



UNHCR Innovation Services - Digital Innovation Programme

Displaced and Disconnected

Asia

Malaysia



UNHCR
The UN Refugee Agency

Displaced and Disconnected

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Malaysia

Understanding the legal and regulatory barriers to accessing mobile connectivity and digital financial services faced by refugees and asylum-seekers in Malaysia

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Disclaimer

The views contained herein are attributed exclusively to the researcher and do not reflect the views or position of UNHCR and/or other stakeholders mentioned in the report.

Abbreviations

AML	Anti-Money Laundering
APG	Asia/Pacific Group on Money Laundering
BNM	Bank Negara Malaysia
CDD	Customer Due Diligence
CFT	Combating the Financing of Terrorism
CMN	Cellular Mobile Networks
eKYC	Electronic Know Your Costumer
EMI	Electronic Money Issuer
FSA	Financial Services Act
GSMA	Global System for Mobile Communications Association
FATF	Financial Action Task Force
FIs	Financial Institutions
ITU	International Telecommunications Union
KYC	Know Your Customer
MCMC	Malaysian Communications and Multimedia Commission
MNO	Mobile Network Operators
PDPA	Malaysia Personal Data Protection Act
SIM	Subscriber Identification Module
TFS	Targeted Financial Sanctions
UNHCR	United Nations High Commissioner for Refugees

Malaysia



ITU Regulatory Tracker
Overall Score (2020):¹



GSMA Mobile Money
Regulatory Index (2021):²



Party to the 1951
Refugee Convention:
No



Data Protection and
Privacy Legislation:
Yes

Executive Summary

As a part of the Digital Innovation Programme of UNHCR's Innovation Service, the Displaced and Disconnected research series investigates the legal and regulatory barriers to accessing mobile connectivity and digital financial services faced by asylum-seekers, refugees and stateless persons. This report looks specifically at the legal frameworks, requirements and regular practices of operators and service providers in Malaysia. It reviews the implications of requirements for ID credentials and supporting documentation accessible to displaced persons and the barriers and opportunities this creates for accessing essential digital services and related products.

The position of refugees and asylum-seekers in Malaysia is unique given that Malaysia is not a signatory to the 1951 Refugee Convention nor its 1967 Protocol. Although refugees and asylum-seekers in Malaysia are issued with UNHCR documentation upon registration with UNHCR Malaysia, this documentation is not recognised as valid proof of identity for the purposes of SIM card registration, which is compulsory for all subscribers of a Malaysian prepaid public cellular service since 2006.³ For foreigners in Malaysia, SIM card registration requires presenting a valid passport, work permit, identification card, student identification card, or other documents issued by the National Registration Department, or the Immigration Department of Malaysia. This is stipulated by guidelines issued by the Malaysian Communications and Multimedia Commission (MCMC). Refugees and asylum-seekers therefore have limited access to SIM cards properly registered in their name given the lack of recognition of UNHCR documentation as valid proof of identity, along with the constraints they face in obtaining passports or other types of identity and supplementary documentation.

On the other hand, UNHCR issued documentation is recognised by the Central Bank, Bank Negara Malaysia, as an acceptable identity document for non-Malaysians in lieu of a passport or other forms of identity documents. However, this does not remove all barriers for refugees as opening a bank account often requires presenting supplementary documentation which refugees do not ordinarily have, such as tenancy agreements or proof of employment.

In the event that refugees and asylum-seekers can obtain a mobile number, they can apply for accounts with certain e-wallet providers. However, use of available e-wallets is limited to basic features and low transaction limits. Unlocking further features and increasing the wallet size requires further verification of identity, which is not possible with UNHCR identity documents. The constrained access to registered SIMs places refugees and asylum-seekers at various risks of exploitation or losing services, for example in having to rely on others to transfer money, having accounts not in their names, and being cut off from communication or services if their mobile numbers are deactivated.

