Access to Identity and mobile is key to digital and financial inclusion

A digital identity is increasingly becoming a prerequisite to access a plethora of basic life-enhancing services including healthcare, education, banking and exercising one’s right to vote in a democratic election.

Lack of identification is also a key barrier to accessing basic mobile services – such as voice communications and messaging – in over 150 countries where proof-of-identity is mandatory to register and activate a mobile SIM card (Figure 1). In many developing markets, mobile is already playing a key role in unlocking access to several mobile-enabled services, such as mobile money accounts, Pay-As-You-Go energy, water and sanitation services, educational, health and other digital services. For example, for many of the 866 million registered mobile money accounts, a mobile phone is their main, if not their only, means to receive, send and save money. Yet, in order to open a mobile money account, people need to meet ‘Know Your Customer’ (KYC) requirements, which typically require the presentation of a formal proof-of-identity.

Lack of official identification is disproportionately impacting refugees and other forcibly displaced persons

According to the World Bank, an estimated one billion people around the world lack any legal (state-issued or recognised) identification and are arguably ‘invisible’ in many formal respects (figure 2). About half of these people live in Sub-Saharan Africa and most are likely to be women and/or forcibly displaced e.g. refugees or those affected by humanitarian crises.

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The humanitarian community is increasingly focused on how to ensure those in need of assistance are equipped with acceptable forms of identification, which would allow them to access mobile connectivity and mobile money services in their own name.3

“Most of us don’t have registration forms [for refugee ID], so our SIM cards are registered in friends’ names. We all have proof of residence (POR), but don’t have a refugee ID. You can’t use a POR to register a SIM card. Some of us have a refugee ID from before but it expired after 5 years.” (Male, Refugee, Kiziba refugee camp, Rwanda)

One hundred and seventy three countries are hosts to 19.9 million refugees4. Yet, recent research by the GSMA found that:

- 75 per cent of these countries legally require5 people to present an acceptable form of identification in order to register for a mobile SIM card in their own name.
- Nineteen of the top 20 refugee-hosting countries mandate SIM registration, the United States being the only country that does not (see Figure 3).
- 80 per cent of all refugees live within these 20 countries and so are required to present an acceptable proof of identity to register for a mobile SIM in their own name
- 81 refugee-hosting countries offer mobile money services, which could potentially be available to 54 per cent of all refugees (subject to meeting KYC requirements for opening a mobile money account in their own name).

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4 Under the UNHCR’s mandate (excluding those under UNWRA’s mandate)
5 https://www.gsma.com/mobilefordevelopment/resources/access-mobile-services-proof-identity-global-policy-trends-dependencies-risks/
Twelve of the top 20 refugee hosting countries mandate SIM registration and offer mobile money services. 45 per cent of all refugees live within these 12 countries and could potentially be financially included subject to meeting their host-country’s KYC requirements.

Yet, little evidence exists in the public domain on how many refugees physically possess the identity documentation required for SIM registration and KYC in each host country.

New research\(^6\) was conducted by GSMA and UNHCR\(^7\) in November 2018 to build the evidence base in understanding how refugees access and use mobile technology in specific refugee contexts in Rwanda, Uganda and Jordan, and the associated barriers. The research found that 64% of refugees surveyed in the Kiziba camp in Rwanda have a refugee ID card. In contrast, lack of access to identity documentation is a significant issue for refugees in Bidi Bidi (Uganda) where only 7% reported possessing a Refugee ID\(^8\). Additionally, a lack of clarity about the national policy for SIM registration made it unnecessarily complicated for refugees to get connected. Those who lack recognised proof-of-identity frequently rely on friends and relatives to register a SIM card on their behalf. However, while formal and informal ‘work-arounds’ may exist, the inability to access mobile services in one’s own name could amount to a missed-opportunity for that individual to be meaningfully digitally and financially included.

\(^6\) GSMA research will be published in the second quarter of 2019.

\(^7\) Alongside UNHCR, GSMA conducted research in Jordan (with urban refugees), Rwanda (Kiziba refugee camp) and Uganda (Bidi Bidi refugee settlement) to build an evidence base to understand the ways in which refugees currently access and use mobile technology, and also examine the nuanced barriers.

\(^8\) At the time of data collection in November 2018, a re-verification process was being undertaken, which is likely to account for the low penetration of Refugee IDs.
Many refugees are still unable to register their mobile SIM card in their own name

Figure 4
Proportion of refugees with a mobile SIM card registered in their own name

Sixty-two percent of refugees surveyed in Jordan possess a SIM card registered in their own name. This is a higher percentage than those in Kiziba (48%) and Bidi Bidi (39%). However, in all three contexts, around two thirds of all refugees with a SIM card have it registered in their own name.

