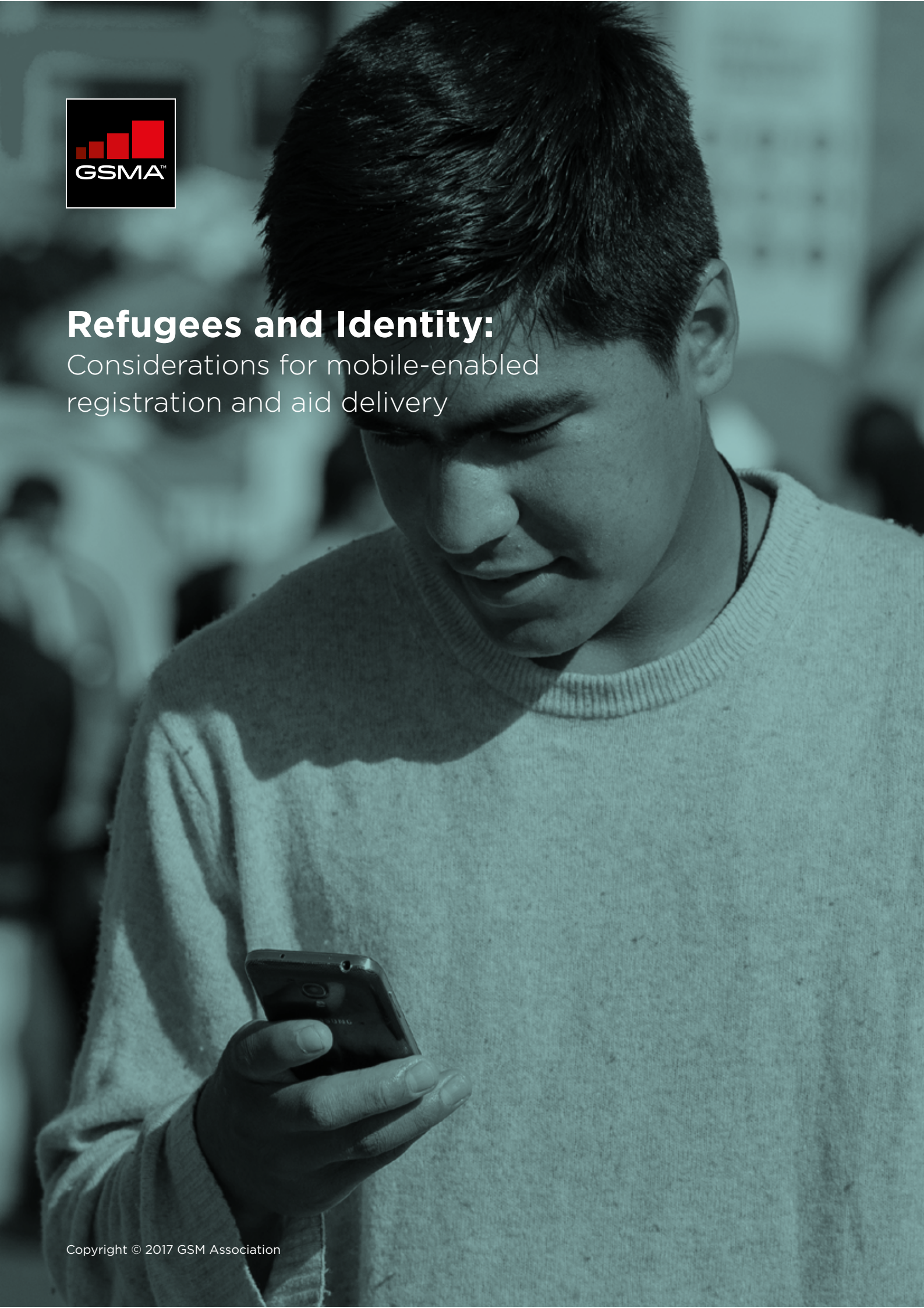


Refugees and Identity:

Considerations for mobile-enabled registration and aid delivery

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The GSMA represents the interests of mobile operators worldwide, uniting nearly 800 operators with almost 300 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and internet companies, as well as organisations in adjacent industry sectors. The GSMA also produces industry-leading events such as Mobile World Congress, Mobile World Congress Shanghai, Mobile World Congress Americas and the Mobile 360 Series of conferences.

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This document is an output of a project funded by UK aid from the Department for International Development (DFID), for the benefit of developing countries. The views expressed are not necessarily those of DFID.

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1 Introduction

An unprecedented and ever-increasing number of people were forced to leave or flee their homes due to conflict and persecution in 2016, with the global displaced population reaching nearly 64 million by mid-year[1]. Over 21 million of the displaced are refugees[2], who traversed international borders to escape considerable physical, economic and social hardships such as new and unresolved conflict, human rights violations or persecution. Having left behind their home, livelihoods, possessions and social networks, these refugees must rely on their host government, the United Nations High Commissioner for Refugees (UNHCR) and the international community to ensure that they are able to live in safety and have access to vital support and assistance.

1. 'Mid-Year Trends 2016', UNHCR, February 2017. Available at: www.unhcr.org.
2. Refugees are defined and protected under international law, and the United Nations High Commissioner for Refugees (UNHCR) is mandated to respond to refugee needs. An 'asylum seeker' is someone who is seeking international protection but whose application for refugee status has not been decided.

It is within this context that the GSMA has been researching how digital technology, especially mobile, can be leveraged to support both refugee populations and the organisations that are working to serve them. Numerous examples have already been documented in our Refugee and Connectivity Portal[3] - from the Instant Network Schools in Tanzania which enable young refugees and teachers to access digital educational content and the internet, to online databases that harness the power and scale of mobile to help facilitate family reunification. A recent landscape report by the GSMA's Disaster Response and Mobile Money programmes, *'Mobile Money, Humanitarian Cash Transfers and Displaced Populations'*[4] , has also examined the use of mobile money-enabled humanitarian cash transfers to support displaced populations, examining case studies in Haiti, Rwanda and Pakistan.

An area of increasing focus is the opportunity for mobile and digital technology to play a role in establishing unique, digital identities for refugees. In Section III of this report we explore the refugee registration and identification processes that are typically employed by host governments and UNHCR, highlighting where digital innovations are making registration more efficient, improving cross-organisational data sharing, and establishing digital identities that can be verified anytime, anywhere. It is clear that there are emerging opportunities for mobile network operators (MNOs) and mobile technology to play a vital role in this space; for instance, by developing mobile applications that facilitate data collection and information sharing, or enabling authorities to accurately and remotely verify a refugee's identity documents or eligibility status.

Innovations in mobile technology have also brought about a shift in the way humanitarian organisations deliver aid to refugees. Cash transfers are increasingly used as a modality for delivering aid, and cash-based interventions (CBIs) dispersed via mobile money platforms have been found to deliver a number of benefits to beneficiaries, the humanitarian sector and the wider ecosystem[5]. However, it is critical to recognise that in most refugee-hosting countries, MNOs are now subject to mandatory SIM registration obligations which require customers to present an approved identity document before a SIM card or mobile money service can be activated. Displaced populations may, especially at the outset of their displacement, lack the identity documents required to pass KYC criteria; this means that in markets where humanitarian-issued IDs are not accepted for KYC purposes, and asylum seekers and refugees face challenges or delays obtaining a government-issued ID, opportunities for MNOs to offer both basic and value-adding mobile services can be restricted. In Section IV of this report we explore the issue of mobile KYC in refugee areas in more detail, showing how contrasting regulatory environments in Kenya and Iraq have shaped the type of mobile financial services provided by MNOs and humanitarian organisations.