¹ 'ICT Regulatory Tracker' <<https://app.gen5.digital/tracker/metrics>>

² The Mobile Money Regulatory Index 2021: Regional and Country Profiles (GSMA, October 2021) <<https://www.gsma.com/mobilefordevelopment/wp-content/uploads/2021/10/Mobile-Money-Regulatory-Index-2021.pdf>> at p.153

³ Prepaid Registration Exercise In Malaysia (2006) Malaysian Communications and Multimedia Commission Notice (2006) <https://www.mcmc.gov.my/skmmgovmy/files/attachments/Info-updated%204July06.pdf>

Operational Context

In 1975, UNHCR began its operations in Malaysia when Vietnamese refugees began to arrive by sea in Malaysia and elsewhere in the region.⁴ Between 1975 to 1996, UNHCR assisted the Malaysian government to resettle more than 240,000 Vietnamese to other countries and has helped more than 9,000 persons to return home to Vietnam.⁵

Malaysia is not a party to the 1951 Refugee Convention nor its 1967 Protocol, and there is currently no legal and policy framework to address the protection and welfare needs of refugees and asylum-seekers. Nonetheless, Malaysia is host to some 186,000 refugees and asylum-seekers based on ‘humanitarian grounds’.⁶

Due to the lack of a legal framework, UNHCR is responsible for the registration, documentation and status determination of refugees and asylum-seekers.⁷ As there are no refugee camps in Malaysia, most refugees reside in urban areas, with the largest numbers residing in Selangor and Kuala Lumpur.⁸ The lack of legal framework has also resulted in a lack of access to legal work and basic services such as affordable healthcare and education.

Registration and Identification of Displaced Persons

As of August 2022, there are 185,920 refugees and asylum-seekers registered by UNHCR in Malaysia.⁹ Some 159,190 refugees and asylum-seekers are from Myanmar, comprising Rohingya (105,710), Chin (23,430) and other ethnic groups (30,050) from conflict-affected areas or fleeing persecution in Myanmar.¹⁰ The remaining individuals consist of 26,720 refugees and asylum-seekers from 50 countries fleeing war and persecution, including Pakistanis (6,840), Yemenis (3,830), Syrians (3,400), Somalis (3,220), Afghans (3,270), Sri Lankans (1,570), Iraqis (1,200), Palestinians (780) and others.¹¹

The lack of legal framework creates challenges around the legal status and access to services of refugees and asylum-seekers. The term ‘refugee’ is not defined under the Immigration Act 1959/63 (Act 155) and the status of a refugee is not legally recognised by the Malaysian government. Refugees and asylum-seekers are considered “illegal immigrants” in Malaysia. As such, they are not provided with any special formal protection and, like undocumented migrants, are subject to the Immigration Act. This means they are susceptible to being removed, arrested, or detained for unlawfully entering and remaining in Malaysia.¹²

4 ‘UNHCR Representation in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/unhcr-in-malaysia.html>>

5 ‘UNHCR Representation in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/unhcr-in-malaysia.html>>

6 ‘Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/malaysia.html>>

7 ‘Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/malaysia.html>>

8 ‘Figures at a Glance in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/figures-at-a-glance-in-malaysia.html>>

9 ‘Figures at a Glance in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/figures-at-a-glance-in-malaysia.html>>

10 ‘Figures at a Glance in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/figures-at-a-glance-in-malaysia.html>>

11 ‘Figures at a Glance in Malaysia’ (UNHCR.org) <<https://www.unhcr.org/en-my/figures-at-a-glance-in-malaysia.html>> August 2022

12 Section 32, 33, 34 and 35 of the Immigration Act 1959/63

Although refugees and asylum-seekers who register with UNHCR Malaysia are issued with UNHCR identity documents, this documentation only serves one purpose – to recognise a refugee and asylum-seeker’s need for international protection.¹³ The UNHCR card does not provide immunity to refugees or asylum-seekers from arrest, does not provide legal stay in the country or count as a valid form of identification for different purposes.

SIM Registration

SIM registration is mandatory in Malaysia as outlined in the Guidelines on Prepaid Registration (MCMC/G/06/06)¹⁴ where a Service Provider who provides prepaid public cellular services is required to register their End-users.¹⁵ An End-user is a person who uses the prepaid cellular service.¹⁶

On 1st June 2017, the Malaysian Communications and Multimedia Commission (“MCMC”)¹⁷ implemented new Guidelines for Registration of End-Users of Prepaid Public Cellular Services (MCMC/G/01/17)¹⁸ which requires a Service Provider to register its End-users, regardless of their nationality if they are subscribers of a Malaysian public prepaid cellular service. This includes Malaysian citizens, permanent residents, foreigners (workers or students) and tourists.¹⁹