“If [the mobile money account] is not in your name, you can’t withdraw your money. You have to find the person who is registered and they have to come and withdraw the money - he may be very far... If it’s not someone you know well they may charge you for that. The challenge is that the owner of the ID may lose their ID and then you can’t use the account and withdraw money. It can take years to replace a lost or expired ID.” (Male, Refugee, FGD 22, Rwanda)

A key policy consideration for host-country governments (in the context of addressing proof of identity barriers faced by refugees) is to understand and reflect what forms of identification most refugees have access to, which could be deemed acceptable for meeting such proof of identity

It is worth bearing in mind that the rate of SIM ownership in each context varies quite dramatically between the three contexts included in the research. In Bidi Bidi 59 per cent of refugees own a SIM, in Kiziba it is 71 per cent and for urban refugees in Jordan it is 90 per cent.
requirements. A report by the UNHCR, supported by the GSMA, looks into the identification requirements that forcibly displaced persons face in the context of accessing mobile services, across 20 host-countries. For example, the research found in Zambia refugees can use their Proof of Registration, Refugee Certificates and Refugee Cards as valid proof of identity to complete SIM registration and mobile money registration. Such interim policies could be put in place until official recognition of a refugee’s status is complete—a process that can take months or years.

**Privacy frameworks can encourage uptake of digital identity and adoption of identity linked mobile services**

As the world’s economies increasingly ‘go digital’, governments carry a responsibility to foster and help create a trusted environment where consumers’ privacy is respected and their privacy expectations are met. Mobile network operators are often subject to a range of laws and/or licence conditions that require them to support law enforcement and security activities in countries where they operate. These requirements vary from country to country and may have an impact on the privacy of mobile customers. The retention and disclosure of data and the interception of communications for law enforcement or security purposes should take place only under a clear legal framework and using the proper process and authorisation specified by that framework. Given the expanding range of communications services, the legal framework should be technology neutral. GSMA research has found that only 61 per cent of the countries mandating prepaid SIM registration have a privacy/data protection framework in place. This is also true for 54 per cent of all African countries (figure 5).

Actual or perceived risks to people’s privacy may adversely affect their willingness to register a SIM card or sign up to identity linked mobile services in their own names.

**Figure 5**
**State of privacy/data protection frameworks in countries mandating SIM registration**

**Role of mobile in facilitating identity enrolment through Public-Private-Partnerships**

The World Bank’s latest global FINDEX survey found that registering for a mobile SIM card is the most prevalent use of identification across all countries surveyed, for both men and women. This also suggests that the willingness to register a SIM card in one’s own name is driving demand for acquiring a digital identity. For such demand to be met, people who currently lack a digital identity need to be able to easily sign up for one. Given the wide reach of mobile network operators (MNOs) through their nationwide retail presence and agent network, governments have an opportunity to partner with
them and leverage their capabilities to enrol millions of hard-to-reach and vulnerable groups of people who currently lack formal identification.

This model is currently being explored in Nigeria and could be particularly effective in other markets such as Somalia, Ethiopia, Swaziland, Zambia and Angola, where it appears there are more people with a unique mobile subscription than an official proof of identity.

Public-Private-Partnerships between MNOs and governments have also been successfully tested in the context of digital birth registration in countries such as Pakistan, Tanzania and Ghana.¹⁶

So what does this mean for policymakers working on their digital transformation strategies?

To improve social, political and economic inclusion, as well as engender trust in the digital ecosystem among underserved populations, an enabling policy and regulatory environment is essential.¹⁰ Elements of such an environment may include:

- Enabling all individuals to access formal identification in a timely manner;
- Coordination between government and sectoral regulators to ensure that the identity ecosystem can cater for the respective needs of each sector (financial, telecoms, health etc.), but also the specific needs of various consumer groups—especially those forcibly displaced or otherwise marginalised;
- Ensuring proof of identity requirements when accessing mobile and digital services are:
  - clear and as harmonised as possible;
  - proportionate to people’s ability to access an acceptable form of identification;
  - reflective of the risk of harm in a given context; and
  - sufficiently flexible to adapt to market developments.
- Fostering trust in mobile and digital identity ecosystems e.g. by establishing or maintaining privacy and data protection frameworks;
- Maintaining robust identification databases and empowering mobile operators to query these when validating customers’ identification credentials at the point of SIM registration (where this is mandatory);
- Partnering with mobile operators, key stakeholders and the wider identification ecosystem to help drive identity enrolment and access to innovative and interoperable solutions; and
- Encouraging adoption and usage of digital identity linked services (e.g. by investing in eGovernment and digital social protection portals for beneficiaries).

With just 11 years to meet the 2030 United Nations’ Sustainable Development Goals (SDGs) and in particular SDG 16.9 of providing ‘legal identity for all’, there is a clear need for concerted action; governments, the development community, the mobile and financial services sectors and stakeholders from the wider identification ecosystem need to do their part to jointly address the proof of identity barriers preventing millions of people from accessing life-enhancing mobile services in their own name.

¹⁰ https://www.gsma.com/mobilefordevelopment/resources/enabling-access-mobile-services-forcibly-displaced/
The GSMA’s Mobile for Humanitarian Innovation Programme is committed to supporting dialogue between these stakeholders in an effort to create more enabling environments where the basic needs of displaced populations can be met.

If you would like to learn more about how we could work together please visit https://www.gsma.com/mobilefordevelopment/mobile-for-humanitarian-innovation/