Refugees International

KENYA

Removing Red Tape to Get Kenya's Refugee Act Right

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About Refugees International

Refugees International advocates for lifesaving assistance and protection for displaced people and promotes solutions to displacement crises around the world. We do not accept any government or UN funding, ensuring the independence and credibility of our work.

Featured Image: Macumi Bahimba with his daughter and granddaughter, representing three generations of refugees in living in the Nairobi Kawangware area in Kenya. Photo credit: Erick Rugambwa.

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Executive Summary

Kenya's Refugee Act 2021 offers a promising model for refugee integration at a time when many countries are tightening restrictions. The passage of the Refugee Act marked a significant shift in Kenya's refugee policy. It moves away from a camp-centric model in which refugees rely on humanitarian aid and towards a model of local integration that allows refugees to contribute to their and host communities' socioeconomic development. The law recognizes refugees within a development framework rather than a purely humanitarian one. Refugees now have a circumscribed freedom of movement and the right to work and own property. However, work and travel permits are still hard to obtain in practice. Kenya's shift toward refugee integration is occurring as its population becomes increasingly urbanized. Of Kenya's nearly 1 million refugees, 16 percent live in urban areas, with at least 100,000 residing in Nairobi. Before the law, most refugees were required to live in Daadab and Kakuma refugee camps in remote areas. However, as urbanization increases, more refugees are moving to cities where they can find better economic opportunities.

Despite legal improvements on paper, two key challenges prevent urban refugees from fully accessing their rights. First, refugee registration systems and Kenya's national identification system do not have data interoperability. Second, complex work permit requirements impose unrealistic standards on refugees.

Refugee registration data is managed by the Department of Refugee Services (DRS) and the UN Refugee Agency (UNHCR), while the Kenya National Registration Bureau (NRB) handles national identity records. These two systems do not communicate. The NRB collects biometric data and issues national IDs, essential for accessing government services such as tax registration and driver's licenses. Because refugees' information is not integrated into the NRB system, they are effectively invisible to the government and unable to access essential services. For urban refugees, this lack of registration is particularly damaging. Unlike those in camps who receive aid, urban refugees must be self-reliant. They remain vulnerable and excluded from economic opportunities without access to government services.

Meanwhile, Kenya's employment laws treat refugees as expatriates, making it nearly impossible for them to obtain work permits. Refugees may qualify for a Class M work permit, but to apply, they must provide a Tax Compliance Certificate and a passport, both of which require NRB registration. Since most refugees are not in the NRB system, they cannot obtain these documents. Even if they do, the process is expensive and time-consuming. Additionally, employers must justify hiring refugees by proving that their skills are "unavailable locally." This standard is unrealistic for most refugees, who typically have only a few months of upskilling. As a result, in practice, very few qualify for employment.

Improving data interoperability is a low-cost but high-impact reform. Integrating refugee records into the NRB system would allow refugees to access services, register businesses, and pay taxes, benefiting refugees and the national economy. Similarly, reforming the Class M work permit to create an exception for refugees would allow them to join the labor market. Uganda has demonstrated that its dependence on humanitarian aid drops significantly when refugees can work. Kenya can unlock this same potential by lowering employment barriers.

To implement the Refugee Act correctly, government agencies and donors should also engage Refugee-Led Organizations (RLOs) meaningfully. RLOs work directly within refugee communities and understand their needs better than external actors. Donors must shift away from viewing refugees as a "risky investment" and recognize them as valuable partners in long-term development. However, engagement with RLOs must be meaningful, not just symbolic.

By addressing these systemic barriers and slashing red tape, Kenya can fully realize the potential of the Refugee Act 2021 and create a more inclusive and self-reliant refugee population. This endeavor could not be more urgent as global humanitarian aid commitments are being slashed, and refugees in Kenya have been left reeling from those cuts.

Recommendations

To the Government of Kenya's Department of Refugee Affairs:

- Collaborate with the Kenya National Registration Bureau to ensure data interoperability between the refugee registration and the Bureau's data. The current data discrepancy prevents many refugees from accessing Kenya's government's online services through the E-Citizen platform.

- Establish a single unified ID instead of the current arrangement of refugees seeking movement passes to travel across the country to ease refugees' freedom of movement.

- Partner with donors to identify, engage, support, and strengthen the capacity of refugee-led organizations, from registration to direct service delivery.

- Create the Refugee Engagement Forum to work with the Department on implementing refugee law. The forum should represent Kenya's refugee diversity, ensure gender balance, and address specific needs. Its establishment must meet the public participation requirements outlined in Article 10(2)(a) of the Kenyan Constitution.