For the purposes of registration, all users must provide their full name, permanent or mailing address, identification card number or passport number. Additionally, foreigners also need to show a valid work permit with a company name and address or student identification card (if applicable), along with a mailing address and a valid passport.²⁰ Other information may also be requested by MCMC. In addition, both Malaysians and foreigners are required to show proof of an original utility bill within the last one month for the purposes of verifying their mailing address.²¹ Registrations must be done using a secure platform such as Optical Character Recognition application, Biometrics or MyKad Reader. These platforms are provided by the Service Providers via their website or mobile apps which allow their end-users to scan and upload a copy of their identification card or passport to register their SIM card.²² In addition, each user can only register for up to 5 prepaid SIM cards per Service Provider.²³

13 ‘Registering with UNHCR’ (UNHCR.org) <<https://refugeemalaysia.org/support/registering-with-unhcr/>>

14 Guidelines on Prepaid Registration (MCMC/G/06/06) (MCMC, 5 June 2006) (“2006 Guidelines”) <<https://www.mcmc.gov.my/skmmgovmy/files/attachments/Prepaid%20Registration%20Guideline.pdf>>

15 2006 Guidelines, para 2.1

16 2006 Guidelines, glossary at p. 2

17 The Communications and Multimedia Act 1998 (“CMA”) together with its subsidiary legislation, the Malaysian Communications and Multimedia Commission (“MCMC”) regulates all telecommunications networks in Malaysia.

18 ‘Guidelines on Registration of End-Users of Prepaid Public Cellular Services (MCMC/G/01/17)’ (MCMC, 1 June 2017) (“2017 Guidelines”) <https://www.skmm.gov.my/skmmgovmy/media/General/pdf/Prepaid-Registration-Guidelines-MCMCG0117_1.pdf>

19 2017 Guidelines, at para 3.1; ‘Who needs to register?’ (MCMC.gov.my) <https://www.mcmc.gov.my/en/faqs/prepaid-registration/who-needs-to-register>

20 2017 Guidelines, para 3.2 (b)

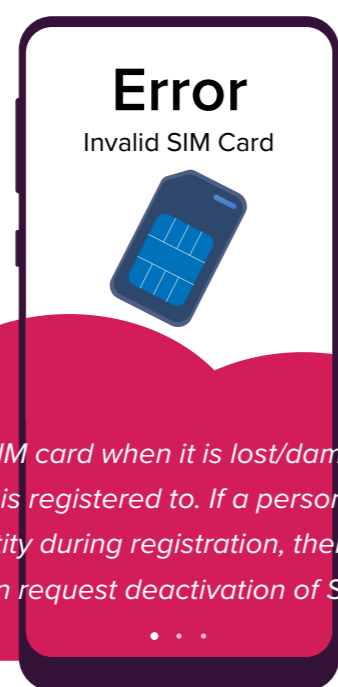
21 2017 Guidelines, para 3.4

22 See Service Providers such as UMobile <<https://www.u.com.my/en/personal/support/self-help/prepaid-self-registration>> and Tune Talk <<https://www.tunetalk.com/my/en/selfreg>>

23 2017 Guidelines, para 4.1

The UNHCR card is not accepted as a valid proof of identification document for the purposes of registering a SIM card in Malaysia.²⁴ Most refugees and asylum-seekers in Malaysia do not hold a valid passport and have inconsistent living arrangements where they do not have a permanent address or utility bills in their name. As such, their legal access to SIM cards is limited due to the lack of access to the required forms of identification and documentation for verification purposes.

Refugees are sometimes able to obtain SIM cards by purchasing temporary or travellers' SIMs that are only valid for short durations (14 to 90 days), or have SIMs registered in other people's names. In Malaysia, one user can register up to 5 SIMs and therefore sometimes refugees and asylum-seekers rely on having SIMs under a different person's credentials. Even when refugees and asylum-seekers obtain a SIM, having it registered under a different person's name still causes issues. For example, it is difficult to replace a SIM card when it is lost/damaged or change a pre-paid plan without the person it is registered to. If a person is blacklisted due to suspected misuse of identity during registration, their associated SIM cards are blocked, or the person can request deactivation of SIMs registered to them.



