



SUB-SAHARAN AFRICA

Mapping the Regulatory Landscape for Financial Inclusion of Refugees and Asylum-seekers

A GLOBAL COMPARATIVE ANALYSIS

June 2026

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Introduction

This regional report forms part of a global comparative analysis of regulatory environments shaping access to financial and digital services for refugees and asylum-seekers. Building on a common analytical framework applied across five regions, it examines how national laws, regulations, and regulatory practices affect the ability of forcibly displaced populations to open bank accounts, register SIM cards, and access mobile money and digital payment services.

To support a consistent and legally grounded assessment across regions, UNHCR partnered with DLA Piper International to examine legal and regulatory frameworks affecting access to financial services for refugees and asylum-seekers across 79 countries in Sub-Saharan Africa, the Americas, Europe, the Middle East and North Africa (MENA), and Asia.

The findings aim to support policymakers, regulators, financial institutions, mobile network operators, and humanitarian and development actors by highlighting where legal foundations for financial inclusion already exist, where implementation gaps persist, and how existing good practices can be strengthened and replicated.

To support accessibility and use of the data, UNHCR has developed an online interactive map showcasing the report's findings, available [here](#).



Methodological Note

This study assesses regulatory frameworks relevant to the financial inclusion of refugees and asylum-seekers, focusing on four key areas: access to bank accounts, SIM card registration, mobile money accounts, and digital wallets or electronic payment accounts, as defined in the figure below.

Category	Description
Bank Accounts	Accounts provided by licensed financial institutions, including basic, savings, and current accounts.
SIM Card Registration	Ability to obtain and register a SIM card with a mobile network operator.
Mobile Money Accounts	Mobile-based electronic value accounts that enable users to store, send, and receive money and make payments using a mobile phone. Mobile money services may be delivered under telecom-led, bank-led, or other branchless financial service models, depending on the regulatory framework.
Digital Wallets / Electronic Payment Accounts	Bank- or fintech-issued digital accounts enabling electronic payments, transfers, and storage of funds via apps or online platforms.

The analysis categorises national regulatory environments as enabling, mixed, or to be developed, based on the extent to which refugees and asylum-seekers are able—under applicable laws, regulations, and regulatory practice—to open bank accounts, register SIM cards, and access mobile money or digital wallets and electronic payment accounts.

An *enabling* environment refers to contexts in which access to financial and digital services is legally permitted and generally functional in practice for refugees and/or asylum-seekers, with no major legal, regulatory, or documentation barriers. A *mixed* environment refers to contexts in which access to these services is legally permitted but constrained by important practical barriers, including documentation requirements, regulatory discretion, inconsistent implementation, or provider-level practices that limit effective access. An environment *to be developed* refers to contexts in which access is not legally permitted or is effectively excluded in practice, such that most refugees and asylum-seekers are unable to access basic financial or digital services.

The findings draw on country-specific legal questionnaires completed by DLA Piper's corporate clients, including Amazon, BNP Paribas, Santander, Airbus, and Fundación Telefónica. The questionnaires were based on applicable legislation, regulations, supervisory guidance, and



other publicly available sources. These questionnaires were reviewed and validated by UNHCR country-level focal points, who provided contextual insights on regulatory implementation and practical access constraints.

Data collection began in January 2025 and was conducted in phases, with questionnaires administered across countries at different points throughout the year. Given the time elapsed between the initial data collection and the subsequent validation and finalisation of the report, some countries experienced changes in legislation or practice; updates flagged by UNHCR country operations were therefore incorporated to ensure the report reflects the most up-to-date situation.

Refugee figures referenced in this report are drawn from UNHCR's *2025 Mid-Year Trends Report*. The most recent statistics can be accessed through [UNHCR's Refugee Data Finder](#), while additional country-level information on displacement situations is available on [UNHCR's website](#).

While the methodology applies a common analytical framework across all countries, the classification necessarily reflects professional legal interpretation and assesses both formal legal provisions and their likely effects in practice. As a result, classifications should be understood as indicative of overall regulatory environments, rather than as definitive assessments of individual service providers' practices or of access for all individuals in all locations.

As the country analyses were prepared by different national legal experts, the level of detail in individual sections may vary to reflect differences in legal complexity, data availability, and expert emphasis; these variations do not affect the overall comparability of the findings.

Regional Overview

Based on UNHCR 2025 figures, Sub-Saharan Africa hosts approximately **39.1 million forcibly displaced and stateless persons**, accounting for one third of the global displaced population. The majority—around 24.3 million—are Internally Displaced Persons (IDPs), alongside approximately **8.4 million refugees and around 650,000 asylum-seekers**, in addition to other forcibly displaced and stateless populations.

The region has made notable progress in developing regulatory frameworks that promote financial inclusion but continues to exhibit wide variation in the extent to which these frameworks enable access for refugees and asylum-seekers in practice.

Across the region, recognised refugees generally face fewer legal barriers than asylum-seekers, particularly in contexts where governments issue refugee identity documents that are formally recognised for Know Your Customer (KYC) purposes. In several countries, refugees are, in principle, legally entitled to open bank accounts, register SIM cards, and access mobile money and other digital financial services. By contrast, asylum-seekers are frequently excluded due to the non-recognition of temporary or procedural documentation issued during refugee status determination processes, even where no explicit legal prohibitions exist. This distinction between recognised refugee status and pending asylum status is a defining structural feature of financial exclusion across Sub-Saharan Africa.

Documentation and identity verification requirements constitute the principal barriers to financial inclusion in the region. Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) and KYC regimes typically require officially recognised identity documents, proof of address, and—in some cases—proof of income or residence permits. While refugee identity cards are often recognised under national law, their acceptance in practice remains uneven and depends heavily on provider awareness, internal risk policies, and the availability of interoperable identity systems. For asylum-seekers, the challenge is more acute: temporary certificates, attestations, or UNHCR-issued documentation are frequently not recognised for KYC purposes, resulting in de facto exclusion from banking, SIM card registration, mobile money, and digital wallet services.

At the same time, Sub-Saharan Africa stands out globally for the central role of mobile money in financial inclusion. In many countries, mobile money services—often delivered through telecom-led models—are more accessible and widely used than traditional bank accounts, both for host communities and displaced populations. In some contexts, mobile money serves as a critical entry point to the formal financial system, supporting everyday transactions, remittances, savings, and the delivery of humanitarian cash assistance.

Where refugees are able to register SIM cards in their own names, access to mobile money is often significantly higher than access to banking services, even where legal frameworks remain imperfect.

SIM card registration therefore functions as a critical gateway to both connectivity and financial inclusion. Mandatory SIM registration regimes—now widespread across the region—link access to mobile services directly to identity verification systems. In countries where refugee identity documents are formally recognised and consistently accepted, SIM registration has facilitated broader access to mobile money and digital services. Conversely, where refugee IDs are not yet issued at scale, inconsistently accepted, or not recognised by telecommunications authorities, even recognised refugees face significant constraints. For asylum-seekers, the inability to register SIM cards remains one of the most pervasive and exclusionary barriers across the region.

Recent years have nonetheless seen important policy and regulatory progress. Several countries have introduced or updated National Financial Inclusion Strategies that explicitly identify refugees as underserved or priority populations. In a growing number of contexts, regulatory authorities and central banks have issued guidance recognising refugee documentation for KYC purposes or enabling simplified due diligence for low-risk accounts. Emerging digital identification systems also hold potential to reduce longstanding implementation gaps by standardising identity verification and improving interoperability across banks, mobile network operators, and fintech providers.

Despite these advances, implementation gaps remain substantial. Acceptance of refugee documentation often varies across institutions and geographic locations, frontline staff frequently lack familiarity with applicable regulations, and IT systems are not always configured to recognise non-national identity documents. Additional structural constraints—such as limited financial and digital literacy, low smartphone ownership, infrastructure gaps in remote settlements, poverty, and restricted access to employment—continue to limit not only access to financial services, but also meaningful and sustained usage.

Overall, financial inclusion in Sub-Saharan Africa is characterised by relative legal openness for recognised refugees, systematic exclusion of asylum-seekers, and a strong reliance on mobile money as the primary channel for financial access. Progress depends on the availability of recognised refugee identity documents, their consistent acceptance by financial institutions and mobile network operators, and the degree to which identity systems, financial regulation, and digital infrastructure are effectively aligned in practice. Advancing financial inclusion across the region will therefore require coordinated regulatory, institutional, and infrastructure efforts to ensure that access is not only legally permitted but also practically achievable for both refugees and asylum-seekers.

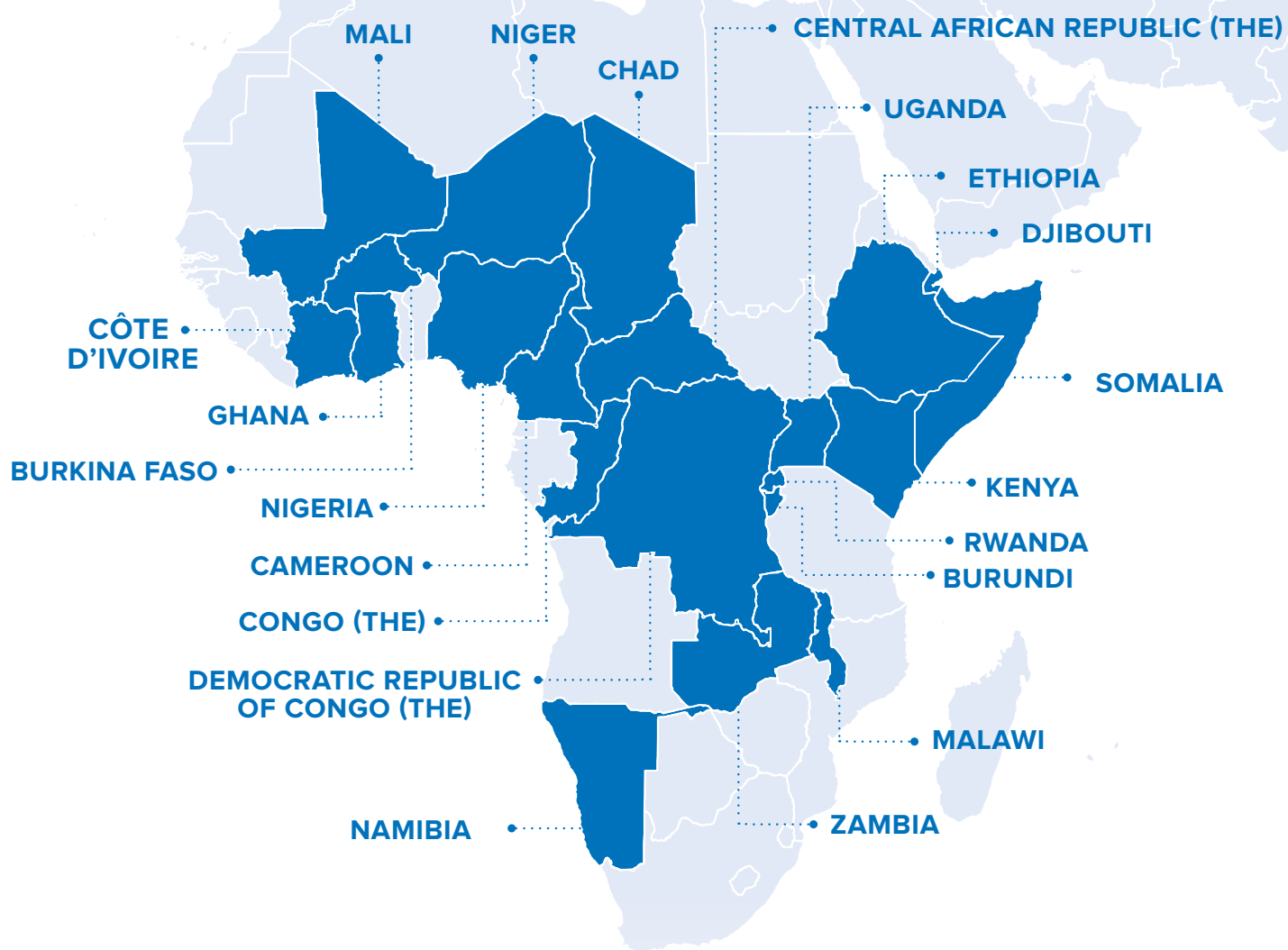


TABLE 1: Financial Inclusion Regulatory Environment for Refugees and Asylum-seekers in Sub-Saharan Africa, by Status

Country	Status	Number* (June 2025)	Bank Ac- counts	SIM Card Regis- tration	Mobile Mon- ey Accounts	Digital Wal- lets/ Electron- ic Payments
Burkina Faso	Refugees	40,301	●	●	●	●
	Asylum-seekers	1,458	●	●	●	●
Burundi	Refugees	104,253	●	●	●	●
	Asylum-seekers	1,709	●	●	●	●
Cameroon	Refugees	412,118	●	●	●	●
	Asylum-seekers	19,160	●	●	●	●
Central African Republic (the)	Refugees	54,376	●	●	●	●
	Asylum-seekers	8,326	●	●	●	●
Chad	Refugees	1,430,067	●	●	●	-
	Asylum-seekers	8,791	●	●	●	-
Congo (the)	Refugees	62,471	●	●	●	●
	Asylum-seekers	7,867	●	●	●	●
Côte d'Ivoire	Refugees	2,384	●	●	●	●
	Asylum-seekers	70,567	●	●	●	●
Democratic Republic of Congo (the)	Refugees	515,083	●	●	●	●
	Asylum-seekers	1,546	●	●	●	●
Djibouti	Refugees	24,576	●	●	●	●
	Asylum-seekers	9,154	●	●	●	●
Ethiopia	Refugees	1,015,145	●	●	●	●
	Asylum-seekers	64,674	●	●	●	●
Ghana	Refugees	18,351	●	●	●	●
	Asylum-seekers	549	●	●	●	●
Kenya	Refugees	626,546	●	●	●	●
	Asylum-seekers	228,305	●	●	●	●

Country	Status	Number* (June 2025)	Bank Accounts	SIM Card Registration	Mobile Money Accounts	Digital Wallets/ Electronic Payments
Malawi	Refugees	35,228	●	●	●	●
	Asylum-seekers	23,391	●	●	●	●
Mali	Refugees	138,530	●	●	●	●
	Asylum-seekers	296	●	●	●	●
Namibia	Refugees	5,334	●	●	●	●
	Asylum-seekers	1,277	●	●	●	●
Niger (the)	Refugees	391,862	●	●	●	●
	Asylum-seekers	41,695	●	●	●	●
Nigeria	Refugees	123,923	●	●	●	●
	Asylum-seekers	15,115	●	●	●	●
Rwanda	Refugees	115,244	●	●	●	-
	Asylum-seekers	15,020	●	●	●	-
Somalia	Refugees	20,005	●	●	●	●
	Asylum-seekers	24,557	●	●	●	●
Uganda	Refugees	1,887,594	●	●	●	●
	Asylum-seekers	39,990	●	●	●	●
Zambia	Refugees	82,007	●	●	●	●
	Asylum-seekers	11,157	●	●	●	●
* Source: UNHCR 2025 Mid-Year Trends Report						

Classification key (used throughout this report):

● Enabling	● Mixed	● To be developed
Legally permitted and generally functional in practice	Legally permitted, but important practical or documentation constraints	Not legally permitted or effectively excluded

BURKINA FASO



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

40,301 / 1,458 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

274 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

Burkina Faso is a State party to the 1951 Convention, its 1967 Protocol, and the 1969 OAU Convention Governing the Specific Aspects of Refugee Problems in Africa. Refugees are issued refugee identity cards and refugee attestations by the National Commission for Refugees (CONAREF) and may also apply for a Machine Readable Convention Travel Document (MRCTD). Asylum-seekers are issued a temporary certificate (*Acquis de droit*), which is not formally recognised as a valid identity document.

Refugees may use their identity cards and attestations as legal identification to access financial and mobile services; however, refugee attestations alone are often insufficient to meet KYC requirements. Asylum-seekers face even greater barriers, as the *Acquis de droit* is generally not accepted for KYC purposes, significantly limiting access to these services unless a valid passport is held.



Financial and Digital Access for Refugees and Asylum-seekers in Burkina Faso

Category	Refugees	Asylum-seekers
Opening Bank Accounts	Refugees are legally entitled to open basic bank accounts. In practice, however, refugee attestations alone are often not accepted by banks, and additional documentation (e.g. proof of address or income) may be difficult to obtain.	Temporary certificates are not accepted for KYC purposes. Additional documentation requirements cannot generally be met, limiting access to bank accounts.
Registering SIM Cards	No legal barriers.	Temporary certificates are not accepted by mobile network operators. A valid passport is generally required to register a SIM card.
Opening Mobile Money Accounts	No legal barriers.	Access is constrained by the same documentation barriers affecting SIM registration and bank account opening.
Opening Digital Wallets / Electronic Payment Accounts	No legal barriers. Refugee documentation is, in principle, accepted by providers; however, most digital wallets are linked to bank accounts, and refugee attestations are not always recognised for KYC purposes.	Access is constrained by the same documentation barriers affecting SIM registration and bank account opening.