To the Government of Kenya's Ministry of Interior and National Administration:

- Waive excessive job requirements for refugees, including those applied to expatriates. Remove questions 18 and 19 of the Class M permit application, which force employers to confirm that no Kenyan citizen possesses the skills for which a refugee is hired.

- Ensure the number of refugees issued with Class M work permits is published through the Directorate of Immigration Services.

- Develop a new framework for registering refugee-led organizations. The current requirements are too burdensome, forcing some RLOs to operate informally and preventing them from applying for external funding.

- Direct the Cabinet Secretary of Interior and National Administration to establish the Refugee Status Appeals Committee, as authorized by the law. This committee should hear cases of refugees seeking to remain in urban areas instead of relocating to camps.

To UNHCR and Other Humanitarian Agencies:

- Integrate refugee-led organizations into the humanitarian system, including working groups and clusters. Their voices, concerns, and ideas must be part of planning and coordination.

- Ensure data protection and privacy protocols are shared with Kenyan authorities during data interoperability. This safeguard is essential for refugees, particularly those who fled due to political involvement in their home countries.

To the World Bank and Donors:

- Assess the economic costs of integrating refugees into Kenya to support effective planning. Refugee camps are in historically marginalized regions, and subnational governments need accurate data to include refugees in their economic plans.

- Launch a coordinated public information campaign for Kenya Urban Support Program II, a World Bank initiative supporting the transition of refugee camps into integrated settlements. The campaign should target refugees through community radio stations and RLOs, as awareness of the program remains low.

- Establish and actively engage Refugee Engagement Forums to ensure refugee input in World Bank projects. These forums should help shape the Refugee Policy Review Framework (RPRF) and protection assessments.

- Shift from short-term, project-based funding to a flexible, long-term funding approach for RLOs. Decentralize decision-making to the communities RLOs serve. Funding should support locally driven, culturally relevant initiatives that offer sustainable solutions.

Methodology

This report is based on the field interviews Refugees International conducted in October 2024 in Kenya. The team interviewed refugee leaders, representatives of the World Bank, UN and other humanitarian agencies, Kenyan authorities, and refugee law, livelihood, and urbanization experts in Nairobi, Kakuma, and Daadab. This report builds on an earlier report with the Kenya National Human Rights Commission.

Urban Refugees

Before Kenya enacted the Refugee Act 2021, refugees were predominantly kept in Kakuma and Daadab camps, with a small percentage in major cities like Nairobi, Mombasa, and Nakuru, under a special dispensation granted by the Kenyan authorities. In the camps, the refugees mainly rely on humanitarian aid from agencies. The Act changes Kenya's policy from encampment to social-economic integration of refugees into the host communities by changing the camps into urban settlements. Urban areas offer more social and economic opportunities, whether in Turkana or Garissa, where the refugee camps are located or in Nairobi, Mombasa, etc.

According to the World Bank, Kenya is urbanizing at a rate of 4.3 percent per year. In 2019, approximately 31 percent of Kenya's population lived in urban areas, a figure projected to reach 50 percent by 2050. This urbanization rate exceeds the continental average of 3.5 percent.

Kenya's five most significant urban centers generate over 70 percent of the country's GDP. The government also hosts nearly 1 million refugees, with 16 percent residing in urban areas, primarily in Nairobi. However, most urban refugees live in informal settlements with inadequate public services, including housing and sanitation. Despite their marginalization, efforts are being made to create opportunities through decentralized governance structures in refugee-hosting areas.

A key step in this direction came on March 30, 2023, when Turkana County Governor Jeremiah Ekamais Lomorukai Napotikan conferred municipality status to Kakuma, including the Kakuma refugee camp, Kalobeyei integrated settlement, and Kakuma town. This move aims to transition refugee camps into settlements and promote socio-economic integration through an area-based approach, which considers the needs of an entire geographic area while emphasizing community engagement.

Since 2019, the Turkana County Government in Kenya has piloted possibilities of economically integrating refugees and the host community through the 15-year, multi-agency plan, the Kalobeyei Integrated Socio-Economic Programme (KISEPD). The plan has become a hallmark for refugee economic inclusion by integrating refugee programs into the Local County Integrated Development Planning.

This has made it possible to advance access to protection for populations of concern, improved access to socio-economic integration, support for local solutions, opportunities for expanding investment in education and health, and access to the labor markets and other livelihood opportunities, such as the IFC Kakuma Kalobeyei Challenge Fund (KKCF) that has increased refugee private sector participation and increased opportunities for self-reliance.

A 2016 World Bank study on Kakuma, among others, found refugees' presence boosts Turkana's "Gross Regional Product (GRP) by over 3 percent, income per "local" person increases by 0.5 percent, and total employment increases by about 3 percent." Additionally, in a 2018 study, the International Finance Corporation (IFC) found that Kakuma has a market size of $56.2 million.