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From anecdotal accounts, registration under a different person's name appears to be becoming more difficult as registration now must happen in person to verify the person's identity. It is reported that there has been an increase in the review by authorities of registered accounts to reduce potentially illegal registrations. During these reviews, dubious accounts are deactivated and those involved can face fines. This can further constrain the already limited access to SIM cards for refugees and asylum-seekers and increase their vulnerability to exploitation.

²⁴ 'What are the documents required for Prepaid SIM card registration' (MCMC.gov.my) <<https://www.mcmc.gov.my/en/faqs/prepaid-registration/what-type-of-documents-can-be-used-for-the-registr>>

Know Your Customer and Customer Due Diligence Rules

The financial sector in Malaysia is regulated by Bank Negara Malaysia (BNM). In June 2020, the BNM published a policy document regarding the guidelines for Electronic Know-Your-Customer (e-KYC) practices.²⁵ The document sets out the minimum requirements and standards that financial institutions must observe in the implementation of e-KYC for the identification and verification of individuals. The e-KYC policy is linked to the Anti-Money Laundering, Counter Financing of Terrorism and Targeted Financial Sanctions for Financial Institutions (AML/CFT and TFS for FIs) document of 1 January 2020 whose provisions must also be observed. The e-KYC policies are applicable when opening any kind of bank account electronically and does not mean they only apply for e-wallet or other mobile money accounts.

A financial institution²⁶ must ensure that appropriate measures for the identification and verification of a customer's identity through e-KYC are secure and effective.²⁷ In doing so, a financial institution should be able to verify three basic authentication factors during the digital onboarding of registering a bank account:

- I. something the customer possess (identity card, registered mobile number);
- II. something the customer knows (pin, personal information); and
- III. something the customer is (biometric characteristics).²⁸

When identifying a customer's identity through e-KYC, a financial institution may undertake measures including verifying the customer against a government-issued ID by utilising biometric technology, ensuring the government-issued ID is authentic by utilising appropriate fraud detection mechanisms; and/or ensuring the customer is a live subject and not an impersonator by utilising liveness detection.²⁹

In September 2020, BNM issued an updated Guidance on Verification on Individual Customers for Customer Due Diligence³⁰ which recognises "a document, letter, or statement from the United Nations or its agencies (for example a United Nations High Commissioner for Refugees card)" as valid proof of identity for financial verification purposes. This means that refugees and asylum-seekers registered with UNHCR would be eligible to open a bank account under these verification rules. This document however is only guidance on recommended practices, and it is not mandatory for banks to follow it. Banks reserve the right to accept or reject a UN issued document at their discretion and based on their risk evaluation and other analyses. If the UNHCR documentation is accepted, the bank accounts available to refugees and asylum-seekers are limited to basic savings accounts for salary remittance and limited transactions, but not loans and other financial products.

²⁵ 'Electronic Know-Your-Customer (e-KYC) (BNM/RH/PD 030-10)' (BNM, 30 June 2020) ("e-KYC guidelines") <<https://www.bnm.gov.my/documents/20124/948107/e-KYC+Policy+Document+300620.pdf/af752210-02e5-d2a4-e2ee-04b00c731a91?t=1594085248675>>

²⁶ The e-KYC policy document must be read together with the Anti-Money Laundering, Counter Financing of Terrorism and Targeted Financial Sanctions for Financial Institutions (AML/CFT and TFS for FIs) dated 1 January 2020.

²⁷ A financial institution is a licensed bank, investment bank and life insurer under the FSA, a licensed Islamic bank and licensed family takaful operator under the IFSA, a prescribed development financial institution under the DFIA, an approved non-bank issuer of designated payment instruments under the FSA, an approved non-bank issuer of designated Islamic payment instruments under the IFSA, a licensed money-changing operator and/or a licensed remittance service provider under the MSBA.