Opening Bank Accounts

Banking activities in Burkina Faso are governed by Law No. 0582008/AN (2008), with regulatory oversight provided by the Central Bank of West African States (BCEAO), which also plays a central role in enforcing AML/CFT regulations. Decentralised Financial Systems (DFS) are regulated under Law No. 0162012/AN (2012) and fall under the supervision of the Ministry of Economy and Finance, with technical and regulatory support from the BCEAO, in line with the harmonised West African Economic and Monetary Union (UEMOA) framework.

While Burkina Faso does not explicitly restrict refugees or asylum-seekers from opening bank accounts, both groups face significant practical barriers. Documentation requirements pose particular challenges for asylum-seekers, as their temporary certificates are not recognised as valid identification for KYC purposes.

Refugees are legally eligible to open basic bank accounts, which provide access to essential services such as deposits, withdrawals, and domestic transfers. In practice, financial institutions typically require a valid passport or refugee identity card, proof of address (e.g. utility bills, rental agreements, or shelter registration), and evidence of the source of funds. Access to more advanced financial services—including credit—remains limited, as these products require stricter eligibility criteria, additional documentation, and proof of a credit or transaction history.

Refugee identity cards (CIR) are generally accepted by financial institutions; however, issuance is centralised in Ouagadougou through the National Office for Identification (ONI), with distribution limited to areas where the National Commission for Refugees (CONAREF) is present. UNHCR supports periodic CIR issuance campaigns in other refugee-hosting regions, but these are irregular. As a result, many refugees rely solely on refugee attestations, which are often insufficient for KYC purposes. In practice, refugees' access to banking services remains constrained, while asylum-seekers have almost no access unless they hold a valid passport.



SIM Card Registration

Burkina Faso's legal framework does not restrict refugees from registering SIM cards. Decree n°20231721/PRESTRANS/PM/MTDPCE/MATDS explicitly recognises refugee attestations as valid identification for SIM card registration. Refugees can therefore register SIM cards using a valid passport, a refugee identity card, or a refugee attestation.

Asylum-seekers, however, face obstacles due to the non-recognition of their temporary certificates by mobile operators. Without a valid passport, they are unable to register SIM cards in their own name.



Mobile Money and Digital Payments

Mobile money services are widely used in Burkina Faso, with providers such as Orange Money, Moov Money, and Telecel Money offering a range of account types. Opening a mobile money account requires a registered SIM card and valid identification, enabling refugees with acceptable documentation to access these services.

Digital wallets—offered by platforms such as Sankpay, CinetPay, Touchpay, and LigdiCash—are less commonly used but remain available. Refugees with valid identity documents and registered SIM cards may access digital wallets; however, these services are often linked to a bank account or mobile money account, creating additional barriers for those with limited documentation.

Asylum-seekers are generally excluded from mobile and digital financial services due to the non-recognition of their temporary certificates and their limited ability to register SIM cards, unless they possess a valid passport.



Challenges and Practical Realities

Despite an overall supportive regulatory environment for refugee financial inclusion, the non-recognition of asylum-seeker certificates for KYC purposes remains a significant legal barrier to accessing financial and mobile services.

In practice, both refugees and asylum-seekers face multiple challenges that constrain effective access to formal financial services. These include limited issuance of refugee identity cards—particularly outside Ouagadougou—and administrative delays; limited awareness of, and inconsistent recognition of refugee documentation among financial service providers; and difficulties in obtaining proof of residence or other supporting documents. Access is further constrained by irregular and limited sources of income, the absence of a credit history, and geographic isolation that restricts physical access to financial and mobile services for many refugee populations. Low levels of digital literacy and limited financial resources also compound these barriers, significantly hindering meaningful financial inclusion.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Burkina Faso collaborates with international partners—particularly UNHCR and the World Bank—to advance refugee inclusion. Key efforts include the issuance of refugee identity cards recognised by banks and telecommunications providers for KYC purposes, the development of a national strategy for refugee integration, and participation in international and regional conventions that uphold refugee rights.

The Government also participates in an International Development Association (IDA) initiative aimed at promoting the inclusion of refugees and asylum-seekers into national systems and expanding access to essential services, including financial services. This initiative supports capacity-building efforts for refugee-led organisations, as well as financial and digital literacy programmes.

In 2025, the National Agency for the Promotion of Inclusive Finance (ANPFI) was established by Decree No. 20250091/PRES/PM/MEF (2025), in accordance with Law No. 0102013/AN (2013) on the establishment of public state institutions and Decree No. 2014610/PRES/PM/MEF (2014) on the general status of National Funds. ANPFI is a public state institution with legal personality and financial autonomy, operating under the supervision of the Ministry of Economy and Finance. Its mandate is to coordinate and promote financial inclusion, mobilise resources, and facilitate access to financial services for vulnerable populations and small and medium-sized enterprises (SMEs).

BURUNDI



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

104,253 / 1,709 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

99,173 of which 81,394 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Burundi is a State party to the 1951 Refugee Convention and its 1967 Protocol. The Government of Burundi has enacted national legislation and policy frameworks to support the reception and integration of refugees, including the 2018 Burundi Refugee and Host Community Support Strategy.

For refugees aged 14 years and above, the National Office for the Protection of Refugees and Stateless Persons (ONPRA) issues a refugee identity card. This document enables access to public services, as well as financial and mobile services. By contrast, asylum-seekers face significant barriers in accessing these services. Upon registration, they are issued a certificate confirming their status; while this document allows access to basic services, it is not recognised as a valid form of identification for KYC purposes. In addition, asylum-seekers often face difficulties in providing proof of address, leaving them largely excluded from the formal financial system.

UNHCR provides financial assistance to forcibly displaced people in Burundi through a combination of cash and mobile money transfers. A proportion of refugees receiving assistance through mobile accounts are also able to access additional financial services offered by the service provider. While UNHCR's financial assistance is primarily linked to emergency response, the relatively supportive regulatory environment facilitates some degree of digitalisation and enables access to broader financial services beyond humanitarian assistance.



Financial and Digital Access for Refugees and Asylum-seekers in Burundi

Category	Refugees	Asylum-seekers
Opening Bank accounts	● No legal barriers.	● Asylum-seeker certificates are not legally recognised as valid identification for KYC purposes. Providing proof of address may also be challenging.
Registering SIM cards	● No legal barriers.	● Asylum-seeker certificates are not legally recognised as valid identification for SIM card registration.
Opening Mobile Money Accounts	● No legal barriers.	● Asylum-seeker certificates are not legally recognised as valid identification for account opening.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Asylum-seeker certificates are not legally recognised as valid identification for access to digital wallets.



Opening Bank Accounts

Burundi's legal framework does not impose restrictions for refugees seeking to open a bank account. Financial institutions require a valid identification document- such as a passport, a refugee ID, or a national identity card. Thus, refugees can use the refugee ID card issued by ON-PRA as a form of identification.

In contrast, asylum-seekers face significant limitations. The asylum-seeker certificate issued after registration with UNHCR is not legally recognised for banking operations, and asylum-seekers often cannot provide proof of address, which further restricts their access.



SIM Card Registration

There are no legal barriers preventing refugees from registering SIM cards in Burundi, provided they present a recognised form of identification—such as a refugee identity card—to telecommunications providers.

Asylum-seekers, however, face greater challenges. In the absence of a valid passport, which many do not possess, they are generally unable to meet identification requirements, as asylum-seeker certificates are typically not accepted by mobile network operators.



Mobile Money and Digital Payments

Mobile money services in Burundi are regulated by the Bank of the Republic of Burundi (BRB) and the Ministry of Information Technology and Communication (MICT). There are no legal barriers preventing refugees from opening mobile money accounts or digital wallets. Refugees can access services such as Lumicash and Pesaflash using a mobile phone and by presenting a refugee identity card or a valid passport.

As with bank accounts and SIM card registration, asylum-seekers face significant documentation barriers, as their certificates are not formally recognised as valid identification for accessing mobile and digital financial services.

Since 2024, newly arrived refugees in the Giharo settlement have received e-money through digital accounts. To promote financial inclusion, UNHCR has partnered with FinBank to provide free bank accounts with online banking access, integrated with the Pesaflash application. This arrangement enables refugees to manage their accounts through mobile devices and facilitates broader access to digital financial services.



Challenges and Practical Realities

In Burundi, refugees generally enjoy broader access to financial and mobile services, while asylum-seekers face significant practical challenges due to the non-recognition of their identification documents and the absence of alternative verification mechanisms.

The influx of refugees in February 2025 has placed considerable strain on Burundian institutions, resulting in delays in registration and identity document issuance. As a consequence, many displaced individuals have experienced difficulties in obtaining valid identification, which has hindered access to bank accounts, SIM card registration, mobile money services, and digital wallets.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

BRB, in collaboration with the Ministry of Finance and Economic Development Planning, developed the National Financial Inclusion Strategy (NFIS) 2015–2020, which aimed to expand access to financial services, particularly for underserved groups such as rural populations, women, youth, and small entrepreneurs. While a new NFIS has not yet been adopted, enhancing financial inclusion—especially through digital finance—remains a government priority, as reflected in the 2025 *Financial Sector Stability Review* conducted by the International Monetary Fund (IMF) in collaboration with the BRB.

Since 2021, Burundi has implemented the Regional Refugee Response Plan, which promotes the socioeconomic inclusion of refugees through partnerships between the Government, UNHCR, local financial institutions, and development actors. These efforts focus on integrating refugee needs into national development frameworks and strengthening institutional capacity to support inclusive access to financial services.



CAMEROON



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
412,118 / 19,160 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
82,463 of which 6,805 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Cameroon is a State party to the 1951 Refugee Convention and its 1967 Protocol. Law No. 2005/006, in particular Chapter III, establishes the national framework for refugee status determination and protection. Article 19 recognises as refugees all asylum-seekers who held a refugee certificate issued by UNHCR prior to the law's entry into force.

UNHCR issues a Refugee Identification Card (CIR), which serves as proof of refugee status, and refugees may also obtain biometric refugee identity cards issued by the Government of Cameroon. These biometric cards enable access to a range of public and banking services. However, for refugees and asylum-seekers who hold only UNHCR-issued documentation, access to financial and mobile services remains constrained, as such documents are often not accepted by financial institutions and mobile network operators for KYC purposes.

While the regulatory environment in Cameroon is gradually becoming more enabling for refugee financial inclusion, it will take time for the rollout of biometric identification to translate into widespread access to services. For asylum-seekers, unless their documentation is formally recognised for KYC purposes, opening bank accounts, registering SIM cards, and accessing mobile and digital financial services will continue to be challenging.

UNHCR provides financial assistance to some refugees through mobile money accounts, which enable beneficiaries not only to receive humanitarian transfers but also to make payments.



Financial and Digital Access for Refugees and Asylum-seekers in Cameroon

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seeker UNHCR-issued ID documents are not formally recognised for KYC purposes and often not accepted by banks.
Registering SIM Cards	● No legal barriers.	● Asylum-seeker ID documentation typically not accepted for registering a SIM card.
Opening Mobile Money Accounts	● No legal barriers.	● Asylum-seeker ID documentation typically not accepted for opening a mobile money account.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Asylum-seeker ID documentation typically not accepted for opening a digital wallet.



Opening Bank Accounts

Cameroon's legal framework does not prohibit refugees or asylum-seekers from opening bank accounts. However, access has long been constrained by the lack of formal recognition of UNHCR-issued documentation for KYC compliance. As a result, the ability to open an account has largely depended on each bank's internal risk policies and documentation requirements. Microfinance institutions have been comparatively more flexible, as they generally accept UNHCR-issued documents.

A major shift occurred in 2025 with the launch of the national biometric identification system for refugees. Initially piloted in 2022 and legally formalised through Decree No. 2025/059 of 28 February 2025, the system introduced biometric refugee ID cards issued by the Government of Cameroon. These cards are now formally recognised for KYC purposes and accepted by banks. Despite this progress, refugees may still face challenges accessing bank accounts or other financial services, such as credit, due to additional requirements like proof of address or other supporting documents that can be difficult to obtain.

Asylum-seekers continue to face significant barriers to opening bank accounts because they lack government-issued identification and cannot meet standard documentation requirements, leaving them largely excluded from the formal financial system.



SIM Card Registration

SIM card registration is mandatory under Decree No. 2010/13, with specific obligations outlined in Decree No. 2015/3759. To register a SIM card, applicants must provide a valid ID, proof of address, and the International Mobile Equipment Identity (IMEI) number of their device.

Refugees can register SIM cards using their biometric refugee ID cards or UNHCR-issued ID cards, which are generally accepted by mobile service providers. In contrast, asylum-seekers' documents are typically not accepted due to their temporary nature and verification challenges. Difficulties providing proof of address and IMEI information can also pose obstacles, particularly for asylum-seekers.



Mobile Money and Digital Payments

Law No. 2010/12 of 21 December 2010 governs electronic communications in Cameroon. The legal framework does not restrict refugees or asylum-seekers from opening mobile money accounts or using digital wallets, but compliance with KYC regulations remains mandatory. While refugees can use their refugee ID documentation to access these services, asylum-seeker UNHCR-issued documents are not formally recognised, limiting their ability to open accounts.

Services such as MTN Mobile Money and Orange Money are widely used across the country, including by humanitarian organisations to deliver cash assistance. Refugees are often provided with mobile phones and SIM cards linked to these wallets, enabling them to securely receive, store, and spend funds electronically.



Challenges and Practical Realities

Despite supportive legal provisions, refugees and asylum-seekers in Cameroon face numerous practical barriers that limit effective access to formal financial and digital services. These challenges include the limited acceptance of UNHCR-issued documentation by banks and telecommunications providers, as well as difficulties in providing proof of address and other supporting documents required to open bank accounts or access services such as credit and insurance.

Low or unstable incomes further constrain access, making it difficult for refugees and asylum-seekers to meet minimum deposit requirements or maintain active accounts. Access is also hindered by limited awareness of available banking products, which are not always tailored to the needs of displaced populations, and by the physical distance from bank branches for those living in settlements or remote areas. Connectivity and infrastructure constraints in these locations, combined with language barriers, low levels of financial literacy, and limited familiarity with digital services, further restrict meaningful financial inclusion.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Cameroon has taken steps to improve financial inclusion for displaced populations. Since 2022, the government has issued biometric ID cards to refugees through a pilot initiative involving the Ministry of External Relations, the General Delegation for National Security, and UNHCR.

Refugees and IDPs are also identified as target groups in Cameroon's National Strategy for Financial Inclusion (NSFI) 2023–2027. This strategy aligns with the broader National Development Strategy 2030 (NDS30) and with Cameroon's commitments at the Global Refugee Forums in 2019 and 2023 to expand access to social services, promote self-reliance, and support local integration.

CENTRAL AFRICAN REPUBLIC (THE)



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

54,376 / 8,326 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

26,099 of which 4,549 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

The Central African Republic (CAR) is a State party to the 1951 Refugee Convention and its 1967 Protocol, as well as to the 1969 OAU Convention Governing the Specific Aspects of Refugee Problems in Africa. National legislation—namely, Law No. 07.019 of 28 December 2007 *on the Status of Refugees*—aligns with these international obligations and grants refugees and asylum-seekers the right to work and to access education, healthcare, and social assistance. While financial inclusion is not explicitly addressed, provisions related to employment and social assistance indirectly support access to financial services.

Recognised refugees are issued a government refugee identity card under Decree No. 1968/279, which sets out the conditions for the issuance of identification cards and travel documents to refugees. In principle, the refugee identity card may serve as proof of identity and residence for opening bank accounts; however, in practice, financial institutions do not consistently accept it. Asylum-seekers, by contrast, mainly rely on documentation issued by UNHCR, unless they hold a valid passport. UNHCR-issued documentation is not formally recognised for KYC purposes under the regulations of the Bank of Central African States (BEAC) and is therefore rarely accepted by financial institutions.

As a result, while refugees may face practical challenges in meeting requirements to open bank accounts, register SIM cards, or access mobile money services and digital wallets, asylum-seekers are largely excluded from these services due to the absence of recognised identification.

UNHCR provides cash assistance to refugees and asylum-seekers primarily through cash-over-the-counter modalities.



Financial and Digital Access for Refugees and Asylum-seekers in CAR

Category	Refugees	Asylum-seekers
Bank Accounts	No explicit legal barriers to open a bank account. However, the refugee ID card is often not accepted by banks, and additional requirements (e.g., proof of address) can be difficult to meet.	Lack of recognised ID and difficulties providing additional documentation excludes most asylum-seekers from opening bank accounts. UNHCR-issued documents are not formally recognised for KYC purposes.
Registering SIM Cards	No legal barriers.	Lack of recognised ID excludes most asylum-seekers from registering SIM cards in their own names.
Opening Mobile Money Accounts	No explicit legal barriers. However, identification issues and difficulties proving their residence can hinder access to mobile money.	Lack of recognised ID and difficulties registering SIM cards excludes most asylum-seekers from opening mobile money accounts.
Opening Digital Wallets/ Electronic Payment Accounts	No explicit legal barriers. However, identification issues and difficulties proving their residence can hinder access to digital wallets.	Lack of recognised ID and difficulties registering SIM cards and opening bank accounts prevents most asylum-seekers from opening standard digital wallets.