Despite this progress, Kenya's Refugee Act does not explicitly outline how refugees can participate in urban socio-economic development in the newly established Kakuma or Daadab municipalities. While the Act supports refugee inclusion in local and national development plans, specific frameworks for participation remain unclear. These municipalities are expected to provide public goods and services that drive economic growth, improve the business climate, and create employment opportunities. The World Bank plays a central role in urban development in these countries through the Second Kenya Urban Support Program (KUSP2), which supports the transition of refugee camps into integrated host communities.

However, Daadab and Kakuma are in arid regions with limited economic opportunities beyond pastoralism. In Turkana County, livestock keeping sustains about 62 percent of the population. Meanwhile, major cities like Nairobi and Mombasa struggle to provide adequate public services. Additionally, refugees are excluded from the national census and surveys like the Kenya National Housing Survey, resulting in limited demographic and economic data. Without sustained donor investment to support the implementation of the local integration model, meaningful refugee inclusion will be challenging to achieve.

Development partners, notably the World Bank and UN-Habitat, should collaborate with the national and county governments to enhance local governance capacity and ensure integrated services for host and refugee communities. Donors can directly fund Turkana and Garissa counties to incorporate refugees into economic planning. Additionally, refugee-hosting regions lack sustainable revenue streams and technical expertise in refugee management. A protection-based approach is needed to ensure refugees' legal and economic inclusion in Kenya's broader development strategy.

Barriers to Refugee Rights and Freedoms Under the Act

Right to Work

The Refugee Act 2021 prioritizes self-reliance by granting refugees access to the labor market and the ability to start businesses as an alternative to encampment and dependence on humanitarian aid. However, bureaucratic obstacles severely limit the realization of these rights. Refugees' two primary challenges are obtaining work permits and registering with the National Registration Bureau (NRB), essential for legal employment and business operations.

Work Permit Challenges

While refugees legally have the right to work, obtaining a work permit is complex and bureaucratic. The Citizenship and Immigration Act and Sessional Paper No. 4 regulate work permits for all foreign nationals, including refugees. Under Article 40 of the Citizenship and Immigration Act, refugees are eligible for Class M permits, allowing them to engage in any occupation, trade, business, or profession.

To obtain a Class M permit, refugees must submit a cover letter from an employer (like foreign professionals seeking employment in Kenya), a valid Tax Compliance Certificate, and a Department of Refugee Services recommendation. However, acquiring these documents is time-consuming and costly, requiring multiple approvals and extensive paperwork.

The permit application form also includes exclusionary requirements. For example, question 18 asks employers, "What steps have you taken to confirm that the skills/qualifications sought are unavailable locally?" While this question is reasonable for expatriates, it places refugees—who already face significant disadvantages—at a further disadvantage. A humanitarian agency officer told Refugees International that many refugees struggle to meet this requirement, as most receive only short-term training (typically three to six months) from humanitarian organizations. These skills, which many Kenyans possess, do not give refugees a competitive edge in the job market. Additionally, the application form requires supporting documentation, including proof of capital and academic or technical qualifications, which many refugees lack.

Registration Challenges

Beyond the challenges of obtaining a work permit, refugees must also navigate Kenya's registration system. A refugee must be registered with the National Registration Bureau to apply for a Tax Compliance Certificate or passport. However, not all refugee data has been transferred from the Department of Refugee Services to the National Registration Bureau. If a refugee's information is missing, they cannot access hundreds of government services that require a National Registration Bureau portal ID number. These services include tax registration with the Kenya Revenue Authority, driver's license issuance by the National Transport and Safety Authority, and other essential government functions.

Even after completing all necessary steps, securing a Class M work permit remains uncertain. A representative from a refugee organization in Nairobi reported that out of 86 refugees who applied for a Class M permit, only one received approval. The Kenyan government has not publicly disclosed how many work permits have been issued to refugees since the Refugee Act was passed in 2021.

In job applications, refugees should not be treated as expatriates who willingly leave their country rather than refugees who leave for fear of persecution and safety. The Class M Work Permit application should be amended, especially questions 18[1] and 19[2] [FOOTNOTE2], so the refugees are not held to such an exactingly high qualification bar. This common-sense approach to removing the barrier will allow many refugees to join the labor force and become self-reliant.

The Refugee Act allows refugees to work, but bureaucratic barriers prevent them from enjoying the law's benefits.