3. See: https://www.gsma.com/refugee-connectivity/
4. 'Landscape Report: Mobile Money, Humanitarian Cash Transfers and Displaced Populations', GSMA, May 2017.
5. ibid

2 Refugees and Identity in Context

The total number of refugees has increased 'significantly and consistently' over the past five years, from 10.4 million at the end of 2011 to 16.5 million by the middle of 2016[6]. Furthermore, the number of refugees that are able to return to their home country remains relatively low, suggesting that many of the displaced – including large numbers from Syria, Afghanistan, Somalia and Sudan – will continue to live in exile for many years to come.

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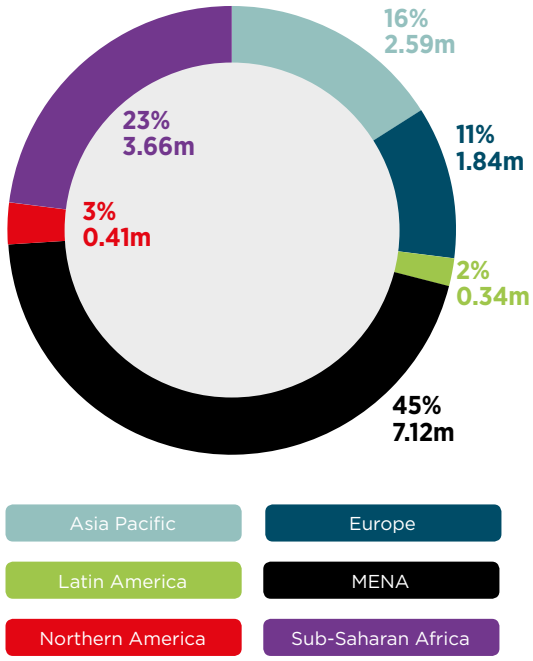
While much attention has focused on the refugees arriving in Europe and North America, the overwhelming majority of refugees – nearly nine in ten – are being hosted by developing countries. Sub-Saharan Africa is home to nearly one quarter of the world's refugee population, with 80 per cent of the refugees in this region originating from one of five countries: Somalia, South Sudan, Sudan, the Democratic Republic of the Congo (DRC) or the Central African Republic (CAR). Kenya currently hosts nearly half a million refugees[7], and following election-related violence that began in April 2015, an estimated 325,000 refugees from Burundi have streamed into neighbouring countries such as Tanzania, Uganda and Rwanda[8].

Across the Middle East and North Africa, large refugee flows have been fuelled by ongoing conflicts in Syria, Yemen and parts of Iraq. Over five million Syrians have become refugees since the outbreak of civil war in 2011[9], with almost three million fleeing to Turkey.

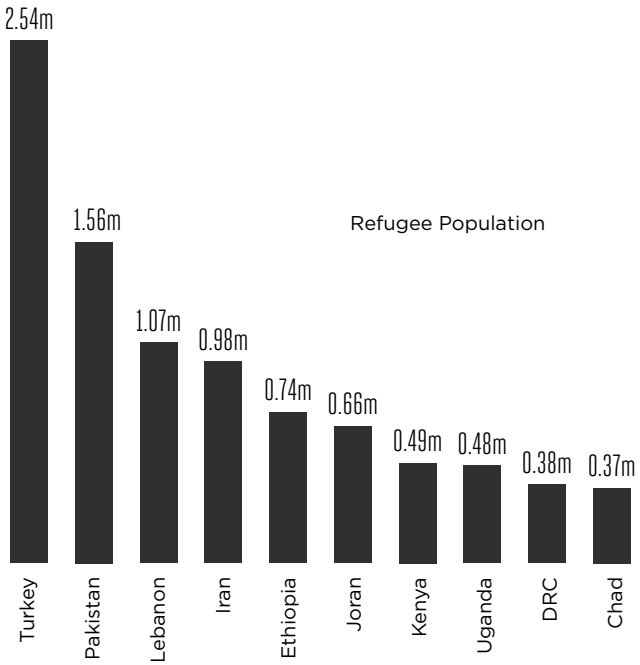
6. 'Mid-Year Trends 2016', UNHCR, February 2017. Available at: www.unhcr.org.
7. See: http://www.unhcr.org/ke/figures-at-a-glance
8. See: https://www.unicef.org/appeals/burundian_refugees.html
9. 'Syria refugee crisis: Facts you need to know', World Vision, 13 April 2017.

Where the world's refugees are being hosted

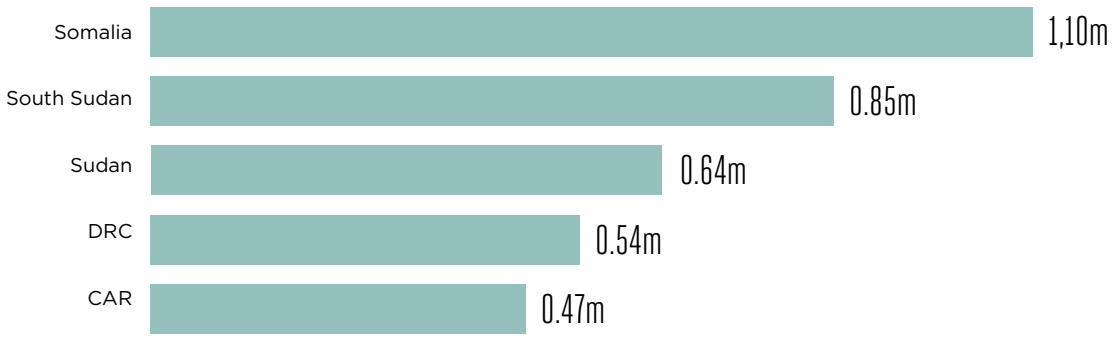
Per cent of Refugee Population, by Region



Top Ten Refugee Hosting Countries



Over 80 per cent of the refugees in Sub-Saharan Africa originate from one of five countries



Source: UNHCR 2016 mid-year statistics



Due to the extreme circumstances under which they are forced to flee their homes, refugees and asylum seekers are less likely than other migrants and foreign nationals to possess a proof of identity from their country of origin. Identity documents can be forgotten, lost, destroyed or stolen during a refugee's journey, and those who are fleeing persecution based on some aspect of their identity (e.g. nationality, religion, ethnic group or political affiliation) might make a decision not to travel with documentation. Since the start of the civil war In Syria, it has become nearly impossible for citizens to replace or apply for new identity documents. Those who fear political persecution are unable to approach government authorities, and many citizens applying from abroad have had their applications denied. More recently, non-state actors (such as the so-called Islamic State) have made concerted efforts to destroy the passports and legal records of Syrian citizens[10].

In many cases, refugees originating from poor, vulnerable, or disconnected segments of society will have never owned identity documents. This could be because they were never incentivised to own one, the application process was too costly or inconvenient, or their government lacked the capacity to issue identity documents to its citizens. For example, it is presumed that in Somalia few citizens have the means to obtain passports or national identity documents, largely due to the fact that in order to procure one a person must travel to Mogadishu, undergo a criminal reference check, and pay a fee of US $12.50[11]; a prohibitive cost for most citizens. Furthermore, it has been found that in practice national identity cards are rarely used or needed by Somalis, and typically only serve as a precursor for obtaining a passport[12].

The hardships faced by refugees and asylum seekers are compounded in the absence of identity documents. Those travelling without an ID are likely to face barriers or delays when attempting to cross international borders and when registering with authorities and/or humanitarian organisations. Once in their host country, those without recognised identity documents or proofs of residency will have limited freedom of movement and will be at a much greater risk of being detained or, in some cases, expelled back to the country from which they fled. Studies have also shown that undocumented refugees are less likely to report when they have been abused or exploited due to fear of being arrested or deported[13]. Over time, a lack of identity documents will make it difficult or impossible for a refugee to access a wide range of services such as mobile connectivity, financial services, education, health care or employment; only the most basic services are likely to be provided in the absence of identification[14].