Opening Bank Accounts

CAR's banking sector is regulated by the Bank of Central African States (BEAC) under the rules of the Central African Economic and Monetary Community (CEMAC). To open a bank account, individuals are typically required to present a valid identity document (usually a passport), proof of residence (such as a utility bill or rental agreement), a visa or residence permit, an initial deposit—generally ranging from 10,000 to 50,000 CFA francs—and, in some cases, a reference letter.

In principle, refugees may present a government-issued refugee identity card to meet identification requirements; however, acceptance varies across financial institutions. Asylum-seekers face more significant barriers, as UNHCR-issued documentation is rarely accepted for KYC purposes and additional requirements, including proof of residence, are often difficult to fulfil.



SIM Card Registration

SIM card registration in CAR is mandatory and requires presenting a valid ID, visa or residence permit, and providing biometric data and a photo. There are no explicit legal restrictions preventing refugees and asylum-seekers from registering SIM cards. However, compliance with ID requirements presents challenges. While refugee ID cards are generally accepted by mobile network operators, this is not the case for UNHCR-issued documents. Consequently, asylum-seekers without a valid passport cannot register SIM cards in their own names.



Mobile Money and Digital Payments

Mobile money services and digital wallets—such as Orange Money, Moov Money, and Ecobank Mobile Money—are regulated by the Bank of Central African States (BEAC). Providers are required to comply with AML/CFT regulations and KYC procedures, including identity verification and proof of residence. Access to these services also requires a registered SIM card and phone number and, in some cases, linkage to a bank account.

UNHCR and other humanitarian organisations are working with mobile network operators to develop dedicated digital wallets with simplified KYC requirements for the delivery of financial assistance. In practice, however, refugees continue to face barriers to accessing mobile money services and digital wallets due to limited awareness and inconsistent application of the regulatory framework among service providers, resulting in the refugee identity card being unevenly accepted. Access is even more constrained for asylum-seekers, who generally lack recognised identity documents and face additional difficulties in providing proof of address or registering SIM cards and opening bank accounts. As a result, while some refugees may be able to access mobile money accounts or digital wallets, asylum-seekers are largely excluded from these services.



Challenges and Practical Realities

CAR's financial and digital infrastructure is underdeveloped, resulting in limited connectivity and high levels of exclusion for both displaced and host populations. The main challenge is the lack of recognised alternative IDs for asylum-seekers and inconsistent acceptance of refugee ID cards by service providers. Additional barriers include language difficulties and lack of stable income, assets and credit history - particularly for accessing advanced banking services, including credit.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Although the Central African Republic does not have specific provisions addressing the financial inclusion of refugees and asylum-seekers, Law No. 07.019 of 2007 grants refugees and asylum-seekers the right to work and to access basic services, thereby indirectly supporting financial inclusion.

At the regional level, the CEMAC Regional Financial Inclusion Strategy (2025–2029), overseen by BEAC, identifies minorities and other vulnerable groups—including refugees and cross-border migrants—as secondary target populations. Internally displaced persons are also recognised as a vulnerable group to be considered at the national level by CEMAC member States. To date, however, CAR has not developed a national financial inclusion strategy.

CHAD



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
1,430,067 / 8,791 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
572,622 of which 530,061 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

Chad is a State party to the 1951 Refugee Convention and its 1967 Protocol. In Chad, the legal framework generally supports refugees' access to financial and mobile services, including the opening of bank accounts, SIM card registration, and the use of mobile money. Refugees can, in principle, present refugee identity cards to meet KYC requirements and, although regulations governing digital wallets are still under development, service providers typically accept refugee identity cards.

However, the *Agence Nationale des Titres Sécurisés* (ANATS), the government agency responsible for issuing refugee identity cards, had not begun card production as of August 2025 due to logistical and financial constraints. In the absence of these cards, some banks have temporarily accepted refugee registration certificates as alternative forms of identification. Mobile network operators have been less flexible, which has limited refugees' access to SIM card registration and, by extension, mobile services.

The situation is more challenging for asylum-seekers, whose certificates are not formally recognised as valid identification for KYC purposes. As a result, these documents are generally not accepted by banks or mobile service providers, effectively excluding most asylum-seekers from opening bank accounts, registering SIM cards, or accessing mobile money services and digital wallets.

Beyond documentation constraints, additional factors hinder access to financial and mobile services. These include limited banking and digital infrastructure in remote areas, high levels

of poverty and food insecurity among displaced populations, and social and cultural barriers that restrict the ability of refugees and asylum-seekers to pursue economic opportunities and to access and effectively use financial and mobile services. UNHCR continues to provide financial assistance primarily through cash-over-the-counter modalities, although digital delivery channels are being explored.

Despite progress under Chad's 2023 Asylum Law and support from international partners to advance financial inclusion, significant gaps persist in practice—particularly for asylum-seekers.



Financial and Digital Access for Refugees and Asylum-seekers in Chad

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seeker certificates are not accepted as valid identification. A valid passport may be used if still valid, which is often not the case. Difficulties in providing proof of residency.
Registering SIM Cards	● Refugee identity cards are intended to be used for SIM card registration; however, these cards are not yet being issued, and existing refugee documentation is not accepted in practice by mobile operators.	● Asylum-seeker certificates are not accepted as valid identification. A valid passport may be used if still valid, which is often not the case.
Opening Mobile Money Accounts	● No explicit legal restrictions. However, delays in the issuance of refugee identity cards and the inability to use alternative documentation to register SIM cards create substantial practical barriers to accessing mobile money services.	● Asylum-seeker certificates are not accepted as valid identification. Difficulties in registering SIM cards and providing proof of residency.
Opening Digital Wallets/ Electronic Payment Accounts	N/A - Digital wallets and electronic payment accounts do not currently constitute a distinct or independently accessible service category in Chad.	N/A



Opening Bank Accounts

In Chad, the regulatory framework allows refugees to open bank accounts using refugee identity cards issued by ANATS, which are intended to serve a function similar to national identity cards. However, logistical and financial constraints have delayed the large-scale issuance of these cards. As an interim measure, some banks have accepted refugee registration certificates as alternative identification for KYC procedures.

Asylum-seekers face substantially greater barriers. Although there is no explicit legal prohibition against opening bank accounts, most asylum-seekers lack the required documentation, such as a valid passport or refugee identity card. Asylum-seeker certificates are not accepted by banks, and additional requirements—particularly proof of address or legal residence—are often difficult to meet. As a result, asylum-seekers remain largely excluded from formal banking services.



SIM Card Registration

Chad's regulatory environment does not explicitly prohibit refugees or asylum-seekers from registering SIM cards. In principle, refugees should be able to register SIM cards using refugee identity cards issued by the Government. However, delays in the production and issuance of these cards mean that many refugees currently rely on registration certificates, which are not accepted by mobile network operators as valid identification. Asylum-seeker certificates are likewise not recognised by mobile operators.

As a result, most refugees and asylum-seekers are unable to register SIM cards in their own names. For refugees, this barrier may be mitigated once the issuance of refugee identity cards becomes operational. For asylum-seekers, however, the absence of formally recognised identification constitutes a more structural constraint, continuing to limit access to mobile services.



Mobile Money and Digital Payments

Mobile money services—such as Airtel Money and Moov Money—are increasingly used in Chad, particularly in urban areas with more reliable connectivity. Providers operate under the Central African Economic and Monetary Community (CEMAC) regulatory framework, which does not explicitly exclude refugees or asylum-seekers. In principle, refugees are expected to be able to access mobile money services once ANATS begins issuing refugee identity cards. In contrast, asylum-seekers continue to face significant challenges, as they are generally unable to provide recognised identification or proof of residence. Their inability to register SIM cards further constrains access to mobile financial services.

Chad's regulatory framework for digital financial services is still evolving and does not include provisions specific to displaced populations. While there are no explicit legal restrictions, standard KYC requirements—such as a valid identity document, proof of residence, or linkage to a bank account—create substantial barriers for individuals lacking adequate documentation, particularly asylum-seekers.

Challenges and Practical Realities

Despite regulatory progress, refugees and asylum-seekers in Chad continue to face substantial practical obstacles in accessing financial and mobile services. Documentation remains a key constraint, particularly for asylum-seekers. Even refugees encounter difficulties, as refugee identity cards are not yet widely available and refugee registration certificates are inconsistently accepted by financial institutions and not accepted by mobile network operators, resulting in delays or refusals in accessing services.

Access is further constrained by widespread poverty and food insecurity, which limit the ability of displaced populations to save, maintain accounts, or participate meaningfully in the formal financial system. Geographic isolation also poses significant challenges, as many refugees live in remote areas with limited banking and telecommunications infrastructure. In addition, social and cultural barriers—including language differences, low levels of financial literacy, and experiences of discrimination—affect both access to services and the effective use of financial and mobile products.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Chad's 2023 Asylum Law marked an important milestone by granting refugees key rights, including access to land, formal employment, and freedom of movement. These rights are critical enablers of economic participation and indirectly support financial inclusion. In addition, the Government has implemented programmes aimed at restoring productive capacities, recognising refugees not only as recipients of assistance but also as economic actors.

Chad's participation in international initiatives, such as the Alliance for Financial Inclusion (AFI), as well as its partnerships with UNHCR and the World Bank, have contributed to efforts to expand access to banking, mobile money, and digital financial services for displaced populations.

CONGO (THE)



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
62,471 / 7,867 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
16 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

The Republic of the Congo is a State party to the 1951 Refugee Convention and its 1967 Protocol. Recognised refugees are legally protected under Law No. 212016 and Law No. 412021, which grant them rights broadly comparable to those of other legally residing foreigners, including access to employment and financial services.

In principle, refugees may open bank accounts, register SIM cards, and access mobile money services using identity documents issued by UNHCR or national authorities, such as refugee identity cards and, in some cases, refugee travel documents. In practice, however, stringent documentation requirements under AML/CFT and KYC regulations issued by the Economic and Monetary Community of Central Africa (CEMAC) and the Bank of Central African States (BEAC), combined with the absence of clear guidance on the acceptance of refugee documentation, significantly constrain access. As a result, many refugees are effectively excluded from formal financial and mobile services.

Asylum-seekers face even greater barriers due to their uncertain legal status and lack of recognised identification during the refugee status determination process. Most do not hold valid passports, and the temporary attestation documents issued to them are not accepted for KYC purposes. Consequently, asylum-seekers are largely unable to access formal financial services or mobile money platforms.



Financial and Digital Access for Refugees and Asylum-seekers in the Republic of Congo

Category	Refugees	Asylum-seekers
Opening Bank Accounts	No legal barriers. However, strict KYC requirements and the absence of clear guidance on the acceptance of refugee documentation lead to inconsistent recognition of refugee ID cards in practice.	Temporary documentation issued to asylum-seekers is not recognised for KYC purposes, effectively preventing access to bank accounts.
Registering SIM Cards	No legal barriers. Refugees are legally allowed to register SIM cards. They face the same documentation issues linked to KYC regulations.	Temporary documentation issued to asylum-seekers is not recognised by mobile operators.
Opening Mobile Money Accounts	No legal barriers to access, but practical constraints persist due to inconsistent acceptance of refugee documentation by service providers.	Temporary asylum-seeker documentation is not recognised for KYC purposes, limiting access to mobile money services.
Opening Digital Wallets/ Electronic Payment Accounts	Similar KYC-related documentation challenges as for bank accounts and mobile money services.	Temporary asylum-seeker documentation is not recognised for KYC purposes, restricting access to digital wallets.



Opening Bank Accounts

Banking activities in the Republic of the Congo are regulated nationally by the Central Bank of the Congo (*Banque Centrale du Congo* – BCC) and regionally under the frameworks of CEMAC and BEAC. To open a bank account, applicants are typically required to present a valid national identity card or passport, proof of address, a National Identification Number (NIU), and an initial deposit (for example, Banque Commerciale Internationale requires a minimum deposit of 10,000 CFA francs).

Although refugee identity cards and refugee travel documents are legally valid for official purposes, they are often not accepted by financial institutions in practice, as they are not explicitly listed among the forms of identification recognised under applicable KYC regulations. Refugees may also face difficulties in providing proof of address, particularly those living in informal or temporary accommodation. As a result, despite the absence of explicit legal barriers, prevailing documentation and compliance requirements frequently prevent refugees from accessing banking services. Asylum-seekers face even more restrictive conditions.

The legal framework does not explicitly guarantee them access to banking services, and the temporary attestation documents issued during the refugee status determination process do not meet KYC requirements. Consequently, asylum-seekers are generally unable to open bank accounts and remain largely excluded from the formal financial sector.



SIM Card Registration

There are no legal restrictions preventing refugees in the Republic of Congo from registering SIM cards. However, mobile network operators are required to collect and retain valid identification for all subscribers. Although refugee IDs issued by UNHCR or the government are legally recognised, they are not consistently accepted by service providers in practice.

For asylum-seekers, the situation is more restrictive. Their temporary documentation is not accepted for identity verification, and they typically do not possess valid passports. They are, therefore, mostly excluded from registering SIM cards in their own name.



Mobile Money and Digital Payments

Mobile money services such as Airtel Money and MTN MoMo are widely used and provide essential financial access for individuals without traditional bank accounts. Refugees are legally permitted to use these services. However, CEMAC Regulation No. 04/18/CEMAC/UMAC/COBAC *on Payment Services* requires strict KYC compliance, and refugee documents are frequently not accepted by both financial institutions and mobile operators. This results in inconsistent access for refugees.

Asylum-seekers are largely excluded from mobile money and digital financial services because their documents do not meet KYC requirements, and they are typically unable to register SIM cards—a prerequisite for most digital platforms.



Challenges and Practical Realities

Despite having legal access to financial and mobile services, refugees in the Republic of the Congo continue to face significant practical barriers, including inconsistent acceptance of refugee documentation and difficulties in providing proof of address. Asylum-seekers face both legal and practical constraints: their temporary certificates or attestations are not recognised for KYC purposes, and the legal framework does not grant them the same rights as recognised refugees. As a result, asylum-seekers are almost entirely excluded from formal financial services, including bank accounts, mobile money, and digital wallets.

In this context, both refugees and asylum-seekers—particularly the latter—often rely on informal channels and humanitarian cash assistance to meet their financial needs.

CÔTE D'IVOIRE



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
2,384 / 70,567 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Côte d'Ivoire is a State party to the 1951 Refugee Convention and its 1967 Protocol. In 2023, the country adopted a national asylum law (Law No 2023590 of 07 June 2023 *portant statut de réfugié*); however, the implementing decree has not yet been adopted. While national legislation does not explicitly prohibit refugees or asylum-seekers from accessing financial or mobile services, significant practical barriers continue to limit their effective access.

Documentation requirements constitute a key obstacle, particularly for asylum-seekers. Refugee identification cards issued by the National Identification Office (*Office National de l'Identification – ONI*) are recognised by financial institutions as valid identification for KYC purposes. In contrast, documents issued to asylum-seekers—such as the asylum-seeker card and temporary residence permit—are frequently not accepted. Both refugees and asylum-seekers also face difficulties in meeting additional requirements, including proof of address and, in some cases, proof of income.

National authorities recognise the importance of financial inclusion for refugees and asylum-seekers and the need to address existing regulatory and operational barriers. In collaboration with UNHCR and other partners, efforts are under way to expand cash-based interventions and to engage financial service providers in order to increase access to digital payments and bank accounts.



Financial and Digital Access for Refugees and Asylum-seekers in Côte d'Ivoire

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers	● Legislation does not explicitly prohibit or restrict asylum-seekers from opening bank accounts. However, asylum-seekers' ID documents are generally not accepted for KYC purposes.
Registering SIM Cards	● No legal barriers.	● Same issues as with opening bank accounts. Telecom operators often do not accept documents presented by asylum-seekers.
Opening Mobile Money Accounts	● No legal barriers.	● Same issues as with opening bank accounts or registering SIM cards.
Opening Digital Wallets/ Electronic Payment Accounts	● No legal barriers.	● Same issues as with opening bank accounts or registering SIM cards.



Opening Bank Accounts

Côte d'Ivoire's legislation does not explicitly restrict refugees or asylum-seekers from opening bank accounts. In practice, however, access is constrained by documentation requirements, notably proof of identity, proof of address, and confirmation of legal residence status.