²⁸ e-KYC guidelines, para 7.5. See 'Digital on-boarding policy to enable account opening anytime, anywhere' (BNM, 30 June 2020) <<https://www.bnm.gov.my/-/digital-on-boarding-policy-to-enable-account-opening-anytime-anywhere>>

²⁹ e-KYC guidelines, para 7.6

³⁰ 'Guidance on Verification of Individual Customers for Customer Due Diligence' (BNM, 1 September 2020) <https://www.bnm.gov.my/documents/20124/914558/Guidance+on+Verification_01092020.pdf> para 5.6

The access of refugees and asylum-seekers to financial services, particularly those with more comprehensive features, is still limited due to the legal requirements of providing proof of identity documentation plus additional documentation that market practices require. Banks often require presenting supplementary documentation and meeting minimum thresholds to open an account; for example, income statements, passports, tenancy agreements, work permits and/or proof of employment such as employer support letters or contracts. Some banks also only accept a certain type of UNHCR identity document, for example UNHCR identity cards but not asylum-seeker certificates. The requirements and thresholds can vary across banks, and each individual branch can ultimately decide whether a customer is eligible or not. This is particularly relevant for refugees and asylum-seekers from countries listed by the Financial Action Task Force (FATF) as high-risk as banks consider the country of origin in their risk analysis or need to undertake enhanced due diligence³¹

Refugees and asylum-seekers do not currently have legal access to work in Malaysia and therefore cannot easily obtain required documentation from their landlords or employers if they are engaged in the informal economy. Employers may be unwilling to issue support letters due to the risks it implies for them, while each bank can also decide if such a letter is acceptable.³²

Beyond access to conventional bank accounts, the possession of identification and supporting documents can also facilitate individuals' access to non-bank financial service providers who can issue prepaid Visa/Mastercard cards or mobile money providers, as noted below. These however are still limited financial services that do not provide the same benefits as full accounts and are subject to lower maximum value thresholds. The thresholds are even lower for asylum-seekers who do not have UNHCR-issued ID cards.

Remittances

Anecdotal evidence suggests that remittances are an important part of the economy in displaced communities. Individuals send or receive money through informal agents or Western Union when possible. Refugees' limited access to financial services means that they often rely on friends or other individuals with valid passports or accounts to make the transfers for them. This reliance on informal agents or other individuals means that the transfers are not always secure, and funds may not reach the intended recipient, which can lead to exploitation. Increasing the access of refugees and asylum-seekers to financial services can help mitigate these risks, give them more control of their funds, and reduce transactions going through unregulated channels.

31 'Statements on High-Risk and Other Monitored Jurisdictions by the Financial Action Task Force (FATF) by the Central Bank of Malaysia (2022) https://amlcft.bnm.gov.my/documents/6312201/6321216/Notice_FATF_Public_Statement_June_2022.pdf

32 'Economic Inclusion for refugees' (January 2022, UNHCR)

Mobile Money

Mobile money, also known as "e-money",³³ is governed by the Financial Services Act 2013 (FSA) and is defined in the Payment Systems (Designated Payment Instruments) Order 2003 as a payment instrument which stores funds electronically and can be used to make payments to any person other than the issuer of e-money (EMI). In 2008, BNM issued a Guideline on Electronic Money³⁴ which defines the requirements and minimum standards for the operation of EMIs' services.³⁵ There has been a growing interest in the use of mobile money in Malaysia with 33% of the total electronic payments representing mobile money, and a 131% increase in e-wallet transactions from RM0.3 billion in 2019 to RM0.6 billion in 2020.³⁶ Currently, there are a total of 6 bank and 48 non-bank EMIs who are registered with BNM in Malaysia.³⁷



On 11th June 2021, BNM published an exposure draft of a policy document for electronic money which sets out the bank's proposed regulatory requirements and guidance for approved EMIs and future applicants pursuant to section 11 of the FSA and Islamic Financial Services Act 2013.³⁸ Under the exposure draft, EMIs are required to use multi-factor authentication when authenticating online payments to mitigate the risk of fraudulent online transactions.³⁹ This includes using the same 3 basic authentication methods required by a financial institution for opening a bank account, such as providing a valid identity card or registered mobile number.⁴⁰ The use of the 3 authentication methods without alternatives will continue to present refugees and asylum-seekers with the same access challenges to financial services and transactions that are already being experienced for opening accounts.