10. 'The loss of a nation', The Economist, 23 October 2014.
11. See: https://www.ecoi.net/local_link/322151/447883_en.html
12. ibid
13. E. Fiddian-Qasmiyeh, G. Loescher, K. Long and N. Sigona, 'The Oxford Handbook of Refugee and Forced Migration Studies', OUP Oxford, 2014.
14. Manby, Nonie Bronwen, 'Identification in the context of forced displacement', World Bank, 2016.

3 The Registration And Identification Of Refugees And Asylum Seekers

The 1951 United Nations Convention relating to the Status of Refugees and its 1967 Protocol, together, remain the cornerstone of refugee protection, and the only global legal instruments that cover the most important aspects of a refugee's life[15]. In addition to outlining the rights of refugees and those seeking asylum, the Convention lays out the obligations of the 148 Sates that are party to one or both of these instruments, including an expectation that each State will cooperate with UNHCR to ensure that refugees in their territories are appropriately respected and protected.

Under the Convention, it is ultimately the responsibility of the State to register refugees, provide statistical data on their condition (Article 35), and issue identity papers to those without valid documentation (Articles 27 and 28). In circumstances where a State lacks the necessary resources, capacity or will to perform these functions according to international standards, UNHCR has a mandate to provide technical or financial support and advice, or even take full responsibility for the registration and identification processes. In all refugee situations, UNHCR works with the government and other partners to agree on how the registration process will be managed, how identity documentation will be produced and issued, and how refugees' data – such as personal names, place names, and personal documents – will be collected and recorded.

15. The 1951 United Nations Convention relating to the Status of Refugees and its 1967 Protocol, UNHCR, September 2011



In practise, the process through which refugees and asylum seekers are registered and issued identity documents, and their ability to use these documents to gain access to humanitarian, public and private-sector services, is extremely contextual and can vary significantly by country and region. Broadly speaking, however, these processes can be grouped into three categories:

HOST GOVERNMENT-LED	JOINT-LED	HUMANITARIAN AGENCY-LED
Prevalent in high-income countries	**Prevalent in developing countries**	**Prevalent in some developing and many Least Developed Countries (LDCs)**
Host government provides required support, including documentation and durable solutions Government-issued ID is used to access various services Humanitarian agencies play a limited role, mostly around maintaining population records, but step in to provide a proof-of-identity where this is required	Refugee registration is a joint effort between the host government and humanitarian agencies, either for the entire process or for a specific area in which external assistance is required Government issued ID is recognised by local authorities Humanitarian agencies' ID may or may not be recognised	Host government lacks the capacity and resources to provide ID and support to international standards Humanitarian agency ID is a vital and, in some cases, sole proof of identity Humanitarian agencies play a bigger supporting role to the host government in the resettlement of displaced persons

Registering Refugees and Asylum Seekers

Registration is an essential process through which each individual's information is recorded, verified, and continuously updated. In addition to documenting every refugee and asylum seeker's presence, registration plays a crucial role in identifying an individual's needs, aiding in the reunification of families, ensuring access to basic services and assistance, managing humanitarian resources, and providing host governments with the information they need to find durable[16], long-term solutions for each refugee.

Although certain aspects of the registration process will vary by country and by situation, UNHCR has developed a standardised (or 'unified') approach to registration that has been outlined in their 2003 *Handbook for Registration*[17]. These processes have been designed with a recognition that asylum seekers may have limited or no access to identity documents at the initial stage of registration, and in most cases UNHCR and the host government will not be able to ask authorities in the country of origin to verify individual details.

Registration begins with the collection of basic demographic data such as the individual's name, date of birth, gender, and country of origin, as well as the details of any identity documents, if available. Increasingly, UNHCR is also collecting biometric data – including photographs, fingerprints and iris scans – as a regular part of the refugee registration and verification process. In a refugee context, digital identities that are underpinned by biometrics can help to ensure that refugees are only registered once, they allow identities to be verified in the absence of physical documents that are easily lost or stolen, and they make service delivery more efficient. In Jordan, UNHCR has also found that in instances where refugees are authenticated for food distribution using biometrics, third parties such as banks, supermarkets and health centres are able to confirm their eligibility without seeing any personal data, allowing refugees to access assistance with increased dignity and safety[18].

Over time, face-to-face interviews are used to strengthen an individual's registration by allowing authorities to cross-check and verify their information and build a fuller picture of their circumstances, employment, education, and all aspects of their history. Standardised registration forms have been designed by UNHCR to ensure that a complete set of information is collected from every individual and household; when the registration form is complete, each refugee will have a single, unique registration record that will contain the information needed to provide them with protection and assistance. The core registration information is made available to UNHCR staff for as long as the refugee remains displaced, and authorised users – protection officers, other UNHCR offices, operational partners, or host government officials – can add data to the record as needed.

UNHCR has been using the proGres electronic registration and case management system since 2004 to facilitate the continuous registration of refugees and to digitally record every individual's personal details and photographs. ProGres is currently used in more than seventy countries, where it provides a comprehensive breakdown of the refugee population according to sex, age group and ethnic background, as well as location information for those in urban areas. In places where registration is jointly led by the government and UNHCR, as is the case in Kenya, government authorities can be given access to the proGres system in order to manage functions related to registration, refugee status determination (RSD) and voluntary repatriation. The newest version of proGres, which has been deployed in twenty-five countries to date, includes a web-based, centralised database that is globally accessible to UNHCR.

In 2015 UNHCR launched a new Biometric Identity Management System (BIMS), which is used to digitally collect and store asylum seekers' fingerprints, iris data and facial images. Once an individual's data is collected, it is encoded into a personal ID which can be used throughout UNHCR facilities, allowing staff to verify a person's identity or eligibility in as little as five seconds[19]. The platform is currently in active use across twenty-eight countries and is being progressively rolled out to new locations. Including its legacy biometric systems, UNHCR is now using biometrics to support the identification and protection of four million people across forty-six countries, and has further committed to expand the usage of biometrics to more than seventy-five country operations by 2020.

16. 'Durable solutions' are those which enable refugees to live in safety and rebuild their lives; UNHCR attempts to secure one of three durable solutions for refugees around the world: local integration, resettlement or voluntary repatriation.
17. Available at: http://www.refworld.org/pdfid/3f967dc14.pdf
18. 3RP Regional Refugee & Resilience Plan 2017-2018, available at: http://data.unhcr.org/syrianrefugees/country.php?id=103
19. 'Biometric Identification in Refugee Camps', Borgen Project, 27 October 2016.

Improving Registration Activities through Mobile

Although host governments and UNHCR typically rely on the use of laptops fitted with the proGres/BIMS system for registration, mobile applications have the potential to play a significant role in data collection. When registering personal details, or conducting structured interviews and surveys, many humanitarian organisations have found that collecting data on smartphones, rather than on paper, reduces errors and allows the interview process to be more structured[20]. Several MNOs already have experience developing mobile applications that digitise data collection forms – for instance, in countries such as Pakistan, Tanzania and Ghana, MNOs have successfully developed mobile birth registration applications that have made data collection and registration more efficient, cost-effective, and accessible[21]. Similarly, a joint initiative between UNHCR, the UN Office for the Coordination of Humanitarian Affairs (OCHA), Harvard Humanitarian Initiative (HHI) and other agencies has led to the development of the KoBo Toolbox – a free, open-source tool for mobile data collection that allows organisations to collect data in the field using mobile devices such as mobile phones or tablets[22]. KoBo Toolbox has been designed to make electronic data collection more standardised, more reliable, and easier to use in humanitarian crises, and additional features continue to be added to the software to make the suite of products more useful and relevant to a growing number of people.