KYC regulations set by the *Banque Centrale des États de l'Afrique de l'Ouest* (BCEAO) define the forms of identification that may be accepted and the additional information to be collected by financial service providers. Refugees are generally able to open bank accounts using a ONI-issued refugee identification card, supplemented by additional personal information. Nevertheless, many refugees lack stable or permanent housing, which complicates compliance with proof-of-address requirements.

Access to banking services is considerably more limited for asylum-seekers. Financial institutions frequently do not recognise asylum-seeker documentation—such as the asylum-seeker card or temporary residence permit—and asylum-seekers similarly face challenges in meeting proof-of-address requirements.



SIM Card Registration

Regulations do not explicitly prevent refugees and asylum-seekers from registering SIM cards in Côte d'Ivoire, but they may face challenges related to documentation requirements. Pursuant to Decree No. 2017-193 of 22 March 2017 on the identification of subscribers to telecommunications services open to the public, telecommunication operators - such as MTN Côte d'Ivoire - are obliged to identify a client before any service subscription or to re-identify a client on further interaction with services. This prohibits the sale of prepaid SIM cards and the activation of any SIM card without prior validation of the customer's ID.

For non-citizens, a biometric passport, a national ID issued by an ECOWAS Member state, or any biometric ID issued by ONI, including the refugee card, are acceptable forms of identification. These documents must be validated when the line is registered with the telephone operator. As for opening a bank account, identification documents provided to asylum-seekers are typically not recognised for KYC purposes. In addition, although not being a regulatory requirement for registering a SIM card, service providers may require proof of address.



Mobile Money and Digital Payments

There are no explicit legal restrictions for refugees to open a mobile money account or a digital wallet. The ONI-issued refugee card is generally accepted by service providers as valid identification, and there should be no legal barriers to accessing a mobile phone and registering a SIM card. In some cases, proof of address and other documentation may be required, which can be challenging to obtain.

In contrast, asylum-seekers face greater barriers as their identity documentation is often not accepted by service providers. As a result, while refugees may encounter practical challenges - especially if additional documentation is required - asylum-seekers often cannot meet the documentation requirements to access mobile and digital financial services.



Challenges and Practical Realities

Refugees and asylum-seekers in Côte d'Ivoire face multiple challenges in accessing financial services. Identification documents, particularly those issued to asylum-seekers, often do not meet KYC requirements, limiting their ability to access formal financial institutions. As a result, many rely on informal financial channels, which tend to be less secure and more costly. Limited access to formal financial services further constrains economic inclusion and is compounded by socioeconomic vulnerabilities that restrict participation in certain livelihood activities, especially for asylum-seekers. In some cases, refugees and asylum-seekers are issued prepaid cards that can only be used at selected merchants, which restricts their financial autonomy and limits integration into the broader economy.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

In Côte d'Ivoire, financial inclusion for refugees and asylum-seekers is an increasing policy priority. Regulatory authorities, in collaboration with UNHCR and other partners, are undertaking efforts to improve access to formal financial services for these populations. A key initiative is the Policy on Cash-Based Interventions (CBI), which aims to enable refugees to access bank accounts and mobile money services. By delivering cash assistance through beneficiary-owned payment mechanisms, this policy represents an important entry point for broader financial inclusion.

Authorities are also engaging with financial service providers to enhance access to digital payment systems and facilitate the opening of bank and mobile money accounts for refugees. In parallel, work is ongoing to address regulatory constraints that hinder financial inclusion, including through potential adjustments to KYC requirements and the issuance of clearer guidance to financial institutions.

DEMOCRATIC REPUBLIC OF CONGO (THE)



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

515,083 / 1,546 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

49,339, of which 3,156 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

The Democratic Republic of the Congo (DRC) is a State party to the 1951 Refugee Convention and its 1967 Protocol. Refugees are issued a refugee identity card by the National Commission for Refugees upon approval of their application. Regulations from the Central Bank of the Congo explicitly recognise the refugee identity card as a valid form of identification for accessing formal financial services, including traditional bank accounts as well as mobile and digital financial services.

In practice, however, access to financial services remains uneven. While mobile network operators widely accept the refugee identity card—enabling refugees to register SIM cards and open mobile money accounts—only a limited number of banks, including ECOBANK, Trust Merchant Bank, Equity Bank, and UBA, accept it for opening bank accounts. As a result, many refugees face difficulties accessing banking services or opening digital wallets with other financial institutions. Overall, an estimated 13.2 per cent of refugees have access to formal financial services, compared with 25.8 per cent of the adult population nationwide. Mobile banking usage also varies significantly across the country, ranging from below 5 per cent in North and South Ubangi, Bas-Uele, and Haut-Uele, to 54 per cent in Katanga and up to 79 per cent in Kinshasa.

Asylum-seekers face even greater barriers, as the documents issued to them—namely the asylum-seeker identity card and travel document—are not formally recognised for accessing banking or mobile financial services.

Although a limited number of asylum-seekers have been able to open bank accounts with the Banque Postale du Congo through the Lisungi Social Safety Net Programme, the majority remain excluded from the formal financial system.

UNHCR delivers financial assistance primarily through over-the-counter cash payments, with only a small proportion of refugees and asylum-seekers receiving assistance via mobile money accounts. Where used, these accounts offer functionalities beyond cash transfers, including bill payments and person-to-person transfers.



Financial and Digital Access for Refugees and Asylum-seekers in DRC

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seeker identity documents are not recognised for opening bank accounts. A limited number have accessed accounts through the Banque Postale du Congo, but the majority remain excluded.
Registering SIM Cards	● No legal barriers.	● Asylum-seeker identity documents are not recognised for SIM card registration.
Opening Mobile Money Accounts	● No legal barriers.	● Asylum-seeker documentation is not recognised as valid identification, creating barriers similar to those for SIM card registration and bank account opening.
Opening Digital Wallets/ Electronic Payment Accounts	● No legal barriers.	● Asylum-seeker documentation is not recognised as valid identification, limiting access in the same manner as for bank accounts and mobile money services.



Opening Bank Accounts

In accordance with [Central Bank of Congo's Instruction No. 45 from 30 June 2020](#), the refugee identity card is formally recognised as a valid form of identification for accessing banking services, including the opening of “special” bank accounts and “special” digital money accounts. These “special” accounts are basic products designed to promote financial inclusion among more vulnerable population groups, including refugees.

Despite this clear regulatory mandate, acceptance of the refugee identity card for opening bank accounts has been uneven, largely due to limited awareness and understanding of the applicable legislation among financial institutions. In practice, only a small number of banks—notably ECOBANK, Trust Merchant Bank, Equity Bank, and UBA—appear to be consistently applying the guidance and accepting the refugee identity card.



SIM Card Registration

Registration of SIM cards is mandatory in the Democratic Republic of the Congo and requires presentation of a valid form of identification. The refugee identity card is widely accepted for this purpose by mobile network operators. By contrast, asylum-seeker documentation issued in the DRC is not explicitly recognised as valid identification and is generally not accepted by mobile operators. As a result, most asylum-seekers face significant difficulties in obtaining a local mobile phone number in their own name.



Mobile Money and Digital Payments

The regulatory framework in the Democratic Republic of the Congo does not constitute a legal barrier for refugees to open mobile money accounts or digital wallets, but it does for asylum-seekers. This distinction stems from the explicit recognition of the refugee identity card as valid identification, while the asylum-seeker identity card and travel document are not referenced in the Central Bank of the Congo's Instruction No. 45 (2020).

In practice, opening mobile money accounts—such as MPesa by Vodacom, Orange Money, and Airtel Money—appears easier for refugees than opening digital wallets, as mobile network operators have generally complied with the Central Bank's instruction and accept the refugee identity card. By contrast, access to standalone digital wallets remains more constrained. Widely used digital financial services in the country include Wise, MPesa, Orange Money Africa, Moneytrans, MaxiCash, and PayPal.



Challenges and Practical Realities

Refugees and asylum-seekers in the Democratic Republic of the Congo face persistent challenges linked to the recognition of their identification documents when accessing financial services. These difficulties are partly driven by limited awareness and understanding of existing regulations among financial service providers. Additional constraints include bureaucratic hurdles and unfamiliarity with the local financial system, low levels of financial and digital literacy, and language and cultural barriers. Financial institutions also face operational risks related to ongoing conflict and insecurity in parts of the country, which affects their willingness to serve refugee populations. Access is further constrained by the limited availability of refugee-specific and adapted financial products, poor infrastructure and insufficient mobile network coverage, and high transportation costs to markets and service points.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Central Bank of the Congo (BCC) is implementing the Financial Sector Development Support Project (PADSFI) in the Democratic Republic of the Congo, funded by the African Development Bank under ADF15 for a total of USD 12.04 million. The project aims to modernise the financial system, enhance financial inclusion—particularly for women, youth, and small and medium-sized enterprises—and strengthen the BCC’s institutional governance. Although the project does not specifically target refugees and asylum-seekers, its emphasis on building a more inclusive financial sector is expected to benefit displaced populations in the country, including refugees and the large population of internally displaced persons.

DJIBOUTI



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

24,576 / 9,154 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Djibouti is a State party to the 1951 Geneva Refugee Convention and its 1967 Protocol and has adopted national legislation defining the status and rights of refugees and asylum-seekers. Key instruments include Law No. 159/AN/16/7^{eme} (2017), Decree No. 2017410/PR/MI, Decree No. 2017409/PR/MI, and Decree No. 2019279/PR/MI. Together, these measures established the legal and institutional framework for refugee protection, including the creation of specialised bodies such as the National Office for Assistance to Refugees and Disaster Victims.

Refugees and asylum-seekers are issued either a refugee identity card or an asylum-seeker certificate, both of which function as residence and work permits. These documents also facilitate access to formal financial services and mobile services, helping to reduce documentation-related and discriminatory barriers. UNHCR provides cash-based assistance to refugees in Djibouti—primarily through over-the-counter payments—targeting basic needs, including hygiene and sanitation.

While Djibouti's regulatory framework is broadly progressive and inclusive, practical challenges—outlined below—continue to affect financial access and effective usage among refugees and asylum-seekers, underscoring the need for sustained coordination and capacity building to advance financial inclusion.



Financial and Digital Access for Refugees and Asylum-seekers in Djibouti

Category	Refugees	Asylum-seekers
Opening Bank Accounts	Refugee ID cards are recognised as valid identification. However, additional documents typically required are difficult to obtain by refugees.	Asylum-seeker certificates are recognised as valid identification. However, additional documentation requirements are difficult to obtain by asylum-seekers.
Registering SIM Cards	No legal barriers.	No legal barriers.
Opening Mobile Money Account	No legal barriers.	No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	No legal barriers.	No legal barriers.



Opening Bank Accounts

Djibouti's financial services legal framework is aligned with its refugee legislation, notably Law No. 159/AN/16/7^{eme} (2017) and its implementing decrees. Refugees and asylum-seekers are legally entitled to open personal current accounts and fixed-term savings accounts and to access other banking services, including credit, on the same terms as national residents. In 2018, the Central Bank of Djibouti (CBD) issued a regulatory circular authorising financial institutions to accept refugee identity cards and asylum-seeker certificates as valid identification for banking services.

In practice, however, access remains highly constrained. Refugees and asylum-seekers often face difficulties meeting additional KYC requirements, particularly proof of address and income (such as payslips or employer attestations). In addition, access to credit is especially limited, as financial institutions frequently perceive these clients as higher-risk borrowers.



SIM Card Registration

There are no legal restrictions preventing refugees and asylum-seekers from purchasing and registering a SIM card. Accepted forms of identification include a passport, refugee identity card, or asylum-seeker certificate.



Mobile Money and Digital Payments

Mobile money and digital wallet services are regulated by the Central Bank of Djibouti. As with bank accounts, refugee identity cards and asylum-seeker certificates are recognised as valid forms of identification for accessing digital financial services.

Djibouti's electronic money sector is expanding, with key providers including DMoney—a subsidiary of Djibouti Telecom launched in 2020—and smaller operators such as Waafi. Refugees and asylum-seekers can register for mobile money accounts through DMoney, which is linked to the national Mobile ID system managed jointly by the Ministry of Interior and ANESIE (*Agence Nationale des Systèmes d'Information de l'État*). The gradual expansion of DMoney into rural and refugee-hosting areas is improving access to digital financial services.



Challenges and Practical Realities

Despite a broadly supportive and inclusive legal framework, refugees and asylum-seekers in Djibouti continue to face significant practical barriers to accessing financial services. These include administrative delays in refugee status determination and identity document issuance, which constrain timely access to services; limited infrastructure and local institutional capacity—particularly in rural areas—affecting access to education, employment, and entrepreneurship; and persistent misperceptions among financial institutions and telecom providers regarding the risks associated with serving refugees and asylum-seekers. Low levels of financial and digital literacy, combined with geographic isolation and cost barriers, further restrict access to formal financial institutions.

These constraints contribute to generally low levels of financial inclusion, particularly among refugee women, who face additional sociocultural, educational, and economic barriers and often rely on informal savings and credit groups as their primary financial mechanisms. To address provider-side biases, targeted advocacy and awareness-raising initiatives have shown promising results. For example, a UNHCR-led workshop in 2022 with private-sector actors, after which participating banks and mobile operators committed to expanding access for refugees and adapting products and services to better meet the needs of displaced populations.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Djibouti launched its first National Financial Inclusion Strategy (NFIS) in 2017, followed by a second strategy covering the period 2022–2027. The NFIS aims to expand access to financial services for all residents—including refugees and asylum-seekers—by streamlining identity verification processes, fostering fintech partnerships, and promoting financial literacy.

Since 2021, Djibouti has also implemented the Djibouti Regional Refugee Response Plan, which promotes the socioeconomic inclusion of refugees through collaboration among the government, UNHCR, local financial institutions, and development partners. These initiatives seek to embed refugee inclusion within national development priorities while strengthening institutional capacity for inclusive financial access.



ETHIOPIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

1,015,145 / 64,674 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

51,734, of which 4,948 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Ethiopia is a State party to the 1951 Refugee Convention and its 1967 Protocol, as well as to the 1969 OAU Convention Governing the Specific Aspects of Refugee Problems in Africa. The country has played a prominent role in advancing the Comprehensive Refugee Response Framework (CRRF), which later evolved into the Global Compact on Refugees (GCR). Ethiopia has actively participated in global refugee initiatives, including co-hosting and pledging policy reforms at the 2016 Leaders' Summit on Refugees, co-convening the first Global Refugee Forum (GRF) in 2019, and making additional pledges at the 2023 GRF.

In line with these commitments, Ethiopia enacted Refugees Proclamation No. 1110/2019, which grants refugees and asylum-seekers a broad range of rights, including freedom of movement, access to identity documentation, and the right to employment, education, and financial services. Subsequent secondary legislation further clarifies the operational modalities for implementing Article 26 of the Proclamation, which guarantees the right to work for refugees and asylum-seekers. These provisions cover wage employment, commercial activities, and participation in joint ventures, with the objective of promoting full economic inclusion. In parallel, the Government is preparing to launch a five-year (2026–2030) multisectoral strategy for the socioeconomic inclusion of refugees, known as *Makatet* (ማካተት)—Amharic for “inclusion”. The strategy adopts a phased approach, moving from initial setup and pilot interventions to consolidation and long-term sustainability, and aims to integrate refugees fully into national systems.

Refugee and asylum-seeker identity documents are issued by the Refugees and Returnees Service (RRS) and are formally recognised as valid for meeting customer-due-diligence requirements

under Ethiopia's AML/CFT framework. This recognition enables refugees and asylum-seekers to open bank accounts, register SIM cards, and access mobile money services and digital wallets.

Ethiopia has also introduced a national digital identification system, Fayda, which has been extended to include refugees and asylum-seekers. A pilot phase, launched in collaboration with UNHCR in March 2024, began in refugee-hosting areas and has since been expanded to refugee camps and surrounding host communities in the Benishangul-Gumuz, Amhara, Gambella, and Somali regions, with nationwide rollout underway.

As of January 2025, the Fayda ID has become mandatory for opening new bank accounts in Addis Ababa. A subsequent announcement by the National Bank of Ethiopia in 2025 requires that all new bank accounts be directly linked to the digital ID, with existing accounts also to be migrated and linked to Fayda. Full nationwide implementation is expected by January 2026. By providing a standardised and digitally verifiable form of identification, the Fayda system is expected to reduce persistent practical barriers to financial inclusion, particularly those arising from limited awareness of applicable legislation and unfamiliarity with refugee documentation among financial service providers, especially in the mobile and digital finance sectors.

UNHCR provides financial assistance to refugees in Ethiopia to support the fulfilment of basic needs, including food and shelter. A portion of this assistance is delivered through bank accounts, thereby facilitating access to a broader range of financial services.



Financial and Digital Access for Refugees and Asylum-seekers in Ethiopia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

Under Article 33 of Refugees Proclamation No. 1110/2019, both recognised refugees and asylum-seekers are explicitly granted the legal right to open personal bank accounts and access other banking services using identity documents issued by the Refugees and Returnees Service (RRS). The introduction of the Fayda Digital ID—a biometric national identification system—adds an additional layer of identity verification and is expected to further standardise the documentation accepted by financial institutions as the system is rolled out nationwide.

