ke/press-release/huduma-namba-stopped/>
- Kenya News Agency. (2024, September 2). *State Revs Up Maisha Namba Digital ID Awareness Drive*. <https://www.kenyanews.go.ke/state-revs-up-maisha-namba-digital-id-awareness-drive/>

- Kisia, A. (2024). *Bitok: Department of Refugee Services Severely Underfunded*. The Star. <https://www.the-star.co.ke/news/2024-11-27-bitok-department-of-refugee-services-severely-underfunded>
- 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>
- Legal Notice 143 (2023). Kenya Law: National Council for Law Reporting. <https://new.kenyalaw.org/akn/ke/act/ln/2023/143/eng@2023-10-27>
- Loiacono, F., & Silva-Vargas, M. (2019, July). *Improving Access to Labor Markets for Refugees: Evidence from Uganda* (C-43445-UGA-1). International Growth Centre. [https://www.theigc.org/sites/default/files/2019/10/Loiacono-and-Vargas-2019-final-paper\\_revision.pdf](https://www.theigc.org/sites/default/files/2019/10/Loiacono-and-Vargas-2019-final-paper_revision.pdf)
- Millar, S. (2022). *Encamped States: The State of the Camp in Kakuma Refugee Camp and Kalobeyei Integrated Settlement*. [PhD Thesis, Philosophische Fakultät I, Martin-Luther-Universität Halle-Wittenberg, Halle/Saale].
- Ministry of Interior and National Administration (MINA). (2025, March). *Shirika Plan for Refugees and Host Communities*. <https://refugee.go.ke/sites/default/files/2025-04/SHIRIKA%20PLAN%20FOR%20REFUGEES%20AND%20HOST%20COMMUNITIES.pdf>
- Mixed Migration Centre. (2022, July). *4Mi Cities: Data Collection on Urban Mixed Migration—Nairobi City Report*. <https://mixedmigration.org/resource/4mi-cities-data-collection-on-urban-mixed-migration-nairobi-city-report/>
- Nairobi City County. (2017, November). *County Integrated Development Plan (CIDP) 2018–2022, Working Draft*. <https://nairobi.go.ke/download/cidp-county-integrated-development-plan-2018-2022/>
- Nairobi City County. (2023a, December 7). *Building Bridges: Nairobi City County’s Visionary Refugee Integration and Community Building Strategy*. <https://nairobi.go.ke/building-bridges-nairobi-city-countys-visionary-refugee-integration-and-community-building-strategy/>
- Nairobi City County. (2023b, March). *County Integrated Development Plan (CIDP) 2023–2027*. <https://nairobiassembly.go.ke/ncca/wp-content/uploads/paperlaid/2023/NAIROBI-CITY-COUNTY-INTEGRATED-DEVELOPMENT-PLAN-FOR-2023-2027-1.pdf>
- National Planning Authority. (2020, January). *Third National Development Plan (NDP III) 2020/21 – 2024/25*. <https://library.health.go.ug/sites/default/files/resources/Third%20National%20Development%20Plan%20III,%202020-21-2024-25.pdf>
- Native Law Uganda. (2023, August 24). *Uganda’s Market Act 2023: Revolutionizing Vendor Management and Empowering Market Committees*. <https://nalaw.org/2023/08/24/ugandas-market-act-2023-revolutionizing-vendor-management-and-empowering-market-communities/>

- Ninrew, C. (2024, March 4). *Uganda Threatens to Shut Borders to Refugees Over Funding Constraint*. Eye Radio. <https://www.eyeradio.org/uganda-threatens-to-shut-borders-to-refugees-over-funding-constraint/>
- Norwegian Refugee Council. (2018, March). *Refugee Status Determination: A Study of the Process in Uganda*. <https://www.nrc.no/resources/reports/refugee-status-determination>
- Norwegian Refugee Council. (2024a, March). *Legal Protection Needs of Refugees Self-Settled in Secondary Cities in Uganda*. <https://www.nrc.no/resources/reports/legal-protection-needs-of-refugees-self-settled-in-secondary-cities-in-uganda>
- Norwegian Refugee Council. (2024b, March). *NRC Steps Up to Support the Accelerated Refugee Status Determination Exercise in Kampala*. <https://www.nrc.no/globalassets/pdf/briefing-notes/accelerated-refugee-status-determination-kampala/accelerated-refugee-status-determination-kampala.pdf>