UNHCR has also found that organisations are better equipped to carry out communication and registration activities when refugees have access to mobile devices. At the Za'atari refugee camp in Jordan, UNHCR distributes SIM cards to all incoming Syrian refugees and records each of their individual phone numbers in their database. Group SMS messages can then be used to ask individuals to update or verify their personal details, or to track refugee movements and maintain communication with those who have left refugee-designated areas. A 2014 SMS exercise, for instance, helped reveal that 15,000 fewer refugees remained in the camp than UNHCR had been estimating; it also showed that many refugees had discarded the UNHCR-provided SIM and had obtained another one on their own[23].

The high penetration of smartphones in the Za'atari camp also allows humanitarian organisations to disseminate important information through social media platforms such as Twitter and Facebook. Trulioo, a global company specialising in ID verification and analytics, believes that the use of social media among refugees – both before and after they leave their country of origin – provides MNOs with an opportunity to serve as centralised, cross-border verifiers of identity by harnessing the user data and transaction histories linked to specific SIM cards[24]. By aggregating information on an individual's online interactions, MNOs could help verify individual's identities, establish alternative 'cyber identities', or establish credit histories that would help open doors to financial inclusion.

20. Favell, Andy, 'How technology is helping deliver aid to Syrian refugees in the Middle East', Computer Weekly, October 2015.
21. 'Innovations in Mobile Birth Registration: Insights from Tigo Tanzania and Telenor Pakistan', GSMA, 2016.
22. See: http://www.kobotoolbox.org
23. http://www.unhcr.org/innovation/labs_post/social-media-and-sms-outreach/
24. Reicke, Jeffrey, 'Refugees and Humanitarian Assistance: Which Kind of Aid Is Best?', Center for Financial Inclusion, 14 February, 2017.



Providing Identification for Refugees and Asylum Seekers

After the initial stage of registration has been completed, government authorities and/or UNHCR will ensure that asylum seekers hold provisional documentation that attests to the fact that an application for refugee protection has been submitted. This certificate will be vital for accessing humanitarian assistance and protecting the individual against arbitrary arrest or deportation (known as 'refoulement'[25]) while they wait for their refugee status to be confirmed. However, the asylum seeker's ability to access non-humanitarian services with this document will often be limited.

In most countries where the registration process is government-led, and in many of the countries where registration is managed jointly with UNHCR, once an individual has been granted refugee status they will receive a government-issued certificate or identity card that corresponds to (i.e. looks and feels similar to) those issued to other citizens and residents. This identity document serves as evidence of the individual's legal status, but the rights which flow from that status can vary significantly by country. In many places, however, these documents will enable a refugee to access a range of public and private services for the first time, including mobile services.

In those countries where UNHCR has taken responsibility for registration, a refugee will tend to receive a certificate that shows they are regarded as a refugee within UNHCR's mandate. Although UNHCR "mandate certificates" typically have no legal force, in certain countries the authorities have agreed that refugees holding these documents will be granted certain rights or even residency[26]. In Pakistan, for example, UNHCR-issued Proof of Registration cards can be used on a temporary basis as proof-of-identity, allowing refugees to enjoy access to services and freedom of movement across the country.

25. See Article 33 of the 1951 Convention
26.'Identity Documents for Refugees (EC/SCP/33)', UNHCR, 20 July 1984.



Strengthening Identification through Mobile

In June 2016, UNHCR in Malaysia began issuing photo-ID cards that can be scanned and verified using a free mobile application called 'UNHCR VERIFY-MY'. The mobile application allows anyone, including law enforcement officials and other authorities engaged in UNHCR's protection work, to scan a QR code on the back of the ID and visually verify the card holder against the personal details and photograph displayed on the mobile device's screen. Refugees can also use the app to scan their unique ID card and verify that the card they hold is genuine, has not been tampered with, and has not been duplicated. UNHCR has found that this innovative use of technology has added credibility to UNHCR ID cards in the eyes of law enforcement and government in the region. Mobile devices are also being used by UNHCR staff in Jordan to scan the barcodes found on refugees' identity documents and verify whether they are eligible for a range of services, such as food, clothing, or cash aid. Unlike 'UNHCR VERIFY-MY', individual names and pictures do not appear on the mobile application used in Jordan, as this is not necessary to confirm an individual's eligibility status[27].

There are also ongoing efforts to explore how new technologies, such as blockchain[28], can help refugees access services or establish alternative, functional identities. Through their Building Blocks initiative, the World Food Program (WFP) has tested opportunities to leverage blockchain to make their cash-based transfer operations faster, cheaper and more secure. In Jordan and Pakistan, Building Blocks uses a smartphone interface to allow WFP personnel to authenticate and record the transactions made when vulnerable families received their food or cash assistance. This ensures that disbursements are reaching the intended beneficiaries, and also helps WFP track and verify how families are using these funds.

In the Dadaab refugee camp in Kenya, the blockchain platform BanQu is helping displaced Somalis access financial products and other formal services by creating new, 'economic identities'. BanQu's platform allows an individual's photographs, key physical characteristics, and biometrics to be uploaded to a secure ledger as their identity, and builds on this information by linking it to the individual's financial transactions, life events (birth registration, health history, education), government and banking records, property, and other important assets[29]. A refugee can access the BanQu app using a mobile phone, similar to logging onto Facebook, and then connect with family members and other social connections who help to validate their information.

27. Parker, Ben, 'Aid's cash revolution: a numbers game', IRN News, 2 November 2016. Note that this is in line with UNHCR's Data Protection Policy, which ensures that the organisation releases the minimum amount of data required for a specific purpose.
28. Blockchain facilitates secure record keeping in online community ledgers, where approved members can share and confirm information across devices; see for instance: 'Blockchain technology can help save the lives of millions of refugees by giving them a verified identity', Quartz, 18 October 2016.
29. ibid

Harmonising Refugee Databases

In addition to the host government and UNHCR, many other humanitarian agencies and non-government organisations (NGOs) – for example WFP and the International Committee of the Red Cross (ICRC) – establish their own functional databases for refugees, mainly to verify and authenticate the beneficiaries of their humanitarian assistance programmes. Increasingly, these organisations are working together, and with UNHCR, to ensure that asylum seekers and refugees are provided with basic services and food assistance. This is often facilitated by sharing refugees' information or by harmonising beneficiary databases. For instance, in many locations UNHCR is able to support the targeted delivery of cash and in-kind interventions for organisations such as WFP and the UN Children's Fund (UNICEF) by providing the organisations with a limited set of refugees' personal data, such as their contact information, biographical details and needs assessment information.

In line with their Policy on the Protection of Personal Data[30], UNHCR only transfers a refugee or asylum seeker's data after the individual has given their explicit consent, and they only release the minimum amount of data necessary for a given purpose. In addition to UNHCR, a number of actors are working to create standards and guidelines that promote privacy and data protection in a consistent way to enable the delivery of digital services to refugees. The World Economic Forum's Principles on Public-Private Cooperation in Humanitarian Payments, and the World Bank Principles on Identification are two examples.