In practice, financial institutions typically require valid identification and proof of address to open a bank account and may also request an initial deposit, usually ranging from ETB 25 to 50 (approximately USD 0.16–0.32). These requirements are, in principle, attainable for displaced populations. Camp registration documents or official letters issued by the RRS may be presented as proof of address, although acceptance of such documentation is not yet uniform across institutions.



SIM Card Registration

The SIM Card Registration Directive No. 799/2021 does not explicitly mention displaced populations. However, in line with Article 34 of the Refugee Proclamation No. 1110/2019, both refugees and asylum-seekers are legally entitled to register SIM cards, and, in practice, their IDs are accepted by mobile service providers, especially in areas where the Fayda system has been implemented.



Mobile Money and Digital Payments

Mobile money and digital financial services are widely available in Ethiopia, with platforms such as Telebirr, Ebirr, CBEBirr, HelloCash, and MPESA offering services that are, in principle, accessible to refugees and asylum-seekers. Legally, displaced populations are entitled to access mobile money services and digital wallets using RRS-issued identity documents.

In practice, however, barriers persist, as service providers do not consistently accept refugee and asylum-seeker documentation, particularly for higher-tier or more advanced accounts. The rollout of the Fayda Digital ID is expected to help address these challenges by standardising identity verification requirements and improving consistency across mobile money and digital financial service providers.



Challenges and Practical Realities

Despite a supportive legal framework, refugees and asylum-seekers in Ethiopia continue to face several practical challenges to accessing financial services. These include limited awareness among service providers of the legal rights of displaced populations and inconsistent recognition of RRS-issued identity documents across financial institutions and telecom providers. Difficulties in providing proof of address further constrain access, as RRS letters or camp registration documents are not always accepted for this purpose.

Access is also affected by limited telecommunications and digital infrastructure, particularly in rural areas where most refugee camps are located; in locations such as Melkadida, poor mobile coverage and limited internet connectivity significantly restrict the use of digital financial services. In addition, in predominantly Muslim communities, including the Somali Region, the limited availability of Sharia-compliant financial products may exclude potential refugee customers, prompting reliance on informal and less secure saving and borrowing mechanisms.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Ethiopian Government has taken proactive measures to promote financial inclusion for displaced populations. Refugees Proclamation No. 1110/2019 establishes a strong legal framework supporting the integration of refugees and asylum-seekers into the formal financial and digital ecosystem. Building on this foundation, the National Bank of Ethiopia has issued directives requiring financial institutions to accept identity documents issued by the Refugees and Returnees Service (RRS) for KYC compliance. In parallel, the gradual inclusion of refugees and asylum-seekers in the Fayda Digital ID system is expected to further standardise documentation requirements across financial institutions and mobile service providers.

To strengthen digital connectivity, UNHCR and RRS have launched a multistake-holder digital initiative aimed at integrating more than 1.1 million refugees into Ethiopia's national digital agenda. Implemented in partnership with actors such as the Dutch Embassy, GSMA, and the International Telecommunication Union (ITU), the initiative contributes to a broader global objective for 2030 and focuses on improving access to essential services. Its immediate priorities include expanding network coverage in refugee-hosting areas and increasing the affordability of digital devices.

GHANA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

18,351 / 549 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Ghana is a State party to the 1951 Refugee Convention and its 1967 Protocol. Ghana's legal framework is generally supportive of refugee financial inclusion. Officially recognised refugees can obtain a Non-Citizen Ghana Card, which enables them to meet KYC requirements for accessing financial and digital services, including bank accounts, SIM cards, mobile money, and digital wallets. In practice, however, refugees continue to face barriers, including complex administrative procedures that lead to delays and documentation gaps, as well as inconsistent implementation across financial institutions.

Asylum-seekers face more severe constraints. They are not eligible for the Non-Citizen Ghana Card, and the absence of clear regulatory guidance to financial institutions on the status of asylum-seeker documentation prevents many from meeting KYC requirements. This effectively excludes most asylum-seekers from opening bank accounts, registering SIM cards, or accessing mobile money and digital wallet services.

UNHCR provides financial assistance to a limited number of refugees to support the fulfilment of basic needs. This assistance is delivered through mobile wallets, which offer functionalities beyond basic cash transfers.



Financial & Digital Access for Refugees and Asylum-seekers in Ghana

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seekers are often unable to meet KYC requirements, as they are not eligible for the Non-Citizen Ghana Card and may lack a valid passport.
Registering SIM Cards	● No legal barriers.	● As with bank account opening, asylum-seeker documentation is not recognised for KYC purposes.
Opening Mobile Money Accounts	● No legal barriers.	● Asylum-seeker documentation is not recognised for KYC purposes.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Asylum-seeker documentation is not recognised for KYC purposes.



Opening Bank Accounts

Refugees in Ghana are legally permitted to open bank accounts, although documentation requirements vary across financial institutions. These typically include a valid form of identification—most commonly the Non-Citizen Ghana Card—together with proof of address and, in some cases, proof of employment or a residence permit. While the Ghana Card facilitates access to banking services, many refugees experience difficulties in meeting proof-of-address or employment requirements, particularly those without fixed accommodation or formal work arrangements. Some banks, including First National Bank, may also require a reference letter from the Ministry of Interior or another competent authority.

Asylum-seekers face more restrictive conditions in practice. Although they are not explicitly prohibited from opening bank accounts, the documentation commonly required by financial institutions—such as a Non-Citizen Ghana Card or residence permit—is generally not available to them. The asylum-seeker certificate issued by the authorities is not widely recognised by banks for KYC compliance, effectively excluding most asylum-seekers from accessing formal banking services.



SIM Card Registration

Refugees in Ghana may register SIM cards without legal restrictions, provided they possess a Non-Citizen Ghana Card. This card serves as a valid form of identification and proof of address, enabling access to mobile communication services. Asylum-seekers, by contrast, often cannot meet the required documentation standards, which significantly limits their ability to register SIM cards and access mobile services.



Mobile Money Accounts and Digital Payments

Ghana has a well-established mobile money and digital finance ecosystem, including services such as MTN MoMo, Vodafone Cash, AirtelTigo Money, and GhanaPay. Refugees can access mobile money accounts and digital wallets provided they hold a Non-Citizen Ghana Card and a registered SIM card. While these services are subject to KYC requirements—typically including proof of identity and residence—refugees who possess the Ghana Card are generally able to meet these requirements in practice.

As with bank accounts, asylum-seekers face significant constraints in accessing mobile money and digital wallet services. Although they are not explicitly barred, most are unable to satisfy KYC requirements, as the forms of identification they hold are not consistently recognised by service providers. In some cases, alternative documents—such as government-issued certificates or reference letters—may be accepted, but practice remains uneven. Uncertainty surrounding the legal status of asylum-seeker documentation and the absence of clear guidance from the National Identification Authority further contribute to their exclusion from digital financial services.



Challenges and Practical Realities

Despite regulatory efforts to promote financial inclusion, refugees and asylum-seekers in Ghana continue to face significant practical barriers. For refugees, key challenges include difficulties in obtaining proof of residence, navigating complex and often fragmented documentation processes, and limited awareness of their rights, including eligibility for the Non-Citizen Ghana Card.

Asylum-seekers face even more severe constraints due to their lack of recognised legal status and ineligibility for the Non-Citizen Ghana Card. Without access to widely accepted forms of identification, they are generally unable to meet KYC requirements, resulting in inconsistent treatment across financial institutions and reliance on informal financial mechanisms.

Beyond documentation-related obstacles, broader factors—such as economic insecurity, language barriers, and low levels of financial literacy—further limit both refugees’ and asylum-seekers’ engagement with formal financial systems.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Ghana has taken steps to advance refugee financial inclusion through collaboration among the Ghana Refugee Board, the National Identification Authority, and UNHCR. This cooperation has enabled the issuance of Non-Citizen Ghana Cards to recognised refugees, facilitating access to banking, healthcare, and social services. In parallel, the Bank of Ghana has adopted a risk-based approach to KYC compliance, which allows for greater flexibility in documentation requirements and has the potential to improve access to formal financial services for refugee populations.

KENYA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

626,546 / 228,305 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

89,181, of which 88,758 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Kenya is a State party to the 1951 Refugee Convention and its 1967 Protocol. Kenya's regulatory framework for the financial inclusion of refugees and asylum-seekers has evolved significantly over the course of this research. Notably, key legislation on SIM card registration and access to mobile money was adopted in June 2025, and regulations governing access to banking services are currently under review.

Refugee Act No. 10 of 2021 grants refugees and asylum-seekers rights comparable to those of other foreign nationals, including access to identification and civil registration documents, as well as the right to engage in employment, business, and professional activities. In addition, a Gazette Notice dated 19 September 2021 formally recognises a range of documents—including asylum-seeker passes, proof of registration, movement passes, refugee identity cards, letters of recognition, and travel documents—as valid for accessing government services.

However, this legal recognition did not initially extend to financial and mobile services. Under the 2023 AML/CFT Regulations, refugee and asylum-seeker documents were not included among the accepted forms of identification for KYC purposes. Nevertheless, partnerships between UNHCR and selected private banks have enabled some refugees to open bank accounts in practice, despite the absence of fully aligned secondary legislation. This has been particularly relevant for refugees receiving UNHCR financial assistance through bank accounts, which in turn facilitates access to a broader range of financial services available to the host population.

Progress has been more pronounced in relation to SIM card registration and mobile money. Amendments to the *Kenya Information and Communications Act* introduced in June 2025 now permit the use of refugee identity cards to register SIM cards and access mobile money and digital wallet services. Asylum-seeker documentation, however, is still not formally recognised for KYC purposes under the revised framework.

Taken together, these developments are reshaping Kenya's regulatory landscape and creating new opportunities—particularly for refugees—to access financial and mobile services. Nonetheless, significant efforts are still required to ensure full, consistent, and nationwide implementation.



Financial and Digital Access for Refugees and Asylum-seekers in Kenya

Category	Refugees	Asylum-seekers
Opening Bank Accounts	Refugee identity documents are not formally recognised as valid identification for opening bank accounts. However, partnerships between UNHCR and two commercial banks allow for simplified KYC procedures. Relevant legislation remains under review.	Similar constraints apply to asylum-seekers. Two commercial banks apply simplified KYC procedures under partnership agreements with UNHCR, while the broader legal framework remains under review.
Registering SIM Cards	No legal barriers.	Asylum-seeker identity documents are not formally recognised under the revised legislation and are therefore accepted inconsistently by service providers.
Opening Mobile Money Accounts	No legal barriers.	Asylum-seeker identity documents are not formally recognised under the revised legislation and are therefore accepted inconsistently by service providers.
Opening Digital Wallets/Electronic Payment Accounts	No legal barriers.	Asylum-seeker identity documents are not formally recognised under the revised legislation and are therefore accepted inconsistently by service providers.



Opening Bank Accounts

Kenyan legislation does not explicitly restrict who may open a bank account; however, financial institutions are required to verify customer identities and monitor transactions in line with regulatory obligations. The *Proceeds of Crime and Anti-Money Laundering Act* (Cap. 59A, section 45) mandates customer identification, while the *Data Protection Act* governs the secure handling of personal data.

Under the current regulatory framework, identity and travel documents issued to refugees and asylum-seekers are not formally recognised as valid for meeting KYC requirements. Despite this limitation, partnerships between UNHCR and selected private banks have enabled some refugees to open bank accounts in practice. These arrangements typically rely on a combination of documents, including a Refugee Identification Card, a Kenya Revenue Authority (KRA) PIN certificate, a work permit, and a letter of recognition issued by the Department of Refugee Services (DRS) under the Ministry of Interior and National Administration. For refugees receiving UNHCR financial assistance, UNHCR provides an endorsement to the bank, which may then apply simplified KYC procedures.

A forthcoming legislative amendment is expected to formally recognise refugee documentation for the purpose of opening bank accounts, which would remove one of the most significant remaining legal barriers to financial inclusion for refugees and asylum-seekers in Kenya



SIM Card Registration

Kenyan law does not explicitly restrict who may register a SIM card, with requirements governed by the Kenya Information and Communications Act (KICA). Under the Kenya *Information and Communications (Registration of Telecommunications Service Subscribers)* Regulations introduced in June 2025 through Legal Notice No. 90, refugees are now permitted to use their refugee identity card to register SIM cards. Asylum-seeker documentation, however, is not included among the forms of identification recognised for KYC purposes under the revised framework and is therefore accepted inconsistently by mobile service providers.



Mobile Money and Digital Payments

Payment service providers in Kenya operate under the *Kenya Information and Communications Act* (KICA) (Cap. 411A) and the *National Payment Systems Act* (Cap. 491A), which regulate both mobile network operators and mobile payment service providers. Mobile wallet services—such as MPesa (Safaricom), Airtel Money (Airtel), and TKash (Telkom)—are widely used, with MPesa being the most prevalent.

Following recent regulatory changes allowing refugees to register SIM cards using their refugee identity cards, refugees are now also eligible to subscribe to mobile wallet services. However, access to PayPal and other international digital wallets—which typically require linkage to a bank account—remains limited for many refugees. This constraint is expected to be addressed once the revised banking regulations enter into force.

Asylum-seekers face more significant barriers to accessing mobile money accounts and digital wallets, as their identity documents are not formally recognised for KYC purposes and are therefore accepted inconsistently by service providers.



Challenges and Practical Realities

Despite progress in Kenya's regulatory environment to facilitate access to financial and mobile services for refugees and asylum-seekers, significant challenges remain. KYC regulations governing access to banking services are still under review, which means that only a limited number of refugees and asylum-seekers—primarily those supported through UNHCR partnerships with two commercial banks—are currently able to open bank accounts.

Although simplified KYC requirements for SIM card registration and access to mobile and digital services entered into force in June 2025, the legislation provides for a six-month compliance period. During this transitional phase, service providers are expected to train staff, upgrade internal systems, and adapt procedures to accommodate refugee documentation, which may result in uneven implementation in the short term.

Beyond regulatory constraints, refugees and asylum-seekers continue to face a range of practical barriers. Economic insecurity is widespread, with many relying on informal or low-paid employment, limiting their ability to save, qualify for credit, or absorb the costs associated with remittances, mobile money fees, or account maintenance. Social and cultural factors—including language barriers and low levels of financial and digital literacy—further hinder understanding and effective use of financial services.

Discrimination also persists in some contexts, creating additional obstacles to financial access and broader economic participation. Access is further constrained by infrastructure and technology gaps, particularly in remote areas where refugees and asylum-seekers may lack proximity to banks, ATMs, or mobile money agents, and where limited smartphone ownership and unreliable internet connectivity continue to undermine digital financial inclusion.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Kenyan authorities have increasingly recognised the importance of financial inclusion for refugees and asylum-seekers. Progress in this area has been supported through collaborative efforts involving UNHCR and its partners, including awareness-raising initiatives and the establishment of a technical working group to identify and address practical implementation challenges. A key milestone has been the inclusion of refugees and asylum-seekers as a priority outcome group in the National Financial Inclusion Strategy 2025–2027.

More broadly, the *Shirika Plan*, a joint initiative of the Government of Kenya and UNHCR, seeks to integrate refugees into national socioeconomic systems, including the formal financial sector. Access to financial tools—such as bank accounts, savings mechanisms, and credit—is recognised as essential to fostering economic participation, promoting self-reliance, and reducing long-term dependence on humanitarian assistance.

A range of complementary initiatives further support these objectives. The Kakuma Kalobeyei Challenge Fund, a blended finance initiative involving the International Finance Corporation (IFC), the Government of Kenya, UNHCR, and other stakeholders, mobilises public and private capital to expand access to financial services and has supported two commercial banks in extending services to refugees in the Kakuma and Kalobeyei areas. In parallel, the *Haba Haba Savings Scheme*—an initiative of the National Social Security Fund (NSSF) originally designed for low-income host-community members—has been adapted in collaboration with UNHCR to better meet refugee needs. Through partnerships with local organisations and financial institutions, refugees are able to participate in savings groups, access small loans, and receive financial literacy training.

MALAWI



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

35,228 / 23,391 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

49,339, of which 3,156 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Malawi is a State party to the 1951 Refugee Convention and its 1967 Protocol. Individuals recognised as refugees are typically issued a refugee identity card and, for international travel, a Convention Travel Document. As part of the Refugee Status Determination (RSD) process, refugees in Malawi may also be enrolled in the National Registration and Identification System (NRIS) and issued identity cards recognised by the government and valid for five years. By contrast, asylum-seekers are not enrolled in NRIS and rely primarily on UNHCR-issued documentation, such as UNHCR factsheets.