- O’Callaghan, S., Manji, F., Holloway, K., & Lowe, C. (2019, September). *The Comprehensive Refugee Response Framework*. ODI Humanitarian Policy Group. <https://media.odi.org/documents/12940.pdf>
- Organization of African Unity (OAU). (1981, June 27). *African Charter on Human and Peoples’ Rights (“Banjul Charter”)*. CAB/LEG/67/3 rev. 5, 21 I.L.M. 58 (1982). <https://www.refworld.org/legal/agreements/oau/1981/en/17306>
- Re:BUiLD. (2022, October). *An Analysis and Evaluation of Refugee-Related Policies and Legislation—Kenya and Uganda*. International Rescue Committee. <https://www.rescue.org/report/analysis-and-evaluation-refugee-related-policies-and-legislation-kenya-and-uganda>
- Re:BUiLD. (2023a, December). *Nairobi and Kampala 2023 Global Refugee Forum Joint Pledges*. International Rescue Committee. <https://rebuild.rescue.org/sites/default/files/2023-12/NAIROBI%20AND%20KAMPALA%20JOINT%20CITY%20PLEDGES%202023.pdf>
- Re:BUiLD. (2023b, December). *Re:BUiLD, KCCA, NCCG at the 2023 Global Refugee Forum in Geneva, Switzerland*. International Rescue Committee. <https://rebuild.rescue.org/press/rebuild-kcca-nccg-2023-global-refugee-forum-geneva-switzerland>
- Refugees Act. (2006). The Uganda Gazette No.47, Volume XCVIX (Act No. 21). *Refworld*. <https://www.refworld.org/legal/legislation/natlegbod/2006/en/102125>
- Refugees Act. (2021). Kenya Gazette Supplement No. 210 (Acts No. 10). [https://kenyalaw.org/kl/fileadmin/pdfdownloads/Acts/2021/TheRefugeesAct\\_No10of2021.pdf](https://kenyalaw.org/kl/fileadmin/pdfdownloads/Acts/2021/TheRefugeesAct_No10of2021.pdf)
- Republic of Uganda. (2023, December). *Global Refugee Forum 2023: Pledges by the Government of Uganda*. Operational Data Portal. <https://data.unhcr.org/en/documents/details/105686>
- Schoemaker, E. (2024, July 31). *Identity and Migration – Research Update #1: Digital ID in Kenya*. Medium. <https://medium.com/caribou-digital/identity-and-migration-digital-id-in-kenya-ac2821f15086>

- Sudan Tribune. (2024, March 22). *Uganda Eases Registration for Elderly, Disabled Sudanese Refugees*. <https://sudantribune.com/article283592/>
- Sultan, R. (2024, June 25). *Uganda's U-turn on Refugee Policy Leaves Sudanese Asylum Seekers Stranded*. openDemocracy. <https://www.opendemocracy.net/en/uganda-refugee-policy-sudan-south-asylum-seekers-stuck/>
- Tubulire & Office of the Prime Minister (OPM). (2024, December 21). *How to Obtain a Refugee Travel Document*. <https://www.tubulire.info/en-us/articles/17942774330013>
- Turkana County Government. (2023, March 2). *Lands CEC, County Assembly Committee on Lands, Physical Planning and Urban Areas Management Meet over the Progress of Proposed Kakuma/Kalobeyi Municipality*. <https://turkana.go.ke/2023/03/02/lands-cec-county-assembly-committee-on-lands-physical-planning-and-urban-areas-management-meet-over-the-progress-of-proposed-kakuma-kalobeyi-municipality/>
- United Nations High Commissioner for Refugees (UNHCR). (2018). *Kalobeyi Integrated Socio-economic Development Plan in Turkana West*. [https://www.unhcr.org/ke/wp-content/uploads/sites/2/2018/12/KISED\\_P\\_Kalobeyi-Integrated-Socio-Econ-Dev-Programme.pdf](https://www.unhcr.org/ke/wp-content/uploads/sites/2/2018/12/KISED_P_Kalobeyi-Integrated-Socio-Econ-Dev-Programme.pdf)
- United Nations High Commissioner for Refugees (UNHCR). (2021, July). *Uganda Employment Policy Brief: Using Socioeconomic Evidence to Promote Solutions for Refugees in Uganda*. <https://www.unhcr.org/sites/default/files/legacy-pdf/61371d364.pdf>
- United Nations High Commissioner for Refugees (UNHCR). (2022, September). *Protection Dashboard: Uganda Refugee Response Plan (RRP) 2022–2023, Quarter 2*. <https://data.unhcr.org/en/documents/details/96143>