Digital technology is currently playing a critical role in the Syrian refugee response by helping at least 200 organisations across five countries improve the way they share information and coordinate aid efforts. Before the launch of UNHCR's Inter-Agency Information Sharing Portal and Refugee Assistance Information System (RAIS) in Jordan, humanitarian organisations often found that refugee case files were scattered and divided between various paper documents and Excel sheets; refugees were registered multiple times (as different beneficiaries, by multiple NGOs); and refugees had to wait longer than necessary before obtaining assistance because it was unclear what they had previously received[31].

Today, RAIS (which is complimentary to ProGres) provides an online, central database on refugee assistance that allows UNHCR and hundreds of implementing and operational partners to keep track of all assistance provided to refugees and update this information automatically. The database features ten modules, including a smart search function to find and check refugee profiles; an improved referral system to facilitate communication between partners; an enhanced reports system for keeping track of assistance; data collection via mobile so that information gathered during house visits can be uploaded immediately; and a service to manage the appeal for refugee assistance. The system has been rolled out in Jordan, Egypt and Lebanon, allowing partners to help provide coordinated services to over 1.6 million displaced people. While RAIS has been developed and deployed for the MENA region, many of the same functions have been incorporated in the newest version of proGres.

30. See: http://www.refworld.org/pdfid/55643c1d4.pdf.
31. 'Refugee Assistance and Information System', at: http://www.unhcr.org/innovation

4 Refugees and Mobile KYC

Although some refugee crises are quickly resolved, today at least 6.7 million refugees are involved in protracted humanitarian situations. In fact, data from UNHCR shows that 41 per cent of refugees under UNHCR's mandate are estimated to have been in exile for at least five years, with many forcibly displaced for over two decades[32]. In this context, it is increasingly important that governments, humanitarian organisations and the private sector work together to develop durable solutions for refugees that enable them to live in safety and rebuild their lives.

Key to this is providing refugees with access to mobile services, which are increasingly seen to be critical for maintaining contact with friends and family in home countries, accessing vital information, facilitating cash payments (including remittances and various forms of cash aid) and re-establishing a livelihood. For many refugees, mobile devices are regarded as a core survival tool; UNHCR has found that after paying for housing, refugee families in Jordan spend 10 to 20 per cent of their cash distributions on mobile connectivity, prioritising it over many other day-to-day needs. Similarly, in Tanzania refugees often sell a portion of their monthly food rations in order to purchase airtime for their mobile phones[33].

Innovations in mobile technology are also transforming how humanitarian organisations deliver aid to refugees. The shift towards providing refugees with assistance through direct cash transfers – particularly in protracted crises – provides MNOs with an opportunity to play a critical role in the humanitarian space by delivering value-adding mobile services such as mobile money and other low-cost mobile payment solutions. GSMA has highlighted that many humanitarian organisations are already dedicating substantial resources to projects that leverage mobile money platforms to provide refugees with digital financial services, including cash assistance[34]. Many actors, including the Word Economic Forum, WFP, the International Rescue Committee and the Bill and Melinda Gate Foundation are advocating that significant scope exists for the private sector to scale their collaboration with governments and development organisations in order to deliver digital cash payments to refugees[35].

32. Pistelli, Micol, 'Removing Barriers to Expand Access to Finance for Refugees', Microfinance Gateway, March 2017.
33. 'Connecting Refugees: How Internet and Mobile Connectivity Can Improve Refugee Well-Being and Transform Humanitarian Action.', UNHCR, September 2016.
34. 'Landscape Report: Mobile Money, Humanitarian Cash Transfers and Displaced Populations', GSMA, May 2017.
35. 'The Future of Humanitarian Response World Economic Forum Annual Meeting', WEF, 2017.



Refugees and Mobile KYC

For many refugees and asylum seekers, the lack of officially-recognised identity will pose a major barrier to accessing mobile services in their host country. In more than 120 countries, MNOs are now subject to mandatory SIM registration obligations which require customers to present approved identity documents before a SIM card or mobile money service can be activated. In many cases, these Know-Your-Customer (KYC) regulations do not allow customers to use identity documents that have been issued by UNHCR or other non-state actors, and in these circumstances refugees must often wait months, or even years, to obtain government-issued ID before they can access services in their own name.

Where regulators have yet to accept UNHCR-issued documents as official proof of identity, and where refugees face delays or challenges accessing state-issued identity documents, opportunities for MNOs and humanitarian organisations to provide identity-linked mobile services to refugees will be restricted. The potential long-term benefits of mobile services in humanitarian assistance underscores the need for development agencies, host governments and mobile money providers to collaborate on solutions that can enable more refugees and displaced persons to overcome identity-related barriers.

In many of the world's top refugee-hosting countries, individuals without identity documents from their home country will only able to purchase a mobile SIM card once they have been granted refugee status by their host government and possess a government-issued ID - a process could take anywhere from a few months to multiple years. This is currently the case is countries such as Turkey, Iran, China, Lebanon, Kenya, Uganda, Chad, Cameroon, Tanzania and Afghanistan[36]. These markets alone host over seven million refugees, or 40 per cent of the refugees under UNHCR's mandate.

36. Based on publically available information as of June 2017.

Case Study 1: Kenya

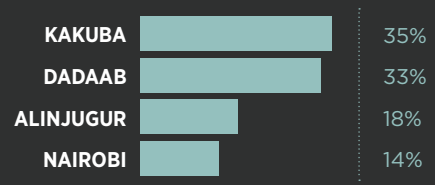
Kenya currently hosts the seventh-largest refugee population in the world, and the second-largest in Africa. By the end of April 2017[37], nearly 500,000 refugees and asylum-seekers were registered on the UNHCR registration system (proGres), the majority of which had fled from either Somalia or South Sudan. The refugee population is expected to remain stable in the near future, with new repatriations to Somalia being offset by additional arrivals from South Sudan. More than forty-five humanitarian organisations, including UNHCR and other UN agencies, government agencies, and local and international NGOs actively support refugees in Kenya under the aegis of the Kenya Comprehensive Refugee Programme (KCRP). The World Food Programme, which is part of the KCRP, has provided food assistance to refugees since 1991.

Registered refugees and asylum-seekers

as of 30 April 2017

486,150 Registered refugees and asylum-seekers

HOST LOCATIONS



86% Living in camps

14% Living in Urban areas

COUNTRIES OF ORIGIN

SOMALIA	306,321	63%
SOUTH SUDAN	97,147	20%
DRC	29,654	6%
ETHIOPIA	27,504	5.7%
SUDAN	9.746	2%
BURUNDI	9,810	2%
UGANDA	2,243	0.5%
RWANDA	1,678	0.4%
ERITREA	1,594	0.3%
OTHERS	453	0.1%

Source: UNHCR

37. See: http://www.unhcr.org/ke/figures-at-a-glance



Identity Documents and SIM Registration in Kenya

In 2015, largely as a response to national security and terrorism concerns, Kenya began the roll-out of a new national identity card that contains the card holder's biometric details, including iris and fingerprint scans. All Kenyans are legally obligated to possess the national ID once they reach the age of eighteen, and the card must be shown when accessing most public and private services, such as applying for any license or permit, paying taxes and bills, accessing formal financial services, or registering a SIM card. As of July 2016, it was projected that 26.3 million Kenyans had these identity cards[38], which suggests that it has almost universal coverage across the over-eighteen population.

SIM registration is mandatory in Kenya, and in order to register and activate a SIM card Kenyan residents must provide an original national identity card, passport, or birth certificate. East African residents (those from Burundi, Kenya, Rwanda, South Sudan, Tanzania, and Uganda) can also register by providing a national passport, an original East African passport or in some cases, a national identity card. All other foreign nationals must provide an original and valid passport or an original alien card issued by the Kenyan government; identity documents issued by humanitarian organisations, including UNHCR, are not an acceptable form of identity for SIM registration.

