



Impact of Legal and Institutional Frameworks on Sustainable Livelihoods for Urban Refugees in Nairobi County, Kenya

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Abstract

Whereas the impact of legal and institutional framework on refugee well-being has been studied, scanty empirical studies exist on how these have been operationalised for impactful sustainable livelihoods of urban refugees in host countries. The study sought to fill this empirical lacuna by determining the impact of Kenya's legal and institutional framework on sustainable livelihood pathways for urban refugees using Nairobi County, Kenya as a case. Random sampling was used to select 288 refugee households for a quantitative survey while purposive sampling was used to identify participants for Focus Group Discussions and Key Informant Interviews. Quantitative data was coded and Shapiro-Wilk and Levene tests were used to determine normality and homogeneity. Socio-demographic information was analysed using descriptive statistics; Chi-square tests and one-way analysis were used for inferential statistical analysis using R statistical software. Qualitative data from Focus Group Discussions and Key Informant Interviews were thematically analysed. The study findings established that in spite of Kenya being a signatory to key international and human rights instruments, her refugee policy is still largely restrictive and that refugee access to services is hampered thereby exposing them to constant predation by the security agents. Account ownership to ease financial access was statistically and significantly higher ($p=0.007$) among male than female refugees and different ($p=0.001$) among refugee nationalities. Operationalisation of the Refugee Act of 2021 to secure socio-economic rights for refugees and extensive legal and rights awareness among refugees, nationals and authorities need to do to fast track participatory compliance with Kenya's international obligations to refugees.

Introduction

Forced displacement is one of the foremost development challenges confronting the world in the 21st century. The United Nations Refugee Agency (UNHCR) estimated the size of the global refugee population at 120 million by the end of 2024 (UNHCR, 2025). In addition to the rapidly growing number of refugees, cases of protracted exile have significantly increased (Omata, 2021). Refugees in the Global South, comprising 89% of the total refugee population globally, remain in protracted displacement long after the cessation of emergencies. At the end of 2016, the average length of displacement was 20 years (Omata, 2021). Despite the increasing number of refugees and population mobility resulting from a myriad of forces, there has been diminishing humanitarian



support as donors give limited attention to situations of protracted displacement (Aleinikoff, 2015; Omata, 2017; Omata, 2021). The rising cases of protracted displacement, coupled with dwindling international aid, have heightened the call for refugee protection regimes to provide local integration for refugees within their first countries of asylum, particularly by ensuring greater participation in economic activities and access to livelihood opportunities (Milner, 2014; Jacobsen & Fratzke, 2016; Betts et al., 2018).

Kenya's refugee situation and legal framework

Kenya has hosted refugees for more than three decades and is the 13th largest refugee-hosting nation in the world (UNHCR, 2019). According to UNHCR (2025), there were about 800,000 refugees in Kenya at the end of 2024, despite accusations that Kenya has developed a reputation as a hostile hosting nation due to draconian refugee laws (Omata, 2021). As Milner (2009) observes, Kenya's refugee policy reflects a stance of "containment" and "abdication," signifying the containment of refugees in overcrowded camps in remote areas of the country while abdicating the responsibility of refugee protection to UNHCR. While it is true that Kenya has a strong foundation in refugee law due to its ratification of all treaties regarding refugee protection at both international and regional levels, its commitment to fair treatment of refugees- especially their right to move freely and work- remains uncertain (Campbell et al., 2011; Betts, 2013; Omata, 2021). In recent years, Kenya's refugee policy has increasingly shifted toward "securitisation," particularly after refugees of Somali origin were linked to the Al-Shabaab terror attacks that impacted Nairobi between 2013 and 2015 (Refugee Consortium of Kenya, 2015; ReDSS, 2015). In light of these heightened tensions, arising from the perception of refugees as a national security threat on one hand and the necessity to adhere to international laws and protocols on the other, there is a pressing need for research to examine the impact of the Kenyan refugee law regime on sustainable livelihood opportunities for refugees. While scholars have attempted to conduct comparative analyses of livelihood opportunities for refugees in camps and urban areas of Kenya (Zetter & Ruaudel, 2016; Omata, 2017; Betts et al., 2018; Omata 2021), the relationship between the country's legal framework and its practical implications for the sustainable livelihoods of urban refugees has not been established.