33 E-money can be issued by EMI in two forms, card-based prepaid cards or network-based mobile application.

34 Guideline on Electronic Money (E-Money) (BNM/RH/GL 016-3) ("E-Money Guidelines") <www.bnm.gov.my/documents/20214/57659/gl_016_3.pdf>, para 5.1.1

35 E-Money Guidelines, para 1.1

36 3 "Electronic Money (E-Money) Exposure Draft" (Bank Negara Malaysia, 11 June 2021) ("E-Money Exposure Draft") <www.bnm.gov.my/documents/20124/943361/ED_emoney.pdf> para 1.3

37 'List of Non-bank E-money issuers' (bnm.gov.my) <www.bnm.gov.my/non-bank-e-money-issuers>

38 'List of Non-bank E-money issuers' (bnm.gov.my) <www.bnm.gov.my/non-bank-e-money-issuers>

39 E-Money Exposure Draft, para 19.6

40 Based on the three (3) basic authentication factors, (i) something the user knows (e.g. PIN, personal information), (ii) something the user possesses (e.g. identity card, registered mobile number) and (iii) something the user is (e.g. biometric characteristics).

If they have obtained a registered mobile number, it may be possible for refugees and asylum-seekers to open some types of e-wallet accounts, but these provide limited access to more comprehensive financial services. The high appetite for such financial services from the displaced community is reflected in findings from an internal mapping exercise performed by UNHCR, which revealed that around 17,000 UNHCR-registered individuals held accounts with a non-bank financial service provider. Basic accounts only have some features of e-wallets and are subject to a daily limit or a maximum top-up amount, limiting their functions as a savings mechanism, among others.⁴¹ The introduction of multi-factor authentication that only accepts documentation that few refugees have access to will also restrict their ability to make mobile money transactions. Under the current tiered system of verification for accounts, refugees and asylum-seekers in Malaysia are unlikely to be able to upgrade these basic e-wallet accounts and enjoy more comprehensive services as they would need to have a valid passport and other documentation mentioned above to satisfy e-KYC requirements for e-wallets.

Personal Data Protection

Malaysia has a comprehensive data protection legal framework in place, with the Data Protection Act 2010 (PDPA) regulating the processing of personal data in commercial transactions. All information obtained by the Service Provider for the purpose of prepaid SIM registration shall not be used for marketing or any other activities, and the handling of the said information must be fully compliant with the requirements of the PDPA.⁴² In February 2020, the Malaysian government issued a Public Consultation Paper on the review of PDPA. The Malaysian government is in the process of amending the act, however, no exposure draft of the amendment bill has made public to date. It will be important to understand the implications of the new regulation in terms of the rights of refugees and asylum-seekers to the protection of their data should they register with MNOs and Financial Service Providers for any services.

⁴¹ As of the date of our report, for example, foreigners can register for a Touch 'n Go and Boost wallet using a registered mobile number, while they can open a Grab wallet and Shopee Pay account using their passport. However, they only have access to the basic features of the e-wallets, such as having a wallet limit of RM 200 for Touch 'n Go, daily limit of RM 500 for Grab wallet, maximum top-up amount of RM1000 for Boost.

⁴² 2017 Guidelines, para 3.12

Recommendations

For Humanitarian Organisations

1. Advocate with government stakeholders and regulators/ service providers for the recognition of UNHCR identity documents for the opening of bank accounts and registration of SIM cards;
2. Sensitize refugees and asylum-seekers about their eligibility to open bank accounts under current legislation and where to seek help if banks require further documentation;
3. Advocate with financial service providers and the banking sector to broaden the types of documentation accepted for opening accounts to include documentation that refugees and asylum-seekers have access to.

For Regulators

1. In the interest of promoting financial inclusion, recognize UNHCR identity documents and include them in guideline documents issued to financial and digital services providers on registration and KYC requirements, acknowledging that most refugees and asylum-seekers in Malaysia do not possess identity documents issued from their home country due to the circumstances of their flight;
2. Broaden the range of accepted authentication factors to enable greater access to multi-factor authentication for refugees and asylum-seekers;
3. Work with UNHCR to identify remaining concerns or mitigation measures to enable the recognition of UNHCR documents as part of the strategy to combat dubious registration of SIM cards, allowing for better regulation and safer access to connectivity and communications for refugees and asylum-seekers.

For Financial and Communication Service Providers

1. Engage UNHCR to assess opportunities, risks and mitigation strategies for enabling the financial inclusion of refugees and asylum-seekers as an untapped customer base;
2. Increase the daily limit and maximum top-up amounts and other higher tier services for e-wallet accounts that accept UNHCR identity documents for verification purposes as permitted by regulators;
3. Offer a greater range of financial products and services to refugees and asylum-seekers.



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