Humanitarian organisations in Kenya have found that few refugees arrive with an official identity document, and it is assumed that the coverage of national ID cards and passports in most of the refugees' country of origin is limited. The application cost for a Somali passport is US $83, and due to widespread passport fraud, many foreign governments do not recognise this as valid travel documents. Ethiopia does not have a national identity card; rather, the nine regional states and two administrative states (including Addis Ababa City) each have a regional ID which indicates a person's personal details and area of residence. In the DRC, the voter ID card is considered the national ID, and nearly 91 per cent of the population was estimated to possess a voter ID card in 2011. However, with registration only taking place every five years, younger citizens who have recently reached voting age are unlikely to possess this.

38. Mwai, Mercy, 'Millions of ID holders not registered voters', Mediamax Network, 27 July 2016.

Kenya's Refugee Registration and Identification Process

Kenya's refugee population is managed by the country's Refugee Affairs Secretariat (RAS), with UNHCR providing support to the RAS as necessary to help ensure that all asylum seekers and refugees are registered and protected. The registration process begins when an asylum seeker attends a registration interview and provides authorities with basic biographical information, supporting documents (such as a valid ID from their country of origin)[39], fingerprints and a photograph. Once the individual's information has been registered, the applicant is given two documents confirming that they have applied for refugee status: an 'asylum seeker pass' issued by the RAS, and an 'asylum seeker certificate' issued by UNHCR. These documents entitle the applicants to protection within the country and humanitarian support, but do not allow them to access any other public or private services.

Particularly vulnerable applicants qualify for an accelerated (or 'prima facie') RSD process, which can often be completed in three months or less. Currently, all asylum seekers from South Sudan are accorded refugee status on a prima facie basis. All other asylum seekers will have to navigate a more extensive RSD process, which includes additional interviews, an assessment, decision-making, and review process, further research, legal analysis and any other necessary steps to make an assessment of the applicant's claim. While UNHCR does not publish statistics on standard (non-prima facie) RSD waiting times, refugees from Kenya have reported that the typical waiting period is about three years, and in some cases this process has taken as long as seven years[40]. With the government now focused on providing Kenyan citizens with national identity documents ahead of the 2017 elections, this waiting period is unlikely to improve in the near term.

Asylum seekers that have satisfied the requirements for refugee status are issued a refugee identity document, and subsequently a refugee identity card (called an 'alien card') by the National Registration Bureau (NRB). This is the only legal document that allows refugees to access various public and private services, including registering a SIM card and opening a mobile money account. Until this time, refugees are not able to access mobile services unless they find a way to 'work around' these SIM requirements, for instance by using another person's ID to register or by using a SIM that is registered in someone else's name.

The Bamba Chakula Initiative

Leading up to 2015, refugees receiving food assistance from WFP in Kenya were provided with in-kind food rations, and often refugees would sell part of their rations at very low prices to try to access a wider variety of goods. For instance, one might sell a tin of maize to buy tomatoes or sugar. Recognising the inefficiencies this was creating, and understanding that people deserved the dignity of choice when it came to the food they purchased, WFP began to investigate opportunities to work in collaboration with mobile operator Safaricom to provide refugees with electronic food vouchers delivered via mobile.

The strict mobile KYC regulations in Kenya, coupled with a low level of ID ownership amongst those seeking asylum, meant that it was not viable for WFP to provide aid disbursements to its beneficiaries via conventional mobile money accounts. To help find a solution that would be feasible in this context, Safaricom and WFP worked closely with government and the Communications Authority to discuss the aim of their intervention and to agree on the KYC exemptions that would be required to make it successful.

39. Having access to a proof of identity does not make a difference for refugees in terms of timescale, it only makes it easier for the individual to prove who they are throughout the RSD process.
40. 'Refugee Status Determination: Justice Delayed is...Typical?', Kakuma News Reflector, 28 February 2009.

In 2015, the partners introduced Bamba Chakula, a new initiative which enabled WFP to deliver electronic food vouchers directly to single-function SIM cards. These vouchers can be redeemed at a multitude of approved vendors within the camps, giving individuals the ability to choose the types and quantities of food they purchase. Crucially, the new system incorporated the following features to ensure that it gained special approval from the Communications Authority:

- **The SIM cards have restricted functionality:** SIM cards are pin-protected and can only be used to receive the electronic vouchers; they cannot be used to make or receive calls, send texts, browse the internet or access mobile money services.
- **Humanitarian agencies took responsibility for customer identification and verification:** WFP and UNHCR work together to validate eligible beneficiaries and distribute the SIM cards. Safaricom does not engage directly with individual refugees or have sight of their personal details; rather, they provide SIM cards directly to WFP.
- **Harmonised Databases:** Data sharing agreements between organisations allow WFP's Cash Transfer system to be linked to the biometric details stored in UNHCR's proGres database. When a beneficiary in need of food assistance records their biometrics with UNHCR, their information passes from the proGres system to WFP's cash transfer database, and then on to Safaricom. From there, Safaricom can transfer the voucher to the beneficiary's SIM card[41].
- **Safaricom provides a closed-loop payment system:** The electronic vouchers are disbursed in bulk using Safaricom's SurePay solution, a closed-loop payment system that allows WFP to provide electronic vouchers directly to beneficiaries and place tight restrictions on where the funds can be spent. Once a voucher is redeemed at the merchant, Safaricom is able to transfers value from WFP's mobile money account to the merchant's account.

Before the launch of the initiative, surveys conducted by WFP in the Kakuma camp found that only 40 per cent of asylum seekers had possession of a mobile phone on arrival. Rather than purchasing phones for all of the beneficiaries – an expense which may have undermined the sustainability of the programme – the partners ensure that participating merchants have extra handsets on hand that can be used by beneficiaries, and also encourage households to share phones where possible. To ensure that refugees have uninterrupted access to the vouchers, WFP replaces lost or damaged SIM cards through help desks located across the participating refugee camps.

By June 2016, the programme had injected a total of US$ 2.8 million into local markets in Dadaab and US$ 1.7 million into Kakuma[42]. Because the cash transfer process is completely digitised, it is more cost-effective, convenient, and secure than delivering in-kind rations. In fact, a cost-efficiency analyses from WFP shows that providing rations through Bamba Chakula in Dadaab is 15 per cent more cost-efficient than in-kind assistance, and 6 per cent more cost-effective in Kakuma[43]. WFP pays a transaction fee of 1 per cent of the transfer value, which contributes to making the system sustainable for Safaricom.

A key benefit of this project for Safaricom is that it has allowed them to engage with partners in a positive way while helping to address a vital social need. The success of the project has given Safaricom an ambition to scale the initiative across as many refugee camps as possible, and they believe there will be new opportunities to work with other humanitarian organisations to adopt the system to their own cash assistance programmes. There is also on-going discussion from humanitarian agencies around the need to 'unlock' the SIM cards to enable full functionality, especially for refugees that have been given alien cards and are able to comply with KYC requirements. This would allow humanitarian organisations to communicate with refugees more effectively, while also opening new opportunities for MNOs to engage with refugees one-on-one and provide a range of value-added services such as voice and data plans, mobile money accounts and international remittances.

41. 'Bamba Chakula: Vouchers for food assistance in Kenya's refugee camps', World Food Program, May 2015.
42. ibid
43. 'Bamba Chakula: Delivering digital cash in Kenya's refugee camps', World Food Program, June 2016. Note: the higher prices of commodities, combined with the cost to WFP of delivering a higher transfer value in Kakuma, leads to decreased cost-efficiency compared to Dadaab.