Conceptual framework

This study anchors its conceptual framework in the Sustainable Livelihoods Framework, the Global Compact for Refugees, and the Sustainable Development Goals. The Sustainable Livelihoods Framework (SLF), the Global Compact on Refugees (GCR), and the UN Sustainable Development Goals 2015-2030 (SDGs) are interlinked frameworks providing a powerful analytical and policy lens to address how legal and institutional frameworks impact sustainable livelihoods in Kenya. The SLF structurally analyses how urban refugees access and utilise various assets at their disposal- physical, natural, social, financial, and human- to pursue sustainable livelihoods within Kenya's legal and institutional context (DFID, 1999; Scoones, 1998). Urban refugees in Nairobi live outside camps and must navigate complex legal, economic, and social systems. The SLF is relevant in demonstrating how legal and institutional frameworks affect livelihood outcomes.

The GCR reinforces this by suggesting the need for whole society, inclusive responses that promote refugee self-reliance and integrate them into national socio-political and economic systems (UNHCR, 2018). Kenya has adopted the GCR and its complementary Comprehensive Refugee Response Framework (CRRF), and efforts are underway to enhance urban refugees' access to education, work, and documentation (UNHCR, 2016). Therefore, the GCR provides a framework for this study to structurally analyse how barriers and challenges to economic opportunities for refugees may be addressed.



Materials and methods

This study was conducted in Nairobi County, Kenya, the country's capital. Nairobi was selected for this study due to its significant refugee population, hosting an estimated 109,400 refugees and asylum seekers, which accounts for 16% of Kenya's total refugee population (UNHCR, 2025). Unlike other Kenyan cities, Nairobi has the most diverse refugee community, comprising individuals from Uganda, Rwanda, Burundi, the Democratic Republic of Congo, South Sudan, Ethiopia, and other nationalities. This diversity provides a strong foundation for a comparative analysis of how different socio-demographic factors influence urban refugees' experiences and economic outcomes. This study adopted a pragmatist mixed-methods approach, integrating quantitative and qualitative data collection techniques to explore the complex realities refugees face in Nairobi (Opoku et al., 2025; Strijker, 2020; Morgan, 2014). According to Ecke, et al., a more comprehensive analysis can be conducted where both quantitative and qualitative sources are triangulated.

, a sample of 398 respondents was calculated from a total population of 109,400 refugees in Nairobi (UNHCR, 2025) using Yamane's (1973) formula below; $n = \frac{N}{1+N(e)^2}$

Where n is the sample size, N is the population size, and e is the level of precision set at 0.05.

$$398.4 = \frac{109,400}{1+109400(0.05)^2}$$

Of the 398 households, 288 successfully completed the survey, representing a response rate of 72.61%. Low response rates in forced displacement research arise from many factors, including language barrier, and trauma, which may also reduce research participation (Hynie, 2018; Moravska & Gill, 2019). Additionally, cultural language barriers may also hinder engagement (Turton, 1996). To overcome these barriers, this study employed refugees with lived experiences as enumerators and assured participants of their confidentiality (Jacobsen & Landau, 2003; Hynie, 2018). Where appropriate, the study combined in-person and phone interviews based on participants' preferences. Furthermore, community leaders were used to recruit participants to enhance trust and boost engagement (Turton, 1996).

Participants in the focus group were purposively sampled based on their gender and nationality. Key informants were also purposively sampled for their expertise in refugee protection and forced migration issues (Lugusa, 2016).

Results and discussion

Demographic and socio-economic characteristics of respondents

Socio-demographic data is critical for understanding refugees' varied experiences and how legal and institutional frameworks affect their access to sustainable livelihoods is crucial. Age, gender, and legal status within legal structures support various refugee groups equitably, informing policy reforms (Zetter & Deikun, 2010; UNHCR, 2019). It also enables practitioners to design and implement targeted livelihood programmes that respond to the specific needs of marginalised groups of people living with disabilities (International Rescue, Committee, 2020).