- United Nations High Commissioner for Refugees (UNHCR). (2024a, May). *Annual Results Report: 2023 Kenya*. [https://reporting.unhcr.org/sites/default/files/2024-06/EHGL%20-%20Kenya%20ARR%202023\\_0.pdf](https://reporting.unhcr.org/sites/default/files/2024-06/EHGL%20-%20Kenya%20ARR%202023_0.pdf)
- United Nations High Commissioner for Refugees (UNHCR). (2024b, May). *Annual Results Report: 2023 Uganda*. [https://reporting.unhcr.org/sites/default/files/2024-06/EHGL%20-%20Uganda%20ARR%202023\\_0.pdf](https://reporting.unhcr.org/sites/default/files/2024-06/EHGL%20-%20Uganda%20ARR%202023_0.pdf)
- United Nations High Commissioner for Refugees (UNHCR). (2024c, November 8). *External Update #86: Sudan Situation, 27 October–2 November 2024*. Operational Data Portal. <https://data.unhcr.org/en/documents/details/112367>
- United Nations High Commissioner for Refugees (UNHCR). (2024d, November 15). *External Update #87: Sudan Situation, 3-9 November 2024*. Operational Data Portal. <https://data.unhcr.org/en/documents/details/112553>
- United Nations High Commissioner for Refugees (UNHCR). (2024e, April 1). *Kenya: Refugee Status Determination*. Retrieved January 28, 2025. <https://www.unhcr.org/ke/refugee-status-determination>

- United Nations High Commissioner for Refugees (UNHCR). (2024f, December 23). *Uganda Fact Sheet, September-October 2024*. Operational Data Portal. <https://data.unhcr.org/en/documents/details/113390>
- United Nations High Commissioner for Refugees (UNHCR). (2024g, July 29). *Uganda Operational Update: Quarter 1, 2024*. <https://data.unhcr.org/en/documents/details/110194>
- United Nations High Commissioner for Refugees (UNHCR). (2024h, April 6). *Uganda—Sudanese Refugees and Asylum Seekers*. <https://data.unhcr.org/en/documents/details/115559>
- United Nations High Commissioner for Refugees (UNHCR). (2024i, May 17). *Uganda's Open-Door Policy for Refugees Strained by Arrivals from Sudan, DRC, and South Sudan*. <https://www.unhcr.org/us/news/briefing-notes/ugandas-open-door-policy-refugees-strained-arrivals-sudan-drc-and-south-sudan>
- United Nations High Commissioner for Refugees (UNHCR). (2025a). *Total Refugees and Asylum-seekers in Kenya*. Retrieved April 10, 2025. <https://data.unhcr.org/en/country/ken>
- United Nations High Commissioner for Refugees (UNHCR). (2025b). *Total Refugees and Asylum-seekers in Uganda*. Uganda Comprehensive Refugee Response Portal. Retrieved April 2, 2025. <https://data.unhcr.org/en/country/uga>
- United Nations High Commissioner for Refugees (UNHCR). (2025c, April 2). *Uganda—Refugee Statistics March 2025*. Operational Data Portal. <https://data.unhcr.org/en/documents/details/115462>
- United Nations High Commissioner for Refugees (UNHCR). (2025d, April 30). *Update on New Arrivals from the Eastern DRC: 17–23 March 2025*. <https://data.unhcr.org/en/documents/details/115341>
- Urban Areas and Cities (Amendment) Act. (2019). Kenya Gazette Supplement No. 31 (Acts No. 3) [https://kenyalaw.org/kl/fileadmin/pdfdownloads/AmendmentActs/2019/UrbanAreasandCities\\_Amendment\\_Act\\_2019.pdf](https://kenyalaw.org/kl/fileadmin/pdfdownloads/AmendmentActs/2019/UrbanAreasandCities_Amendment_Act_2019.pdf)
- Vuni, F.J., & Iraqi, B. (2023, June 30). *Refugees' Access to Work Permits and Business Licenses in Kenya*. (Refugee-Led Research Series Report No. 7). Refugees Studies Centre. <https://www.rsc.ox.ac.uk/publications/refugees2019-access-to-work-permits-and-business-licences-in-kenya>
- Wambui, M. (2024, April 1). *Refugees or Kenyan Citizens? The Long, Winding Search for National Identity*. The Eastleigh Voice. <https://eastleighvoice.co.ke/national/30070/refugees-or-kenyan-citizens-the-long-winding-search-for-national-identity>
- World Bank. (2024, May 15). *Making Pension Savings Easy and Efficient for Informal Sector Workers— Learning from Kenya's Haba Haba Pilot (English)* <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099051524110034843>