Case Study 2: Iraq

Iraq hosts one of the largest populations of displaced persons in the world, reaching over six million by the end of April 2017[44]. The vast majority are internally displaced persons (IDPs) – Iraqi citizens that have been affected by the country's three decade-long conflict. However, the number of refugees and asylum seekers in need of humanitarian assistance has risen rapidly in recent years, mainly due to the ongoing civil war in Syria. Around 85 per cent of the refugees in Iraq are from Syria, with the remainder mainly composed of Turkish, Palestinian and Iranian origin[45].

Population of concern

as of 30 April 2017

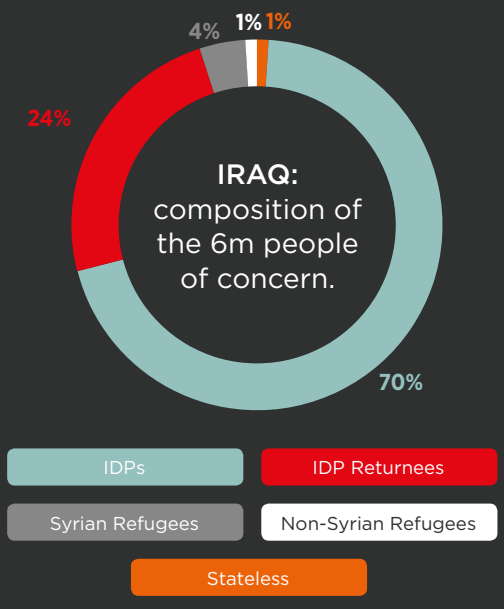
A Total of

6.03million

People of concern

IDPs (3.0m IDPs since 2014* + 1m IDPs since 2006/2007)	4,058,626
IDP Returnees	1,639,584*
Syrian Refugees	236,772
Non-Syrian Refugees	43,403
Stateless	48,500

*IOM Displacement Tracking Matrix (DTM) from January 2014 to 30 March 2017



Source: UNHCR

44. See UNHCR's Iraq Factsheet, April 2017.
45. See: http://reporting.unhcr.org/node/15974

More than 97 per cent of the Syrian refugees in Iraq are concentrated in the Dahuk, Erbil and Sulaymaniyah governorates in Iraqi Kurdistan (KRI), with 60 per cent living in non-camp, urban areas. The KRI is considered to be a natural place for Kurdish Syrians to seek refuge, as they share common ethnic, linguistic, and religious affinities with the Kurdish population of the KRI[46]. As an autonomous region of Iraq, KRI has authority over the northern federal region and handles its own domestic affairs, and for that reason, policies regarding refugees in this region can differ from the rest of the country.

Identity Documents and SIM Registration in Iraq

It is relatively easy for an Iraqi resident to obtain a passport or other identity document in most areas of the country, outside of those that are controlled by the so-called Islamic State[47]. All Iraqi citizens are expected to carry a national ID card, which is widely considered the most important form of ID in the country due to the fact it is used in all contact with the public authorities, the health service, the social welfare services, schools, and when buying and selling property. To be issued an ID card, applicants must fill in an application form signed by the head of the household or a guardian, and also submit a birth certificate and the ID card of a close male relative such as a father or grandfather. National ID cards are issued at the local offices of the Civil Status Affairs Directorate, which are situated all over the country, and registration fees are 1,000 Iraqi dinars, or approximately US $8.

UNHCR has stated that it is not common for Syrian refugees to arrive in Iraq with a valid identity document. In Syria, national ID cards are available to individuals over the age of 14 free of charge, however in recent years citizens have been denied new (or renewed) passports, national IDs and other important documents by the government based on their political views, association with opposition groups, or ties to geographic areas where opposition groups dominated. There are also many reports that the so-called Islamic State has been stealing and destroying passports and other legal documents in Syria[48]. Whereas a Syrian passport normally costs 4,800 Syrian pounds (US $9), acquiring a passport through an intermediary can push the price up to as much as US $150, and the government in Damascus is reporting that the fee for a passport issued at a consulate abroad has jumped to around $400[49].

Iraq Refugee Registration and Identification Process

UNHCR leads the refugee response in Iraq by coordinating the efforts of approximately ninety partners – including government institutions, UN agencies, and non-government organisations – through the Regional Refugee and Resilience Plan (3RP). The Iraqi government is not a party to the 1951 Convention on Refugees, and the government's Permanent Committee for Refugee Affairs, established under the 1971 Refugee Act and reactivated in 2005, does not have the capacity to determine refugee status; therefore, the government allows UNHCR to take ownership of this process. All asylum seekers in Iraq are required to register with UNHCR, and completing this process provides access to international protection, aid and services.

In KRI specifically, Syrian refugees are registered with UNHCR and the Department of Displacement and Migration in Iraq (DDM). Once registered, an individual receives an asylum seeker certificate from UNHCR which is valid for one year, as well as a temporary, free-of-charge residency permit which is renewable after six months. These documents entitle the bearer to essentially the same rights as a KRI citizen, such as the right to work, access to public services, and freedom of movement within the region. The time it takes for refugees to obtain a UNHCR certificate and a residency permit in the KRI region varies based on a number of factors, such the volume of refugee movement in a given time period, but UNCHR generally aims to complete the process within a three-month timeframe. Outside of KRI, refugees are registered by UNHCR in the Al Qa'im camp, which can be completed relatively quickly due to the fact that the camp experiences a much lower influx of refugees. However, refugees here do not receive residency, and they are not permitted to leave the camp[50].

46.'Legal status of individuals fleeing Syria: Syria Needs Analysis Project', The Assessment Capacities Project, June 2013.
47. 'Iraq: Travel documents and other identity documents', LandInfo, 16 December 2015.
48. Pop, Valentina, 'Islamic State Said to Have Industry of Fake Passports', Wall Street Journal, 25 January 2015.
49. Nasralla, Shadia, 'Syrian refugees must buy travel papers - from Assad', Reuters, 26 April 2017.
50.'Legal status of individuals fleeing Syria: Syria Needs Analysis Project', The Assessment Capacities Project, June 2013.



Mobile Financial Services for Refugees

It is estimated that 89 per cent of the population in Iraq lacks access to formal financial products, giving the country one of the highest rates of financial exclusion in the world[51]. However, high mobile penetration in Iraq and across the region suggests that mobile money services, though still relatively new to the market, could help to address this gap. The first mobile money services in Iraq were launched in early 2016: Asiacell's AsiaHawala service, and ZainCash.

In sharp contrast to Kenya, the ability of MNOs in Iraq to provide services, including mobile money, to refugees enhanced by a more flexible, risk-based approach to KYC[52]. Recognising that the vast majority of refugees are unable to present a valid passport, the Central Bank of Iraq (CBI) has granted an exception that allows refugees to open a mobile money account through a tiered KYC system. As long as a refugee has been fully registered on UNHCR's biometric database and has possession of a UNHCR registration certificate, they are able to use this document to open a new mobile money account, albeit one with transfer limits.

This approach to KYC has allowed humanitarian agencies to adopt various electronic payment mechanisms that facilitate cash disbursement to refugees and other displaced persons. For instance, in April 2016, WFP launched a digital cash card, called a SCOPE card, to provide food assistance to IDPs and Syrian refugees across Iraq. To use this system, individuals register their identification information and fingerprints into WFP's database, which is electronically linked to the cards. A loaded SCOPE card swiped at a shop automatically connects to the database to confirm the individual's identity and, like a debit card, the cost of the purchase is deducted from the total balance and recorded on a receipt. In December 2016, WFP also launched a mobile money pilot in the Erbil governorate through mobile operator AsiaCell's hawala[53] platform, leveraging the operator's extensive agent network to make the service more accessible to refugees. SIM cards with full service functionalities were distributed to registered beneficiaries and linked to a mobile money account with the user's identification details.