A total of 288 respondents participated in the study, comprising 108 (37%) were from the Democratic Republic of Congo (39%), Ethiopia (21%), Rwanda (20%), and Burundi (13%) (Figure 4). Other nationalities represented included Somalia (10%), Eritrea (0.7%), South Sudan (0.3%), Uganda (0.3%), and other (0.3%). They were classified as recognised refugees in the Refugee Status Determination (RSD) process, while the 11% were asylum seekers under review by the Government of Kenya and the United Nations High Commissioner for Refugees (UNHCR), the



average length of displacement among respondents was 11.2 years (SD = 5.5). Notably, Rwandese refugees experienced a significantly longer mean displacement duration (17.6 years, $p = 0.001$) compared to Somali (11.4 years), Ethiopian (10.2 years, SD = 4.5), Burundian (10.4 years, SD = 4.5), and Congolese refugees (8.2 years, SD = 2.3). The mean age of respondents was 32 years (SD = 8), with no statistically significant variation across nationalities. The average household size was 3.88 individuals (SD = 2.27), also showing no significant differences by nationality. However, female-headed households had a slightly larger average size (Mean = 4.12, SD = 2.29) compared to male-headed households (Mean = 3.75, SD = 2.25), although this difference was not statistically significant. More than half (51%) of respondents were married, 1.7% were divorced, and 5.5% were separated. Additionally, 42% of respondents were single.

Regarding educational attainment, 12% of respondents had completed primary education, 18% had completed secondary education, and 16% had attained tertiary education. Meanwhile, 10% had no formal education, while 43% had either some primary or some secondary education. Language proficiency varied among respondents: 43% reported having basic English skills, 35% were conversational in English, and 22% were fluent. In contrast, 6% had only basic Swahili skills, while 49% could converse in Swahili, and 45% were fluent. Self-employment was the predominant source of income among refugees in Nairobi. Specifically, 64% of Burundian, 72% of Congolese, 55% of Ethiopian, 39% of Rwandese, and 41% of Somali refugees earned their livelihoods through business or self-employment. Additionally, 2.6% of Burundian refugees derived their income from both self-employment and remittances. Employment rates varied across nationalities, with 15% of Burundian, 11% of Congolese, 30% of Ethiopian, 24% of Rwandese, and 10% of Somali refugees engaged in wage employment. Some refugees combined multiple income sources to enhance their earnings; 7.7% of Burundian, 2.1% of Congolese, 6.7% of Ethiopian, and 6.8% of Rwandese refugees earned income from both employment and self-employment. Among Rwandese refugees, 3.4% reported earning income from crop sales, which was twice the proportion of those earning through employment and remittances, business, or remittances and humanitarian assistance (1.7%). Refugees from Ethiopia reported the highest mean monthly income (KES 28,700, SD = 16,938, $p = 0.001$), significantly higher than their Somali (KES 26,476, SD = 15,275), Rwandese (KES 25,746, SD = 17,420), Burundian (KES 18,282, SD = 10,993), and Congolese (KES 14,268, SD = 7,263) counterparts. Male refugees earned significantly higher mean monthly incomes (KES 23,284, SD = 14,445, $p = 0.007$) than female refugees (KES 18,748, SD = 14,745).

Refugee perceptions of their understanding of the legal framework

Refugees were asked about their perceptions regarding the legal architecture in Nairobi (Figure 1). Awareness of the Kenya Constitution (2010) appears to be the lowest, with 55% of respondents indicating poor understanding and only 12% rating their knowledge as good. This suggests that many refugees may be unaware of their constitutional rights in Kenya, potentially limiting their ability to navigate legal protections and engage civically. Similarly, 54% of respondents report a poor understanding of Nairobi City by-laws, indicating challenges in comprehending local governance regulations that could impact their daily lives.

The Refugee Act of 2021, which directly affects refugees, fares slightly better; however, 49% still rate their understanding as poor, with only 18% considering it good or excellent. This limited awareness may hinder refugees' ability to access legal protections and services designed specifically for them. Similarly, human rights law is poorly understood by nearly half of the respondents (47%), reflecting a broader issue of limited legal literacy that could leave refugees vulnerable to rights violations. Understanding of refugee law follows the same pattern, with 46% reporting poor knowledge and only 14% claiming a good grasp of it.