There are no explicit legal provisions preventing refugees or asylum-seekers from accessing financial or mobile services. In practice, refugees can generally use their government-issued identity cards to open bank accounts, register SIM cards, and access mobile money services or digital wallets. Asylum-seeker documentation, however, is not formally recognised for KYC purposes and may be rejected by financial service providers. Mobile money services tend to be more accessible than banking services, as both refugees and asylum-seekers can often register SIM cards if they are able to present some form of identification. Beyond proof of identity, additional requirements—such as proof of address or employment—can be difficult for both groups to satisfy.

Centenary Bank was the first financial institution to introduce simplified KYC procedures and to provide both financial and non-financial services directly within the Dzaleka Refugee Camp, which hosts more than 90 per cent of Malawi's refugee and asylum-seeker population. NBS Bank Malawi has also begun engaging directly with refugee clients. Given Malawi's historically low levels of financial inclusion, including among host communities, sustained efforts are under way to improve financial literacy and expand digital access for both displaced and host populations.



Financial and Digital Access for Refugees and Asylum-seekers in Malawi

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal restrictions but UNHCR Fact-sheets are not explicitly recognised for KYC purposes and may not be accepted by financial institutions.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● No legal restrictions but similar practical issues as for opening a bank account – inconsistent acceptance of UNHCR Factsheet and difficulties to provide proof of address and other additional documentation.



Opening Bank Accounts

There are no explicit legal provisions preventing refugees or asylum-seekers from opening bank accounts in Malawi. In practice, however, the regulatory framework—particularly the customer-due-diligence requirements under the Malawi *Banking Act* (2010)—creates significant barriers. Section 51 requires financial institutions to verify both the identity and address of customers, typically through a valid identity document combined with proof of residence and, in some cases, proof of income.

Refugees, who may obtain refugee identity cards and be enrolled in the National Registration and Identification System (NRIS), often face difficulties in meeting these additional requirements, particularly proof of address or employment. Asylum-seekers, who are not enrolled in NRIS, rely on UNHCR-issued factsheets, which are not consistently recognised by financial institutions for KYC purposes.

Despite these constraints, Centenary Bank (formerly New Finance Bank) established a branch in the Dzaleka Refugee Camp after receiving a waiver from the Reserve Bank of Malawi allowing the acceptance of refugee and asylum-seeker documentation for KYC compliance. More recently, NBS Bank Malawi has also begun providing banking services directly to refugee populations.



SIM Card Registration

SIM card registration in Malawi is governed by the *Communications (SIM Card Registration) Regulations* of 2023, which require subscribers to provide proof of identity and address. Refugees, who generally hold refugee identity cards and are enrolled in the National Registration and Identification System (NRIS), are typically able to meet these requirements without major difficulty. Asylum-seekers, however, may encounter challenges where their documentation is not recognised by telecom providers. While the regulations allow some flexibility regarding acceptable forms of identification, practices vary across providers, and there is no evidence of systematic exclusion of asylum-seekers from SIM card registration.



Mobile Money and Digital Payments

Malawi's regulatory environment is broadly supportive of access to mobile money for refugees and asylum-seekers. Mobile money services such as Airtel Money and TNM Mpamba generally require only a valid identity document and a registered mobile number. Refugees are typically able to use their refugee identity cards for this purpose, while asylum-seekers may register using UNHCR-issued documentation. However, asylum-seeker documents are usually valid for a limited period—often one year—and are not consistently accepted by service providers.

Digital wallets are, in principle, legally accessible to both refugees and asylum-seekers, but in practice access is often constrained by additional requirements, such as proof of income or residence. These challenges largely mirror those encountered when opening bank accounts.



Challenges and Practical Realities

Despite a generally inclusive legal framework, refugees and asylum-seekers in Malawi continue to face several practical barriers to financial inclusion. These include inconsistent recognition of their identity documentation, limited access to mobile phones and internet connectivity, and low levels of financial literacy. Additional constraints such as minimum balance requirements and limited familiarity with formal financial systems further hinder effective access and sustained use of financial services.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

While Malawi's regulatory authorities, including the Reserve Bank of Malawi, have not adopted financial inclusion policies specifically targeting refugees or asylum-seekers, they apply a risk-based approach to KYC and customer due diligence aligned with international standards, which allows for regulatory flexibility.

In 2018, the Reserve Bank of Malawi granted a regulatory waiver allowing a commercial bank to accept UNHCR identity cards and factsheets for KYC purposes. Following this waiver, New Finance Bank (now Centenary Bank Malawi) opened a branch in the Dzaleka Refugee Camp and began offering a range of services, including savings accounts, group lending, ATM access, foreign exchange, and financial literacy and business skills training.

MALI



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

138,530 / 296 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

39,639, of which 35,020 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

For asylum-seekers: **TO BE DEVELOPED**

Mali is a State party to the 1951 Refugee Convention and its 1967 Protocol. Law No. 9840 of 1998 grants refugees rights broadly comparable to those of nationals in areas such as health, education, and employment. Despite this legal framework, refugees and asylum-seekers continue to face significant barriers to accessing formal financial and mobile services, largely due to regulatory requirements and documentation constraints.

Identity documents issued to refugees and asylum-seekers are not equivalent to national identity cards and are therefore often not accepted by financial institutions and telecom providers for KYC compliance. Proof-of-address requirements further compound these challenges, as many refugees and asylum-seekers live in temporary accommodation or lack formal tenancy arrangements.

Advocacy efforts by UNHCR and other stakeholders have led to some progress, including official guidance encouraging telecom providers to accept refugee identity cards and asylum-seeker certificates for SIM card registration. However, implementation remains inconsistent in practice, and the majority of refugees and asylum-seekers remain excluded from the formal financial system.



Financial & Digital Access for Refugees and Asylum-seekers in Mali

Category	Refugees	Asylum-seekers
Opening Bank Accounts	Refugee identity cards are not accepted for KYC purposes, and refugees often face difficulties providing proof of address.	Asylum-seeker certificates are not accepted for KYC purposes, with similar challenges to refugees regarding proof of address.
Registering SIM Cards	Documentation barriers persist. Despite past official guidance encouraging acceptance of refugee identity cards, enforcement is limited, and proof-of-address requirements remain problematic.	Similar constraints apply. Guidance encouraging acceptance of asylum-seeker certificates is not consistently followed by mobile network operators, and proof-of-address requirements pose additional barriers.
Opening Mobile Money Accounts	Limited access due to lack of recognised identity documents and challenges in meeting proof-of-address requirements.	Limited access due to lack of recognised identity documents and challenges in meeting proof-of-address requirements.
Opening Digital Wallets/Electronic Payment Accounts	Lack of recognised identity documents and proof of address significantly constrains access to digital wallet services.	Lack of recognised identity documents and proof of address significantly constrains access to digital wallet services.



Opening Bank Accounts

Mali is a member of the West African Economic and Monetary Union (WAEMU), and its financial sector is regulated by the Central Bank of West African States (BCEAO). Under BCEAO Instruction No. 003032025, banks are required to collect detailed customer information and may accept only specified forms of identification—typically national identity cards, passports, or residence permits—for KYC compliance. Refugee identity cards are not explicitly recognised under this framework, leading most banks to reject them. In addition, a foreign exchange regulation issued on 20 December 2024 requires prior BCEAO authorisation to open CFA franc accounts for non-residents, a category that includes refugees and asylum-seekers. This requirement introduces further uncertainty and discourages banks from onboarding displaced individuals.

Beyond identification constraints, proof-of-address requirements and minimum deposit thresholds constitute additional barriers. While some banks—notably AFG Bank Mali—have accepted refugee identity cards for guardians opening accounts on behalf of minors, this practice does not extend to adult account holders. As a result, although there is no explicit legal prohibition, existing banking regulations and supervisory practices effectively exclude most refugees and asylum-seekers from opening bank accounts in Mali.



SIM Card Registration

Malian law does not restrict SIM card registration on the basis of nationality. In practice, however, stringent identification requirements enforced by the Malian Authority for the Regulation of Telecommunications (AMRTP) and the Ministry of Communication significantly limit access for refugees and asylum-seekers.

Historically, mobile network operators did not accept refugee documentation, forcing many displaced individuals to rely on informal markets to obtain SIM cards. Advocacy efforts—including UNHCR's *One Household, One Phone* initiative implemented between 2021 and 2022—led to official guidance encouraging operators to accept refugee identity cards and asylum-seeker certificates for SIM registration. Despite this progress, implementation remains uneven. Access continues to be constrained by inconsistent acceptance of documentation, proof-of-address requirements, and limited registration points, particularly in areas affected by insecurity.



Mobile Money and Digital Payments

Mobile money services in Mali—such as Orange Money, Moov Money, and MobiCash—are regulated under BCEAO Instructions No. 001012024 and No. 001032025, which require customer identity verification and compliance with KYC standards. While there are no explicit legal provisions preventing refugees and asylum-seekers from opening mobile money accounts, documentation requirements constitute a major practical barrier.

As with bank accounts, refugee identity cards and asylum-seeker certificates are generally not recognised by service providers, and proof-of-address requirements are difficult to meet due to unstable or informal living arrangements. Digital wallets, which operate under similar regulatory frameworks, are subject to the same constraints, further limiting access to digital financial services for displaced populations.



Challenges and Practical Realities

Refugees and asylum-seekers in Mali face multiple barriers to financial inclusion. These include limited acceptance of identity documents due to delays in registration and inconsistent recognition of refugee and asylum-seeker documentation by financial institutions, which often perceive displaced individuals as higher risk clients. Difficulties in providing proof of address further constrain access, as many live in temporary or informal accommodation. Low levels of digital literacy and limited familiarity with the local financial system also hinder effective use of financial services. These challenges are compounded by infrastructure constraints—such as unreliable electricity and inconsistent network coverage, particularly in rural areas—as well as ongoing insecurity. Collectively, these barriers push many refugees and asylum-seekers towards informal financial mechanisms.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Mali has taken some steps to promote financial inclusion for displaced populations. These include Law No. 9840 (1998) and the Statelessness Law adopted in June 2025, which affirm rights to identity, employment, and access to public services, as well as the National Financial Inclusion Strategy (2021–2026), which targets vulnerable groups and implicitly includes displaced populations. Collaboration between the National Commission for Refugees and UNHCR has also supported registration processes and advocacy for greater inclusion.

Nevertheless, these measures remain insufficient to ensure effective, predictable, and consistent access to the formal financial system for refugees and asylum-seekers, particularly in light of prevailing regulatory and documentation barriers.



NAMIBIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

5,347 / 1,277 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

6,623, of which 3,156 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **MIXED**

Namibia is a State party to the 1951 Refugee Convention and its 1967 Protocol. The 1999 Namibia *Refugees (Recognition and Control) Act* establishes the legal framework for refugee status determination and sets out the procedures, rights, duties, and institutional arrangements governing refugee protection in the country.

Namibian legislation does not explicitly prohibit refugees or asylum-seekers from opening bank accounts, registering SIM cards, or accessing mobile money services and digital wallets. In practice, however, significant barriers persist, including stringent identification requirements, limited awareness among service providers, and administrative delays. Despite broader national initiatives—such as the National Financial Inclusion Strategy and the nationwide SIM card registration campaign launched in 2024—refugees and asylum-seekers continue to face challenges in accessing formal financial services, particularly banking services.

In this context, mobile money has become an increasingly important channel for financial access. UNHCR delivers financial assistance to refugees through mobile accounts, which offer functionalities beyond basic cash transfers and enable access to services similar to those available to host communities, including money transfers, debt repayments, and savings mechanisms.



Financial and Digital Access for Refugees and Asylum-seekers in Namibia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	No explicit legal restrictions; however, practical requirements—particularly valid identification and proof of residence—make account opening difficult, as many refugees do not hold standard national ID cards.	Asylum-seekers face significant challenges in opening bank accounts, as KYC-compliant documentation is generally not issued to, or obtainable by, asylum-seekers.
Registering SIM Cards	No legal barriers.	No legal barriers.
Opening Mobile Money Accounts	No legal barriers.	No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	Similar documentation challenges as for opening bank accounts; in most cases, digital wallets are linked to bank accounts.	Similar documentation challenges as for opening bank accounts, limiting access to digital wallet services.



Opening Bank Accounts

Namibia's domestic legislation does not explicitly prohibit refugees or asylum-seekers from opening bank accounts. In practice, however, administrative requirements and bureaucratic procedures create significant barriers for both groups.

As part of its broader financial inclusion agenda, Namibia has introduced “basic accounts” for individuals who do not meet standard banking requirements. Access to these accounts is limited to Namibian citizens and permanent residents, and applicants are still required to provide valid identification. The documentation typically required to open a bank account includes a Namibian identity card or a valid passport, as well as proof of income and proof of residence. Where proof of residence is unavailable, government authorities may assist by confirming an individual's identity and legal status. Urban refugees may use a municipal account as proof of residence, while those living in refugee settlements may rely on a police affidavit.

Asylum-seekers generally must wait until they are formally recognised as refugees before being able to open a bank account. In exceptional cases where the government-issued bio form is not accepted by financial institutions, the Ministry of Home Affairs, Immigration, Safety, and Security may grant approval on a case-by-case basis.



SIM Card Registration

As with banking services, Namibian law does not restrict SIM card registration to citizens. In practice, however, requirements such as presenting a national identity card or passport, together with proof of residence, can pose challenges for refugees and asylum-seekers.

Under the Communications Act of 2009, all SIM cards must be registered with mobile service providers. A nationwide SIM card registration campaign conducted between 2023 and March 2024 enabled many refugees and asylum-seekers—both within and outside refugee settlements—to successfully register SIM cards. Refugees receiving UNHCR financial assistance in the Osire settlement benefited from additional facilitation through the CBI programme, which helped mitigate documentation and access-related constraints.



Mobile Money and Digital Payments

Namibia's regulatory framework does not prohibit refugees or asylum-seekers from opening mobile money accounts or using digital wallets. In practice, however, KYC requirements continue to necessitate valid identification, which some applicants struggle to provide.

For mobile money services, refugees and asylum-seekers may use government-issued bio forms as acceptable identification. Access to digital wallets—particularly those linked to bank accounts—often entails more extensive documentation and therefore presents greater challenges. The process is generally more straightforward for individuals using digital wallets solely for receiving funds, as activation may be completed using a registered SIM card without requiring linkage to a bank account.

Common mobile money and digital payment services in Namibia include MTC MobileHomePay, PayPal, and Google Pay.



Challenges and Practical Realities

Access to required documentation remains a significant challenge for displaced populations in Namibia. Refugees may struggle to obtain or replace copies of identity documents, while asylum-seekers often lack documentation that is recognised for meeting KYC requirements. Additional barriers include limited awareness of available financial services—often linked to language constraints, literacy gaps, or unfamiliarity with formal financial systems—as well as complex bureaucratic procedures and inconsistent implementation of documentation rules across service providers. Low levels of financial and digital literacy further restrict effective uptake and use of services. Even where documentation is available, navigating administrative processes can be difficult, contributing to persistently low levels of meaningful financial inclusion.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

While Namibia's legislation does not explicitly address the financial inclusion of refugees and asylum-seekers, the *Namibia Refugees (Recognition and Control) Act* of 1999 and its Regulations of 2000 grant recognised refugees a set of legal rights that indirectly support access to formal financial systems.

Namibia's National Financial Inclusion Strategy seeks to expand access to banking services, mobile money, and financial literacy programmes across the population. Major financial institutions—including the Bank of Namibia, Bank Windhoek, Standard Bank, Nedbank, and First National Bank—offer basic accounts designed for low-income populations. Banking regulations also emphasise principles of non-discrimination, encouraging financial institutions to serve all individuals who are able to meet the applicable identification and due-diligence requirements.

To further strengthen inclusion in practice, UNHCR and partner organisations collaborate with financial institutions to improve access to financial services and financial literacy, particularly in remote and refugee-hosting areas such as the Osire settlement.

NIGER (THE)



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
391,862 / 41,695 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
141,249, of which 65,363 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Niger is a State party to the 1951 Refugee Convention and its 1967 Protocol, as well as to the 1969 OAU Convention Governing the Specific Aspects of Refugee Problems in Africa. Refugee status in Niger is governed by Act No. 97016 of 20 June 1997, supported by Decree No. 983821/PRN/MII/AT of 24 December 1998. This framework grants recognised refugees access to financial services on terms broadly comparable to those applicable to Nigerien citizens.

In line with AML/CFT regulations and KYC requirements established by the Central Bank of West African States (BCEAO), financial institutions and mobile service providers are required to verify the identity of their customers. The refugee identity card issued by the National Eligibility Commission (CNE) is formally recognised for this purpose.

Refugees are therefore legally permitted to open bank accounts, register SIM cards, and access mobile money services and digital financial products using their identity documents. In practice, however, additional requirements—such as proof of address and proof of employment or income—pose challenges, particularly for refugees without stable housing or formal employment. Limited awareness of the applicable legal framework among financial institutions may also result in inconsistent acceptance of refugee identity cards, while underdeveloped banking and digital infrastructure, especially in rural areas, further constrains access.