51. World Bank Global Findex
52. These KYC requirements are still in line with FATF recommendations.
53. 'Hawala' is a traditional system of transferring money used primarily in the Middle East, North Africa, the Horn of Africa, and the Indian subcontinent, whereby the money is paid to an agent who then instructs an associate in the relevant country or area to pay the final recipient.

ZainCash

ZainCash is a mobile money service linked to a fully-functional, registered SIM card, which allows customers to receive payments, transfer money (within Iraq), pay bills, and purchase goods and services. The service was launched in January 2016 by mobile operator Zain to serve all customers in Iraq, and can be downloaded to a smart or feature phone free of charge. Soon after the product was launched country-wide, Zain formed a partnership with UNHCR and the International Committee of the Red Cross (ICRC) which aimed to use this platform to provide humanitarian cash disbursement to refugees and other displaced people.

Because UNHCR certificates are easy for refugees to obtain, ZainCash does not consider the KYC regulations to be a barrier for cash delivery to refugees, and all ZainCash agents are trained to accept UNHCR refugee certificates as a valid proof of identity. Account opening can be facilitated for refugees at any agent location in the country, or at educational events held in partnership with humanitarian organisations at various refugee camps and settlements. During the account opening process a refugee's ID number, as well as their name, date of birth and other personal details are recorded electronically via ZainCash's agent application and a temporary mobile money account is registered instantly; a permanent account is approved within twenty-four hours. Once funds are disbursed through ZainCash to the beneficiary's mobile money account, an SMS message confirms the amount, source, unique ID of the transaction and the account's updated balance. The beneficiary can use the funds however they wish, such as cashing-out at an agent, transferring it to friends and family, or paying for goods and services.

Because they are able to access customer-level data, ZainCash has also been able to develop a dashboard through which humanitarian organisations can access a history of all ZainCash transactions, as well as reports that monitor the progress of humanitarian projects. For instance, 'cash-out reports' allow organisations to identify individuals who are not withdrawing their funds; in these instances, Zain will contact the beneficiary by SMS and phone to make sure they are not experiencing problems using their account.

One challenge with cash disbursement in Iraq is that humanitarian agencies and MNOs like Zain use separate, non-interoperable databases, leading to inefficiencies in the registration process. ZainCash must inform the humanitarian agency when their beneficiaries' accounts have been successfully registered and approved, after which the agency will send the operator a list that confirms each person's eligibility and the value of their disbursement. To make this process more efficient, by the end of 2017 ZainCash intends to implement a self-disbursement system that would enable humanitarian organisations to upload and approve beneficiary lists and conduct disbursements on their own, possibly by integrating with humanitarian organisations' platforms via APIs[54].

Zain's investment in the refugee cash transfer system has allowed the operator to play a positive role in delivering improved services to refugees, and a 1 per cent fee charged to the humanitarian organisation on the value of each transaction is expected to support the long-term sustainability of the system. Revenues from the fees are shared between the agent, super-agent and ZainCash. The full functionality of the SIM cards also creates commercial opportunities for Zain, who are in a position to offer new and customised mobile services to refugees, especially as they become more economically empowered through financial inclusion and humanitarian cash receipts. Other humanitarian agencies are also open to discussing opportunities to utilise this system for their own programmes, and Zain is exploring ways to integrate this.

54. An Application Programming Interface (API) is a set of functions, tools or procedures that allow software programmes to 'talk' to one another.



Key learnings from Kenya and Iraq

The initiatives led by Safaricom Kenya and Zain Iraq provide two examples of how MNOs can work alongside government and humanitarian organisations to deliver innovative mobile services for refugees that provide both social and commercial value. The contrasting identification and KYC regulations seen in each market also provide useful learnings on how stakeholders can work together to reduce the barriers asylum seekers and refugees face when attempting to accesses these services:

Flexible KYC for mobile money: In situations where asylum seekers and refugees are not able to obtain identity documents that meet existing KYC requirements, or in places where the time required to obtain these is significant, governments can create specific humanitarian (or emergency) KYC standards in collaboration with humanitarian organisations. An example of a flexible approach to KYC is the tiered system, whereby transaction and payment limits vary based on customer due diligence (CDD): the more complete the CDD process, the higher the limits[55]. This allows regulators to distinguish between low- and high-risk scenarios, and permit KYC procedures to be conducted accordingly.

International KYC rules established by the Financial Action Task Force (FATF) allow for a certain degree of variability. For example, in some cases the identity of a customer must only be verified if the transaction is set above a limit specified by the national regulator and if the transactions are made regularly. In Iraq, the acceptance of UNHCR biometric registration as sufficient KYC for refugees to receive a limited amount of humanitarian cash transfer is critical to the provision of mobile money services to refugees in that country.

There are other examples where this approach has been used to facilitate humanitarian cash assistance. For instance, Haiti has adopted tiered KYC requirements to enable humanitarian cash assistance via a mobile money account to individuals impacted by the 2010 earthquake. The guidelines for this approach were released by Banque de la Republique d'Haiti (BRH) in September 2010, shortly before – and in preparation for – the launch of mobile money in the country. This flexibility enabled the creation of what has come to be known as a mini-wallet, for which there is no ID required to register. Transactions on this mini-wallet are below the levels permitted for full-fledged wallets: while the maximum balance allowed on the mini-wallet is 7,500 HTG (£90), daily transaction limits are set at 15,000 HTG (£180) and total monthly transaction value cannot exceed 75,000 HTG (£900). Limits on the fully-registered wallets are 10 times higher. For example, the maximum balance allowed on a full wallet is 75,000 HTG (£900).

55.'Proportional risk-based AML/CFT regimes for mobile money: A framework for assessing risk factors and mitigation measures', GSMA, August 2015.

Interoperability and data sharing: When multiple organisations provide humanitarian assistance to refugees and displaced persons, the likelihood of having several, often fragmented, registration processes and databases increases. This can be cumbersome and time-consuming for both the humanitarian agencies and the MNOs who work alongside them. Stakeholders should work together wherever possible to develop standard, harmonised approaches to registration, data collection and ID verification. Leveraging digital technology to establish interoperable databases or to streamline data sharing processes, where permitted, can also reduce fragmentation and improve the efficiency of aid delivery.

Partnerships and Collaboration: The initiatives in Kenya and Iraq highlight how MNOs, humanitarian organisations and governments can work collaboratively to navigate identity-related KYC barriers and ensure that refugees have access to a range of mobile services. The flexible, risk-based approach to KYC in markets such as Iraq and Haiti demonstrates how government and national regulators can help ease the barriers to mobile access among refugees, resulting in new commercial opportunities for MNOs and an ideal context for humanitarian organisations to communicate with beneficiaries, transfer assistance, collect data, and establish unique identities.

MNOs have unique resources that could be leveraged to make registration processes more secure and efficient, improve cross-organisational data sharing, and establish digital identities that can be verified anytime, anywhere. For MNOs, this will translate into new opportunities to work alongside humanitarian agencies to better understand the needs and potential of refugee populations, as well as the obstacles they face in making full use of mobile services. There is a clear need for governments to work with the mobile industry and other stakeholders to ensure that regulatory environments and government policies are designed to best support cross-sector collaboration and increase refugees' access to basic and value-adding mobile services. Future research on this subject should seek to:

- Identify specific ways that MNOs can help governments and humanitarian agencies introduce new or complementary refugee registration and identification systems, using mobile-based digital solutions;
- Establish interoperability protocols that prevent fragmentation amid the proliferation of digital identity solutions.

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