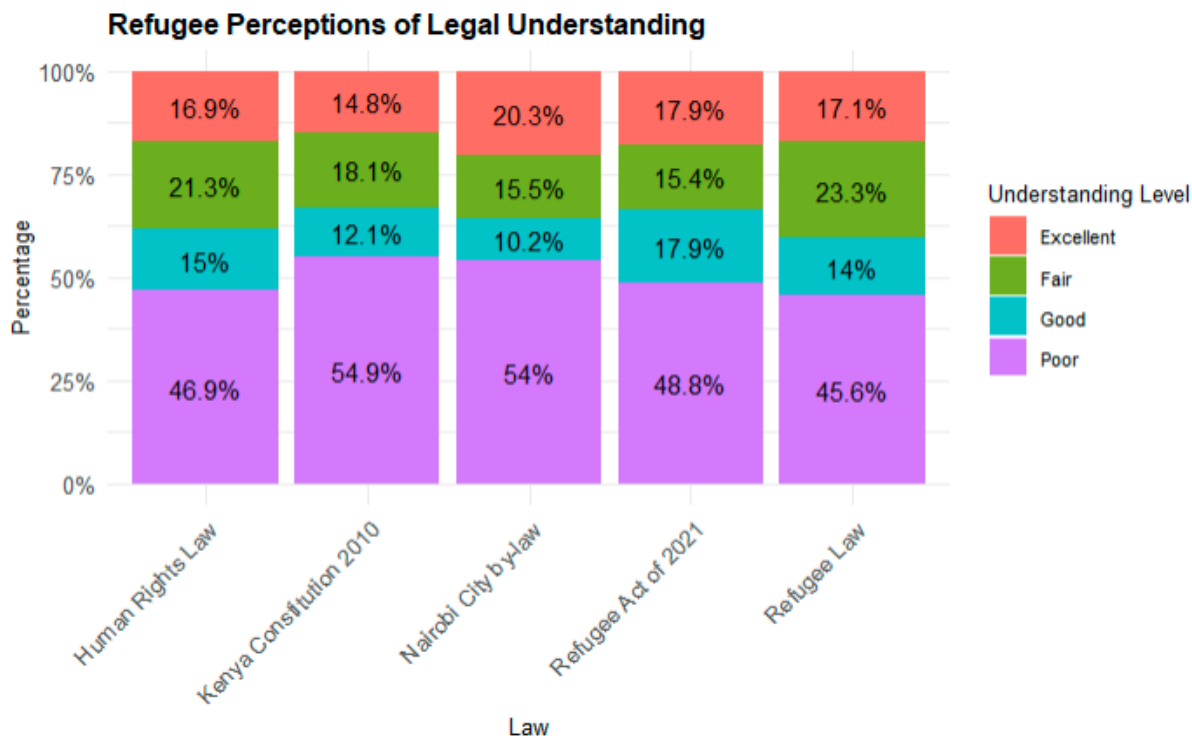


Figure 1: Refugee perception of legal understanding

Source: authors, 2025

Documentation types and their expiry dates

The extent to which refugees utilise their identity cards or documents for various livelihood-related activities is critical for their survival and access to essential services. The study aims to identify the types of documentation held by refugees, their awareness of their documents’ expiry dates, and the duration of their RSD process. Among the 288 respondents, the majority hold a Proof of Registration (POR) document (89%) and a Refugee ID (86%), signifying high levels of formal documentation. A smaller proportion possesses an Asylum Pass (8.8%), while 2.9% report having all three documents. Notably, 1.1% of refugees do not have any identification documents, which could hinder their access to essential services. There is variation in refugees’ awareness of their ID expiry dates. While 37.2% know their ID will expire in two to three years and 21% report having less than a year before expiration, 32.3% are unaware of when their ID will expire, indicating potential risks in maintaining valid legal status. Additionally, 10.3% report their IDs expiring within four to five years, showing that some refugees have longer-term stability in their documentation. The average length of the RSD process was over 4 years (Mean=4.24 years; SD=6.38), indicating long waiting periods for asylum seekers who apply for refugee status.