Asylum-seekers face more restrictive conditions. The temporary identification documents issued during the refugee status determination process are not legally recognised for KYC purposes and are generally rejected by financial institutions. As a result, while financial inclusion for recognised refugees is gradually improving, the absence of specific legal provisions applicable to asylum-seekers continues to leave them largely excluded from the formal financial system.



Financial and Digital Access for Refugees and Asylum-seekers in Niger

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Temporary asylum-seeker documents are often not recognised for KYC compliance, and additional requirements—such as proof of address—are difficult to meet.
Registering SIM Cards	● No legal barriers.	● Temporary asylum-seeker documents are frequently not accepted for SIM card registration. A discretionary “favouritism” scheme has enabled some asylum-seekers to access mobile services.
Opening Mobile Money Accounts	● No legal barriers.	● Asylum-seekers often struggle to meet documentation requirements, as their temporary identity documents are not consistently accepted by service providers.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Asylum-seeker documentation is often not accepted by service providers, limiting access to digital wallet services.



Opening Bank Accounts

Niger’s legal framework, notably Law No. 97016 of 20 June 1997, grants recognised refugees rights broadly comparable to those of citizens, including access to financial services. In practice, banks typically require valid identification and proof of address to open an account and may also request proof of income or employment, as well as identity documents from the country of origin, in line with their internal risk policies.

Recognised refugees face no legal barriers to accessing basic banking services, and refugee identity cards issued by the National Eligibility Commission (CNE) are formally recognised for meeting KYC requirements.

However, additional documentation requirements—particularly proof of address, proof of employment, or supplementary identity documents—can be difficult to satisfy for many refugees.

The situation is more restrictive for asylum-seekers. Although there is no explicit legal prohibition preventing them from opening bank accounts, the temporary registration documents issued during the refugee status determination process are rarely accepted by banks. Strict AML/CFT and KYC requirements under the BCEAO framework further constrain access, as asylum-seekers often cannot meet additional documentation requirements due to the lack of stable housing or formal employment.



SIM Card Registration

SIM card registration is mandatory in Niger under Decree No. 2012-433 of 4 October 2012, issued by the Ministry of Communication and New Information Technologies. Recognised refugees are legally permitted to purchase and register SIM cards using their CNE-issued refugee identity cards, which are accepted by mobile network operators.

The law also allows a system of “favouritism,” whereby one person with valid documents can vouch for up to five others. Although this scheme - along with UNHCR initiatives such as the Green Line project - can help undocumented individuals, including asylum-seekers, gain access to SIM cards, it does not address asylum-seekers’ lack of formally recognised ID documents. As a result, unless KYC requirements are further relaxed to include asylum-seeker documentation, access to mobile services will remain limited.



Mobile Money and Digital Payments

Mobile money services in Niger—such as Orange Money, Moov Africa Money, and Airtel Money—and digital wallet platforms including Neteller, Skrill, and AstroPay are regulated by BCEAO regulations. Refugees who hold officially recognised identity documents are generally able to meet KYC requirements and access these services. By contrast, asylum-seekers face significant barriers, as their temporary documentation is typically not accepted by mobile money providers and they often cannot satisfy proof-of-address requirements.

In May 2025, the BCEAO introduced new regulations requiring all digital payment service providers to obtain formal licensing. The implementation of this measure resulted in widespread service disruptions, significantly affecting the availability of digital financial services. These disruptions have disproportionately impacted vulnerable populations, including refugees and asylum-seekers.



Challenges and Practical Realities

Despite positive steps towards improving financial inclusion for refugees in Niger, regulatory and practical barriers persist, particularly for asylum-seekers. Limited awareness of the applicable legal and regulatory framework among financial institutions, combined with stringent KYC requirements, often leads to inconsistent acceptance of refugee identity cards and frequent rejection of the temporary documentation held by asylum-seekers.

Additional constraints arise from rigid requirements related to proof of address and proof of income, which are especially difficult to meet for individuals living in informal or temporary accommodation, without stable housing, or relying on informal sources of income.

Access to financial and mobile services is further affected by service disruptions linked to the introduction of new BCEAO licensing requirements, as well as by infrastructure limitations—particularly in rural areas and informal settlements—further constraining effective financial inclusion for both refugees and asylum-seekers.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Nigerien authorities and financial regulators have taken positive steps to support the financial inclusion of refugees. These include the explicit recognition of refugees' right to access financial services under Law No. 97016, as well as the introduction of the “favouritism” scheme, which enables individuals without formal identification documents to access SIM cards and mobile services through a guarantor.

NIGERIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

123,923 / 15,115 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

83,005, of which 27,362 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Nigeria is a State party to the 1951 Refugee Convention and its 1967 Protocol and has enacted domestic legislation to give effect to these instruments. The *National Commission for Refugees, Migrants and Internally Displaced Persons Act, 2022*—published in the Official Gazette on 30 January 2023—provides the legal framework for refugee protection and assistance in Nigeria.

There are no explicit legal provisions preventing refugees or asylum-seekers from accessing financial services. Access for refugees has improved notably following their eligibility to enrol for a National Identification Number (NIN) using documentation issued by the National Commission for Refugees, Migrants and Internally Displaced Persons (NCFRMI), including Refugee Certificates, Refugee Identity Cards, and Refugee Factsheets. Refugees who obtain a NIN are able to register SIM cards and access formal financial services, including bank accounts, mobile money, and digital wallets.

These improvements do not extend to asylum-seekers. Documentation issued to asylum-seekers is not explicitly recognised for NIN enrolment, which significantly constrains access to financial and mobile services. In practice, asylum-seekers are generally able to open bank accounts only if they hold a valid passport or if a financial institution agrees to accept an asylum-seeker certificate as valid identification, which remains uncommon. Asylum-seekers are also unable to register SIM cards in their own names, effectively excluding most from mobile money and digital financial services.

It should be noted that the regulatory language used by the National Identity Management Commission (NIMC) allows for a degree of interpretive flexibility. NIMC guidelines and related govern-

ment communications refer to “valid immigration documents” as acceptable for NIN enrolment. If asylum-seeker certificates were formally recognised or interpreted as falling within this category, asylum-seekers could potentially become eligible for NIN registration. However, this interpretation was not applied at the time of this research.

Nigeria also hosts a large population – over 3.5 million - of Internally Displaced Persons (IDPs). Although IDPs were not the primary focus of this research, it is noteworthy that, as Nigerian nationals, they face no legal barriers to accessing financial and mobile services. They are eligible for a NIN and can generally meet KYC requirements, although they may still encounter practical challenges, particularly when replacing or renewing official documentation.



Financial and Digital Access for Refugees and Asylum-seekers in Nigeria

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seeker certificates are not recognised for NIN enrolment, which in most cases prevents access to bank accounts.
Registering SIM Cards	● No legal barriers.	● A National Identification Number (NIN) is a prerequisite for SIM card registration, effectively preventing asylum-seekers from registering SIM cards in their own name.
Opening Mobile Money Accounts	● No legal barriers.	● Same constraints as for bank account opening and SIM card registration, as asylum-seeker documentation is not recognised as valid identification.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Same constraints as for bank account opening and SIM card registration, with asylum-seeker documentation not recognised for KYC purposes.



Opening Bank Accounts

Nigeria's legal framework allows refugees to open bank accounts using identification documents issued by the Nigerian Immigration Service or other recognised government authorities. This is supported by the Central Bank of Nigeria (CBN) Customer Due Diligence Regulations (2023), which require financial institutions to accept such documentation for KYC purposes. Refugees may also use their Refugee Identity Card to obtain a NIN, which further facilitates access to banking services. At the same time, the regulations require financial institutions to apply enhanced monitoring based on individual risk profiles, which can result in additional scrutiny or delays in practice.

Asylum-seekers face more significant barriers. Their documentation is not recognised for NIN enrolment, limiting their ability to meet standard identification requirements. While some financial institutions may, on a discretionary basis, accept asylum-seeker certificates—particularly in the absence of a valid passport—this practice is not widespread or consistent. In addition, proof-of-address requirements for certain account types further constrain access for refugees and asylum-seekers who lack stable housing.



SIM Card Registration

SIM card registration in Nigeria is regulated by the Nigerian Communications Commission and the National Identity Management Commission. Since April 2022, possession of a NIN has been mandatory for SIM registration for both nationals and non-nationals. As a result, refugees who have obtained a NIN can register SIM cards, while asylum-seekers—who are not eligible for NIN registration—remain excluded.



Mobile Money and Digital Payments

Mobile money services in Nigeria are regulated by the Central Bank of Nigeria under the Guidelines on Mobile Money Services and the Regulatory Framework for Mobile Money Operators, which aim to promote financial inclusion and expand access to digital financial services. Mobile money operators such as OPay, Paga, PalmPay, and MTN MoMo enable users—particularly those without traditional bank accounts—to conduct basic financial transactions, while widely used digital wallets include eNaira, PalmPay, Paga, OPay, Moniepoint, and Firstmonie Wallet.

Access to these services is governed by the CBN's tiered KYC framework, which differentiates between basic low-documentation accounts, intermediate accounts requiring more formal identification, and full KYC accounts that require a Bank Verification Number and proof of address.

Since 2024, refugees who hold an NIN generally meet the requirements for Tier 2 accounts and are also eligible for Tier 1 accounts. By contrast, asylum-seekers are often unable to access even Tier 1 services due to the requirement of a registered SIM card. For example, the eNaira Bronze Wallet requires a registered phone number, which asylum-seekers are typically unable to obtain in their own name.

Challenges and Practical Realities

In practice, many refugees who hold government-issued documentation are able to access financial and mobile services, including bank accounts and SIM card registration. However, inconsistent implementation of applicable policies, limited staff awareness, and insufficient training among financial institutions and mobile money operators can delay or restrict access. Additional challenges include low levels of digital literacy, limited smartphone ownership, and insufficient awareness among refugees of their eligibility for NIN registration. Administrative inconsistencies across local offices of the National Identity Management Commission (NIMC), together with limited access to registration centres—particularly in remote or underserved areas—further complicate access in practice.

Asylum-seekers, whose documentation is not recognised for NIN enrolment, remain largely excluded from formal financial and mobile services.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

While Nigerian legislation does not contain provisions specifically dedicated to the financial inclusion of refugees or asylum-seekers, regulatory authorities—particularly the Central Bank of Nigeria (CBN)—have taken steps to promote inclusion through administrative guidance. In February 2021, the CBN issued a directive requiring financial institutions to accept Refugee Certificates and Refugee Identity Cards issued by NCFRMI for banking transactions. The CBN Customer Due Diligence Regulations (2023) further require financial institutions to accept Machine-Readable Travel Documents issued by the Nigerian Immigration Service or other recognised authorities, signalling a comparatively flexible approach to customer identification.

In 2024, the CBN, with support from the Alliance for Financial Inclusion (AFI), Enhancing Financial Innovation & Access, and UNHCR, conducted a study on the financial inclusion of forcibly displaced populations in Nigeria. The findings of this study are expected to inform future updates to Nigeria's National Financial Inclusion Strategy by identifying key barriers, guiding regulatory refinements, and supporting the development of tailored financial and livelihood solutions to enhance the integration of forcibly displaced populations into the formal economy.

RWANDA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

115,244 / 15,020 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

6,979, of which 949 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Rwanda is a State party to the 1951 Refugee Convention and its 1967 Protocol, as well as to the 1969 OAU Convention. The country maintains an enabling legal and regulatory framework that does not restrict refugees or asylum-seekers from opening bank accounts, registering SIM cards, or accessing mobile money services and digital wallets. In practice, however, barriers persist—particularly for asylum-seekers—due to inconsistent interpretation of identification requirements and difficulties in providing proof of residence.

UNHCR delivers financial assistance to refugees and asylum-seekers in Rwanda primarily through bank accounts, which enables access to the same range of financial services available to Rwandan nationals. Refugees generally experience higher levels of inclusion in the formal financial system, supported by initiatives such as the Equity Bank Rwanda pilot scheme and partnerships between UNHCR, financial institutions, and non-governmental actors.

For asylum-seekers, inclusion remains more constrained. While the National Bank of Rwanda (NBR) has introduced exceptions to facilitate subsistence payments, limited awareness among financial service providers and uneven implementation of identification policies continue to hinder effective access to financial services.

To further strengthen financial inclusion for both refugees and asylum-seekers, continued awareness-raising and capacity-building efforts among financial institutions are needed, alongside clearer and more consistently applied guidance on acceptable documentation requirements.



Financial and Digital Access for Refugees and Asylum-seekers in Rwanda

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Identification documents available to asylum-seekers, such as the Temporary Residence Permit (TRP), generally do not meet KYC requirements. Under the UN-HCR/WFP CBI Programme, Equity Bank Rwanda can open accounts for asylum-seekers using proof of registration.
Registering SIM Cards	● No legal barriers.	● Temporary Residence Permits are not formally recognised as valid identification for SIM card registration, although some vendors accept them in practice.
Opening Mobile Money Accounts	● No legal barriers.	● Similar to SIM card registration, Temporary Residence Permits may be accepted by some mobile money providers as alternative identification.
Opening Digital Wallets/Electronic Payment Accounts	N/A. No specific regulation governs digital wallets, although services such as Leaf are available in the country.	N/A



Opening Bank Accounts

Rwanda's AML/CFT framework requires individuals to present a valid form of identification—such as a refugee identity card or a valid passport—when establishing a relationship with a financial institution. For refugees, the government-issued refugee identity card, which is linked to the National Population Registry, is recognised as valid identification for banking purposes.

For asylum-seekers, access is more complex. In addition to valid identification, banks often request proof of address, work permits, or residence permits—documents that are difficult for asylum-seekers to obtain in practice. However, under the UNHCR/WFP Joint Cash-Based Interventions (CBI) Platform, asylum-seekers receiving cash assistance are able to open accounts at Equity Bank Rwanda using proof of registration as acceptable identification. To facilitate this process, bank staff are deployed to refugee settlements to collect biometric data directly from applicants.

Microfinance institutions and savings and credit cooperatives (SACCOs) are also subject to AML/CFT requirements, but enforcement tends to be less stringent in practice. SACCOs operating in refugee-hosting areas often accept proof of registration as sufficient to open a basic account, providing a more accessible entry point for asylum-seekers and other displaced individuals.



SIM Card Registration

Refugees in Rwanda can register SIM cards using their refugee identity card or a valid passport, both of which are linked to the national digital identification system managed by the National Identification Agency (NIDA).

Asylum-seekers face greater challenges. To register a SIM card, they are required to undergo biometric verification, since their Temporary Residence Permits are not formally recognised as valid identification for this purpose. In practice, however, many asylum-seekers are still able to register SIM cards, suggesting that some vendors accept alternative documentation, such as proof of residence or proof of registration, on a discretionary basis.



Mobile Money and Digital Payments

Under Article 9 of the *Electronic Money Issuers Regulation No. 54/2022*, mobile money service providers in Rwanda are required to conduct customer due diligence before opening an account. Applicants must hold a registered SIM card and provide either a passport or a National Identification number verifiable through the National Population Registry—requirements that refugees are generally able to meet using their recognised identity documents.

Asylum-seekers face greater challenges. However, similar to SIM card registration practices, some mobile money providers accept proof of residence or proof of registration as alternative forms of identification in practice, although this is not applied consistently across providers. MTN and Airtel are the main mobile money operators in Rwanda.

In March 2025, the National Bank of Rwanda and the Capital Market Authority introduced a draft regulatory framework for virtual assets and related service providers. This initiative aligns with Rwanda's broader policy objective of promoting digital payments and advancing towards a cash-less economy.



Challenges and Practical Realities

The main challenge for refugees and asylum-seekers in Rwanda lies in the inconsistent implementation of KYC and identification requirements. For asylum-seekers, Temporary Residence Permits are frequently rejected, while refugee identity cards may not be accepted due to validity concerns or system-compatibility issues. These barriers appear to stem less from the regulatory framework itself and more from limited awareness and uneven application of rules among frontline staff of financial service providers.

At the same time, partnerships between UNHCR, WFP, and financial institutions—particularly through the Cash-Based Interventions Programme—have improved acceptance of refugee and asylum-seeker documentation for basic transactional bank accounts. Remaining gaps relate primarily to access to more advanced financial products, such as credit, which typically require additional eligibility criteria, including collateral and formal income verification.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Beyond the waiver issued by the National Bank of Rwanda allowing refugees and asylum-seekers receiving assistance to open bank accounts, the government and financial regulators have taken additional steps to promote financial inclusion. These efforts include the integration of refugees into the national digital identification system, the promotion of digital payments and mobile financial services, and the extension of financial regulations to explicitly cover non-citizens.

While Rwanda's National Financial Inclusion Strategy (NFIS) does not explicitly reference refugees or asylum-seekers, its objective of expanding access to financial services for vulnerable and underserved groups implicitly encompasses displaced populations.

SOMALIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
20,005 / 24,557 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
64,575, of which 13,126 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **MIXED**

Somalia is a State party to the 1951 Refugee Convention and its 1967 Protocol. Somalia's financial sector remains at an early stage of development, with regulatory frameworks for both banking and non-banking institutions—particularly the expanding microfinance sector—still evolving. While the use of traditional bank accounts remains very limited, mobile money and digital financial services dominate the market and serve as the primary means of payment and financial access nationwide.

For refugees and asylum-seekers, there are no explicit legal restrictions preventing access to banking services or mobile and digital financial platforms. In practice, however, access remains limited due to significant documentation-related barriers, particularly in relation to identification, proof of address, and compliance with KYC requirements.

UNHCR financial assistance mechanisms partially mitigate these constraints. More than half of refugees and asylum-seekers supported by UNHCR receive assistance through bank accounts, enabling access to formal financial services on similar terms to the host population. A smaller share receives transfers through mobile money platforms, which also facilitate basic transactions beyond humanitarian assistance.

In addition, some financial institutions—primarily microfinance providers—accept UNHCR-issued documentation, although this remains the exception rather than standard practice. UNHCR Somalia continues to engage with the Somalia Bankers Association and the National Commission for Refugees and IDPs (NCRI) to advocate for the recognition of refugee certificates as valid KYC documentation for banking and financial services. While progress has been made, broader and more consistent adoption of these practices remains pending.



Financial and Digital Access for Refugees and Asylum-seekers in Somalia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	No explicit legal restrictions, but significant practical barriers persist due to difficulties meeting identification and proof-of-address requirements.	No explicit legal restrictions; however, similar documentation barriers—particularly the lack of recognised ID and proof of residence—limit access in practice.
Registering SIM Cards	No explicit legal restrictions, but valid identification, proof of address, and biometric data are generally required, which many refugees struggle to provide.	No explicit legal restrictions, but documentation requirements frequently prevent asylum-seekers from registering SIM cards.
Opening Mobile Money Accounts	Access is constrained by the same documentation and KYC challenges encountered when opening bank accounts.	Access is constrained by the same documentation and KYC challenges encountered when opening bank accounts.
Opening Digital Wallets/Electronic Payment Accounts	Similar practical barriers as for bank accounts, combined with inconsistent provider policies.	Similar practical barriers as for bank accounts, combined with inconsistent provider policies.



Opening Bank Accounts

Somalia's legal framework permits refugees and asylum-seekers to open a range of bank accounts, including current (transactional), savings, fixed-deposit, and Islamic banking accounts. In practice, however, financial inclusion remains very limited due to the early stage of development of the country's financial sector. Bank account ownership remains extremely low—around 8 per cent of adults according to the 2014 Global Findex Survey and below 15 per cent in a 2020 UNIDO study, with fewer than 5 per cent actively using accounts. By contrast, mobile money usage exceeds 70 per cent of the population, and remains the dominant channel for financial transactions.

To open a bank account, applicants are typically required to provide valid identification—such as a national identity card, passport, or driver’s licence—alongside proof of address, an initial deposit, and a completed application form. Documentation issued by UNHCR is generally not accepted by commercial banks for KYC purposes.



SIM Card Registration

SIM card registration is governed by the *National Telecommunications Law* of 2017. To register a SIM card, individuals must provide a valid ID, photograph, biometric data, and a completed application form. In practice, refugees and asylum-seekers struggle to meet these requirements since their identification certificates are typically not recognised by telecom operators unless they also hold a valid passport.



Mobile Money and Digital Payments

Mobile money and digital wallets form the backbone of Somalia’s financial system, underpinning the vast majority of day-to-day transactions for both displaced populations and host communities. Their rapid expansion has been driven largely by the weakness of the formal banking sector and the prolonged absence of Somali shilling banknotes since 1991. Only in recent years have monetary authorities begun taking steps towards the reintroduction of physical currency.

Key mobile money platforms include EVC Plus (Hormuud Telecom), Sahal (Golis Telecom), ZAAD (Telesom), and EDahab (Dahabshiil). These services support person-to-person transfers, merchant payments, and bill payments, providing a critical alternative for individuals and households that remain excluded from formal banking services.





Challenges and Practical Realities

Refugees and asylum-seekers in Somalia face substantial obstacles to accessing formal financial services, primarily due to documentation gaps and strict KYC enforcement. Many are unable to provide the valid identification required to open bank or mobile money accounts. In response, some rely on informal arrangements—such as using registered SIM card holders as intermediaries or guarantors—but these practices are *ad hoc* and unreliable.

Access is further constrained by the limited inclusivity of available financial products. Remittance and credit services are rarely tailored to the needs and circumstances of refugees, and alternative forms of collateral are generally not accepted. Low levels of formal employment, limited entrepreneurship opportunities, and language or cultural barriers further reduce the capacity of refugees and asylum-seekers to engage meaningfully with formal financial systems.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Somalia does not have financial inclusion policies specifically targeting refugees or asylum-seekers; however, broader national reforms indirectly support inclusion for all residents. Key milestones include the finalisation of the National Payments System Bill in 2023 and ongoing efforts to strengthen the country's AML/CFT framework. Regulatory work is also under way to formalise oversight of the non-banking financial sector and to establish a national credit bureau, which could improve access to financial services over time.

In March 2025, the Federal Government of Somalia, with support from UNHCR, launched the issuance of identification cards for refugees and asylum-seekers. This initiative aims to strengthen legal protection and facilitate access to essential services, including financial services. The Government has engaged in broad consultations with private-sector financial actors to raise awareness of the new identification framework and to address KYC-related barriers, although consistent uptake across the financial sector remains a work in progress.

UGANDA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

1,887,594 / 39,990 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

135,475 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Uganda is a State party to the 1951 Refugee Convention and its 1967 Protocol. The country has established a comprehensive and progressive legal and regulatory framework under the *Refugees Act* (2006) and the *Refugee Regulations* (2010), which enables refugees and asylum-seekers to move freely, work, establish businesses, own property, and access essential services, including financial services.

In line with the National Financial Inclusion Strategy (NFIS) 2023–2027—which explicitly identifies refugees and asylum-seekers as a priority group entitled to safe, affordable, and quality financial services—the Bank of Uganda (BoU) has formally recognised refugee identification documents for KYC compliance. These include Refugee Identity Cards and Attestation Letters issued by the Office of the Prime Minister (OPM).

As a result, refugees and asylum-seekers are legally entitled to open bank accounts, register SIM cards, and access mobile money and other digital financial services. In practice, however, several implementation challenges persist. These include delays in verifying Attestation Letters, limited awareness of the applicable framework among financial and telecommunications service providers, weak connectivity in remote refugee-hosting areas, and low levels of financial and digital literacy. Together, these factors continue to hinder effective, equitable, and consistent access to financial services.



Financial and Digital Access for Refugees and Asylum-seekers in Uganda

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

In Uganda, refugees and asylum-seekers are legally entitled to open and operate bank accounts. Financial institutions are required to comply with KYC obligations under applicable AML/CFT regulations, and Refugee Identity Cards and Attestation Letters issued by the Office of the Prime Minister (OPM) are formally recognised as valid forms of identification for this purpose.

In practice, however, implementation challenges persist. Verification delays and uneven awareness among bank staff can constrain access, particularly for asylum-seekers relying on Attestation Letters, which are more difficult to authenticate. These barriers are largely operational rather than legal in nature and stem from varying levels of familiarity with refugee documentation across financial service providers.



SIM Card Registration

There are no legal barriers preventing refugees or asylum-seekers from registering SIM cards in Uganda. The same KYC rules apply as in the banking sector, with both Refugee ID cards and Attestation Letters accepted by mobile network operators (MNOs). The registration process is in-person, standardised nationwide, and generally efficient.



Mobile Money and Digital Payments

Refugees and asylum-seekers in Uganda face no legal restrictions in accessing mobile money and digital wallet services. Once a SIM card has been registered, individuals can open a mobile money account without additional documentation, as OPM-issued Refugee Identity Cards and Attestation Letters meet KYC requirements.

Mobile money is the dominant financial channel in Uganda and is widely used for remittances, humanitarian assistance, and everyday transactions. UNHCR delivers a portion of its financial assistance through mobile money platforms, enabling refugees to meet basic needs in a secure and efficient manner. Digital wallets are subject to similar KYC requirements; however, uptake remains lower—particularly among asylum-seekers—due to limited digital literacy, low smartphone ownership, and poor internet connectivity in rural refugee-hosting areas.



Challenges and Practical Realities

Refugees and asylum-seekers in Uganda rely primarily on mobile money services, which are more accessible, faster to use, and require less documentation than formal banking services. Despite an inclusive legal and regulatory framework, practical challenges persist, notably delays in verification processes and inconsistent acceptance of Attestation Letters for asylum-seekers.

While Uganda has made considerable progress in encouraging financial institutions to recognise refugee documentation, refugees continue to be perceived as higher-risk borrowers by formal banks. Collateral-based lending remains prevalent in the banking sector, and many refugees lack the assets or credit history required to qualify for loans. Microfinance institutions tend to be more flexible, with some offering small unsecured loans to refugees; however, access to larger and more diversified credit products remains limited.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Government of Uganda has taken proactive steps to integrate forcibly displaced populations into the national financial ecosystem. The *Refugees Act* (2006) guarantees access to identification, while the Bank of Uganda has issued guidance encouraging financial institutions to apply simplified KYC procedures for refugees.

The inclusion of refugees and asylum-seekers in the National Financial Inclusion Strategy (NFIS) 2023–2027 reflects a strong policy commitment to their socioeconomic integration, with a particular emphasis on digitisation, access to credit, and the reduction of regulatory barriers.

In addition, the 2023 amendment to the Microfinance DepositTaking Institutions (MDI) Act introduced agent-banking provisions, enabling MDIs to partner with local agents to deliver financial services in remote and underserved areas. This reform has expanded access for displaced populations living outside urban centres and brought essential financial services closer to refugee-hosting communities.



ZAMBIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

82,007 / 11,157 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

12,997 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **TO BE DEVELOPED**

Zambia is a State party to the 1951 Refugee Convention and its 1967 Protocol. The Government of Zambia has taken significant steps to promote the financial inclusion of refugees. Since 2016–2017, in collaboration with UNHCR and UNCDF, regulatory adjustments have been introduced to enable the acceptance of refugee documentation for SIM card registration and compliance with banking and mobile money KYC requirements. In parallel, the National Financial Inclusion Strategy II (NFIS II) 2024–2028 identifies refugees as an underserved population, while Zambia’s Global Refugee Forum pledges in 2019 and 2023 emphasise broader legal documentation and socioeconomic inclusion within national systems.

This policy shift has been institutionalised through formal directives issued by the Bank of Zambia (BoZ) and the Zambia Information and Communications Technology Authority (ZICTA), which establish simplified KYC requirements for refugees. As a result, the Refugee Identity Card, Refugee Certificate, and Proof of Registration (PoR) are formally recognised as valid documentation for opening bank accounts and registering SIM cards. In many cases, the Refugee Certificate also functions as proof of address; where additional verification is required, financial institutions may request a supporting letter from the Commissioner for Refugees (COR).

These KYC flexibilities do not currently extend to asylum-seekers. Although refugees face no legal barriers to accessing digital financial services, asylum-seekers remain largely excluded, as their primary documentation—including the temporary Asylum-Seeker Permit—is not formally recognised under existing KYC regulations, and no binding regulatory guidance has been issued requiring its acceptance by commercial providers.

For former refugees, notably Angolan and Rwandan nationals under local integration programmes, the regulatory framework has evolved to recognise Alien National Registration Cards (NRCs) and valid passports with residence permits as standard, high-tier KYC documentation. This reflects a broader transition from humanitarian to civil registration systems. Despite this legal clarity, practical barriers persist. The requirement to obtain a valid national passport from the country of origin remains a major bottleneck for securing residence permits and, by extension, an Alien NRC. As a result, many former refugees experience a “documentation gap”, having exited refugee-specific systems without yet being able to access the civil documentation required for standard banking. While the National Refugee Policy (2024) seeks to address these inconsistencies, the transition to civil documentation remains a key challenge for the full financial inclusion of locally integrated populations.

UNHCR delivers financial assistance to refugees and asylum-seekers through Zambia’s national social protection delivery systems, using the same mobile money platforms and financial service providers that support the Social Cash Transfer (SCT) programme. This harmonised approach strengthens sustainability and supports the gradual integration of refugees into national social protection and financial systems.



Financial and Digital Access for Refugees and Asylum-seekers in Zambia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Asylum-seeker documentation is not formally recognised for KYC purposes, and asylum-seekers often do not possess a valid passport.
Registering SIM Cards	● No legal barriers.	● Required documentation is typically not accessible to asylum-seekers, and UNHCR-issued documents are not formally recognised for SIM registration.
Opening Mobile Money Accounts	● No legal barriers.	● Documentation requirements mirror those for SIM registration and banking, and UNHCR-issued documents are not formally recognised for KYC purposes.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Documentation requirements mirror those for SIM registration and banking, and UNHCR-issued documents are not formally recognised for KYC purposes.



Opening Bank Accounts

Following regulatory reforms led by the Bank of Zambia, with support from UNCDF and UNHCR, refugees are able to open bank accounts using refugee-specific documentation, including Refugee Certificates, Refugee Identity Cards, and Proof of Registration, all of which are formally recognised for KYC compliance. The Refugee Certificate is distinctive in that it includes a household block number, allowing it to function as both proof of identity and proof of address. Where additional address verification is required, financial institutions may request supplementary documentation, such as a supporting letter from the Commissioner for Refugees.

Access for asylum-seekers remains highly constrained. Their documentation is not recognised for KYC purposes, and they generally lack alternative forms of identification accepted by financial institutions, such as a valid passport. As a result, asylum-seekers are, in most cases, unable to open bank accounts and remain largely excluded from formal banking services.



SIM Card Registration

SIM card registration in Zambia is mandatory under the *Information and Communication Technologies (Registration of Electronic Communication Apparatus) Regulations*, Statutory Instrument No. 65 of 2011. Refugees are permitted to register SIM cards using refugee-specific documentation, including the Refugee Certificate, Refugee Identity Card, and Proof of Registration, all of which are formally recognised for this purpose.

Although asylum-seekers are not explicitly prohibited from registering SIM cards, access remains constrained in practice. The documentation typically required for foreign nationals—such as a valid passport or work permit—is often unavailable to asylum-seekers, which frequently prevents SIM card registration and, by extension, access to mobile and digital financial services.



Mobile Money and Digital Payments

Mobile and digital financial services in Zambia are regulated by the Bank of Zambia and the Zambia Information and Communications Technology Authority (ZICTA). Major mobile money providers include MTN MoMo, Airtel Money, and Zamtel Kwacha, while commonly used ewallets include Ekamo Wallet, Zazu Africa (ZazuPay), FNB eWallet, and Indo Wallet Banking.

As with banking services, refugees are able to open mobile money accounts and digital wallets using refugee-specific documentation recognised for KYC purposes. By contrast, asylum-seekers remain excluded, as documentation issued by UNHCR is not formally accepted for KYC compliance by mobile money providers.

In 2017, through a joint UNHCR–UNCDF initiative, financial assistance delivery in Meheba Refugee Settlement transitioned from cash-based distribution to digital payments. The programme was implemented through Standard Chartered Bank Zambia, in partnership with Airtel Money in Meheba and MTN Mobile Money in Mayukwayukwa, representing a key milestone in advancing digital financial inclusion for refugees in Zambia.

Challenges and Practical Realities

In practice, refugees in Zambia generally have access to SIM cards, mobile money, and digital wallets, supported by simplified KYC procedures. Access to bank accounts, however, remains uneven, primarily due to proof-of-address requirements that are more difficult to meet. By contrast, asylum-seekers experience persistent exclusion across financial services as their identity documents are not recognised for KYC purposes.

Additional barriers affecting both banking and mobile money access include low levels of financial literacy and limited awareness of available services, infrastructure and network constraints in rural refugee-hosting areas, and liquidity shortages among mobile money agents, which affect both refugees and beneficiaries of the Social Cash Transfer (SCT) programme.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Government of Zambia has made notable progress in promoting financial inclusion for refugees through sustained collaboration with UNHCR and UNCDF. [The National Financial Inclusion Strategy II \(NFIS II\) 2024–2028](#) explicitly recognises refugees as an underserved population and includes an action plan to assess the financial inclusion needs of both refugees and asylum-seekers. The strategy also prioritises the expansion of digital payment systems and the strengthening of consumer protection frameworks.

Refugee management is led by the Office of the Commissioner for Refugees (COR) under the Ministry of Home Affairs and Internal Security. COR has implemented a biometric registration system across the Meheba, Mayukwayukwa, and Mantapala settlements, as well as in urban areas such as Lusaka. In addition, COR has established self-service kiosks to improve access to information and documentation, facilitate communication with public authorities, and support functions such as appointment scheduling, feedback collection, and surveys related to living conditions and return intentions.





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