The extent to which refugees utilised their identity cards or documents for various livelihood-related activities is presented in Table 1. A significant majority (90%) of refugees registered a mobile line, and 66% successfully registered for MPESA services, demonstrating widespread mobile financial inclusion. Focus group discussions and key informant interviews revealed that although refugees had access to MPESA services, their mobile lines were registered through their Kenyan proxies. Access to digital government services via the e-Citizen portal was low, with only 39% of respondents able to use their identification documents to access government services online.



In terms of accessing support services, 82% of refugees reported using their identity documents to obtain humanitarian assistance.

Meanwhile, 44% applied for a Kenya Revenue Authority (KRA) PIN, a tax compliance requirement. Education and employment-related applications showed mixed accessibility. Half (50%) of respondents used their identity documents to apply for college, while 46% used them to apply for jobs. However, formal business engagement remains limited, as only 35% of refugees reported being able to obtain a business permit or work permit. Approximately half (50%) of refugees successfully opened a bank account using their identity documents. Similarly, 44% accessed health insurance, suggesting that barriers to financial and healthcare services persist.

Table 1: Livelihood-related activities undertaken using refugee identification documents in Nairobi

Characteristic	N = 288 ¹
register mobile line	259 (90%)
register own MPESA services	192(66%)
access e-citizen portal	112(39%)
access to humanitarian assistance	236(82%)
apply KRA pin	126(44%)
apply for college	145(50%)
apply for a job	134(46%)
obtain business permit	102(35%)
obtain a work permit	100(35%)
open a bank account	145(50%)
Access Social Health Insurance Fund (SHIF)	127(44%)
Access National Social Security Fund (NSSF)	84 (29%)

¹n (%)

Source: authors, 2025

The findings highlight key challenges in documentation and legal recognition for refugees. The high proportion of individuals unaware of their ID expiry dates indicates a need for enhanced communication and outreach to ensure timely renewal and prevent lapses in legal status. Furthermore, the extended and highly variable RSD process underscores the necessity for more efficient Refugee Status Determination procedures to improve stability and access to rights and services. Additionally, these findings reveal challenges refugees face in obtaining formal employment, business opportunities, and digital government services. The relatively low rates of work permit acquisition emphasise legal and bureaucratic barriers to formal economic participation. Consistent with previous studies (Betts et al., 2018; Zetter & Ruaudel, 2016; International Rescue Committee, 2020), the majority of respondents in this study earned their livelihoods from the informal sector. Upon application, refugee IDs should be issued within 90 days. Article 28 (6) of the Refugee Act of 2021 guarantees the right of refugees and asylees to identification and civil registration, highlighting the importance of these documents in ensuring access to rights and services within the context of Kenyan law. Furthermore, article 28 (4) underlines the role of documentation in facilitating refugees’ contributions to Kenya’s socio-



economic development. However, these seemingly progressive provisions are undermined by article 28 (7), which equates refugee IDs to a Foreign National Registration Certificate, a prerequisite for work permits and employment. Consequently, this results in restrictions on access to educational institutions and freedom of movement. This partly explains the limited range of livelihood-related activities that refugee IDs enabled for respondents in this study. By March 2021, there were 60,000 unregistered refugees (Graham & Miller, 2021), and this number grew to over 100,000 three years later (Refugee International, 2024). Similar to the findings of this present study, the estimated RSD period in Kenya has been found to be between two months and three years, a clear violation of the Refugee Act of 2021 (Graham & Miller, 2021; Zetter & Ruaudel, 2016; International Rescue Committee, 2022). Our key informant interviews identified four main factors contributing to complications in RSD. First, RSD procedures are often unclear, and these challenges are exacerbated by the inconsistent transition of this process from the UNHCR to the Kenyan Government (Graham & Miller, 2021). This is further complicated by refugees' low levels of education and lack of proficiency in English and Swahili skills (International Rescue Committee, 2022), a finding corroborated by this study. Second, the DRS lacks sufficient capacity to meet the high demand from numerous refugees applying for RSD. This incapacity is compounded by corruption among specific RSD officials. Third, the cost of travelling to DRS offices for the RSD process is prohibitive and often inaccessible for many refugees. Finally, the Kenyan Government has rescinded RSD services for new asylees in Nairobi, requiring them to reside in camps to access these services. Failure to obtain documentation restricts refugee participation in formal employment, with the majority opting to work in the informal sector as hawkers or traders, contrary to Kenya's commitments under the Kampala Declaration (International Rescue Committee, 2022).

Table 2 compares financial and digital access characteristics between female ($N=108$) and male ($N=180$) respondents, highlighting both similarities and gender-based disparities. Mobile phone ownership was nearly universal among both genders, with 97% of female refugees and 98% of male refugees reporting ownership, showing no statistically significant difference ($p=0.7$). However, when it came to mobile line ownership, male refugees (59%) were significantly more likely than female refugees (43%) to own a mobile line ($p=0.007$), suggesting possible gendered barriers to independent mobile connectivity.

Access to MPESA, a widely used mobile money service, was similarly high across both genders, with 94% of female refugees and 97% of male refugees having access ($p=0.4$). Likewise, internet access rates did not show a significant difference, with 81% of female refugees and 84% of male refugees reporting connectivity ($p=0.6$), indicating comparable levels of digital inclusion. In contrast, bank account ownership presents a notable gender disparity; a significantly higher proportion of female refugees (26%) reported owning a bank account compared to males (13%) ($p=0.008$). This finding implied that while men are more likely to have independent mobile lines, women are more engaged in formal banking services.

Regarding financial behaviours, 34% of female refugees and 36% of male refugees reported having savings, with no statistically significant difference between the two ($p=0.8$). Similarly, while slightly more women (41%) than men (34%) reported having accessed a loan before, this difference was also not statistically significant ($p=0.2$). These findings suggest that both genders exhibit similar financial habits concerning saving and borrowing.



Table 2: Gendered financial inclusion characteristics of urban refugees in Nairobi

Characteristic	Female N = 108 ¹	Male N = 180 ¹	p-value ²
Do you own a mobile phone	105 (97%)	177 (98%)	0.7
Do you own a mobile line	46 (43%)	107 (59%)	0.007
Do you have access to MPESA?	102 (94%)	174 (97%)	0.4
Do you have access to internet?	81 (81%)	143 (84%)	0.6
Do you own an account?	26 (26%)	22 (13%)	0.008
Do you have savings?	37 (34%)	65 (36%)	0.8
have you accessed a loan before?	44 (41%)	61 (34%)	0.3

¹n (%)

²Fisher's exact test

Source: authors, 2025

Legal and institutional framework for refugees in Kenya

The overall trend regarding refugees’ perceptions of their awareness of laws was consistently low, with most individuals lacking strong contextual legal knowledge. Only a minority expressed confidence in their legal understanding, highlighting a pressing need for legal education programmes targeting refugees. Kenya’s Refugee Law is based on regional and international legal obligations, including the 1951 UN Convention Relating to the Status of Refugees and its 1967 Protocol. Kenya became a signatory to these twin instruments in May 1966 and November 1981, respectively. Additionally, Kenya ratified the 1969 Organisation of African Unity Convention Governing the Specific Aspects of Refugee Problems in Africa in June 1992 (Muindi & Mberu, 2019; International Rescue Committee, 2022). From a human rights perspective, Kenya is a signatory to the 1948 UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights, both of 1966. These instruments, among others, are recognised by the Kenya Constitution 2010 as forming part of its laws, stating that general rules of international law, such as international customary law and international treaties, form part of the laws of Kenya. Article 27 of the Kenya Constitution prohibits any form of discrimination and emphasises the importance of upholding the rights of all individuals, including refugees (International Rescue Committee, 2022).

The influence of international law on Kenya’s Refugee Law and policy landscape is further demonstrated by the incorporation of international laws into the Refugee Act of 2021. The Act outlines the administrative framework for managing refugee affairs, protocols for Refugee Status Determination, the rights and responsibilities of refugees in Kenya, and the management of designated areas for refugees, including issues related to freedom of movement. Section 28 of the Act guarantees the right to hold legal documents that allow them to engage in gainful employment or business, provided Kenyan authorities recognise their qualifications. The Refugee Act of 2021 established the Department of Refugee Services (DRS), the Refugee Advisory Committee (RAC), and the Refugee Status Appeals Committee (RSAC) to handle the affairs of refugees. The DRS oversees refugee matters, including RSD processes, identification, protection, freedom of movement, and durable solutions. RAC advises the relevant Cabinet Secretary on refugee policy, while RSAC addresses appeals against decisions on applications for refugee status (International Rescue Committee, 2022).



The above frameworks are supported by the Kenya CRRF, which incorporates international, regional, and national legal and policy instruments to detail Kenya's refugee response through an implementation strategy (Kenya Comprehensive Refugee Response Framework, 2021). The Kenya CRRF seeks to enhance the protection of refugees and asylees, support their ongoing needs and those of host communities, and promote international cooperation and responsibility sharing to realise durable solutions.

No refugee framework in Kenya explicitly secures the rights of refugees to fully access economic opportunities. Therefore, fulfilling such commitments requires equity. On one hand, refugees are allowed to have bank accounts; however, the obligations to verify customer identity (Know Your Customer) in Article 45 of the Proceeds of Crime and Anti-Money Laundering Act of 2009 exclude refugees from accessing many financial services, as refugee IDs are not accepted. Additionally, Article 27A of the Kenya Information and Communications Act of 1998 (Revised Edition, 2020) directs telecommunication companies to obtain the customer's full name, ID number, address, gender, and date of birth. For foreign nationals, the Supplementary Registration of SIM-Cards of 2015 requires national passports or alien cards. Since Kenya no longer issues alien cards and many refugees lack passports, these regulations effectively exclude them from obtaining SIM-cards (International Rescue Committee, 2022). A study on financial services and digital inclusion by Vos et al. (2020) revealed that urban refugees were prohibited from accessing the MPESA mobile money system.

The legal bottlenecks highlighted above are reflected in the findings of this study. Access to bank accounts among refugees in Nairobi was very low. Saving and borrowing heavily relied on informal, community-based systems such as shylocks, *Hawalas*, and Urban Savings and Loans Associations (USLAs). Focus Group Discussions and Key Informant Interviews revealed that documentation requirements were a barrier to digital and financial inclusion. Besides the challenges highlighted above, refugee IDs require renewal every five years, which sometimes changes the initial ID numbers. As such, financial service providers flag and block most accounts. The majority of urban refugees in Nairobi used Kenyan proxies to access SIM-cards and MPESA services.

Findings on the restrictive effects of Kenyan policies on refugee access to financial services and employment opportunities have also been reported by Arthur et al. (2020), Zademach et al., (2021) and Dhawan & Zollmann (2023). Similarly, findings by Batsaikhan et al. (2019) studied how Know Your Customer regulations limited the integration of refugees and asylum seekers in the European banking system. This study concluded that the solution to this problem would not be to eliminate the regulations, but to tailor them to the needs of refugees, offering clear guidelines to banks and streamlining refugee identification processes. The study suggested private-public partnerships as a possible route for greater refugee integration. In navigating government restrictions, the UNHCR, Financial Sector Deepening Africa, and the International Labour Organisation have targeted Microfinance institutions (MFIs) (Arthur et al., 2020) since MFIs are not subject to Know Your Customer (KYC) regulations (Kitimbo., 2021). However, the uptake is still low due to the systemic economic exclusion faced by refugees (Dhawan & Zollmann, 2023).

Conclusion

It is evident that refugees' understanding of the legal and policy infrastructure in Kenya is low due to legal ambiguities and low education levels among them. Additionally, complex Refugee Status Determination processes limit refugees' access to essential services and formal employment. There is an urgent need for the operationalisation of the Refugee Act of 2021 to ensure that refugee protection is realised in practice, and to incorporate public-private investments, which are crucial for streamlining the channels that facilitate the financial and digital inclusion of refugees. Future



research directions should focus on the development of protocols for the operationalisation of existing laws to help refugee-hosting states like Kenya close the gaps between policy and practice.

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