A South Sudanese refugee told Refugees International:

> "I am a content creator on TikTok. The main challenge has to be gaining access to a PayPal account, which requires an M-Pesa or bank account, which is very difficult to acquire as a refugee without a KRA pin, school permit, or work permit. I've tried opening an account with several banks, including Equity, which I believed had an agreement with UNHCR to help refugees open accounts, but I still don't have one. I renewed my ID in 2022, and unlike the old one, the new ID has 10 digits, which was supposed to help me access services like e-citizen. However, that hasn't been the case—I've tried using it for KRA registration, but it hasn't worked."

1 Since the form is filled by the employer, question 18 requires information on what steps the employer has taken to confirm that the skills/qualifications sought are not available locally.

2 Question 19 regards a requirement that the refugee employee is training a Kenyan citizen so that once they eventually depart a Kenyan will take over the functions. While on the face of it, these questions seem reasonable since they were designed with an expatriate in mind, when applied to refugees, they are exclusionary, and set a significantly high bar for refugees to be employed. (https://www.kenyarep-jp.com/visa/form/Form%2025%20Application%20for%20Entry%20Permit.pdf)

Right to Open Refugee Businesses

Self-employment is a key pillar of refugees' socio-economic integration and formal employment. However, significant barriers hinder this, including difficulties obtaining SIM cards, accessing mobile banking, and registering businesses.

Article 28(6) of the Refugee Act allows refugees to start businesses, work, and practice a trade or profession, provided the Kenyan government verifies their qualifications. Refugees must follow the same business registration process as other foreign nationals, registering as sole proprietors or limited liability companies. This requires submitting documents such as a passport or national ID, a Kenya Revenue Authority (KRA) PIN, passport photos, and partnership deeds.

To obtain a business permit, applicants must register with the Kenya Revenue Authority, the National Hospital Insurance Fund, and the National Social Security Fund. Completing these registrations requires navigating multiple online forms and obtaining the necessary approvals.

Refugees also need a bank account and a registered SIM card to manage a business effectively. Although the Refugee Act permits refugees to open bank accounts and acquire SIM cards, these processes require permanent identification documents, which the standard refugee ID does not provide. Refugees struggle to build creditworthiness, access financial services, or establish savings without these.

Despite the Act granting refugees the right to self-employment, no specific legislation defines their rights regarding business registration, land ownership, cooperative access, or employment services. A baseline study by the International Labour Organization highlights this gap, emphasizing the absence of explicit legal provisions on refugee business ownership.

Further complicating matters, various government agencies regulate different aspects of financial access. While the Communications Authority of Kenya oversees SIM card registration, mobile money services fall under the National Treasury. As a result, a refugee may obtain a SIM card but fail to receive Treasury clearance for mobile banking. Many refugees circumvent this by registering businesses and mobile banking services under Kenyan nationals, leaving them vulnerable to exploitation, particularly in financial disputes.

The interoperability of UNHCR and Department of Refugee Services data with the National Registration Bureau is essential to ensuring refugees fully benefit from the rights established under the Refugee Act. Inclusion in the Bureau's database would enable refugees to access Kenya's e-government services and exercise their rights under the Refugee Act more effectively.

Freedom of Movement and Documentation

Freedom of movement and proper documentation are essential for refugees to access jobs, start businesses, and achieve self-reliance. However, restrictions on movement and the complex process of obtaining official documents, including refugee IDs, prevent many from fully participating in the labor market.

The Refugee Act grants refugees freedom of movement but imposes conditions on how it is exercised, primarily through travel permits. These restrictions mainly affect urban refugees, who must support themselves, unlike those in camps who receive aid from humanitarian agencies.

Under the Act, refugees are generally confined to designated areas unless they qualify for protection needs or family reunification exceptions. To travel beyond these areas, they must obtain a Movement Pass issued by the Commissioner for Refugee Affairs. However, the law does not clearly define the criteria or process for obtaining these passes, creating uncertainty.

This bureaucratic system significantly limits refugees' ability to work outside camps or operate businesses. The International Labour Organization notes that the Movement Pass process is unclear, difficult to navigate, and rarely approved for business purposes.

Beyond the Movement Pass, refugees must obtain multiple documents to remain legally recognized. A 2017 Norwegian Refugee Council study found that Nairobi refugees often need government-issued refugee IDs, UNHCR mandate certificates, movement passes, appointment slips, asylum seeker permits, and proof of registration. Acquiring these documents is complicated, time-consuming, and costly. Despite these barriers, many refugees move to urban areas, seeking better economic opportunities than those in camps like Daadab and Kakuma.

A Kenyan-born Rwandese refugee shared their experience:

> "My biggest challenge has been related to documentation. I was supposed to renew my ID, but instead, I was sent back for a Refugee Status Determination (RSD) interview, and I'm still waiting for their response. As a Rwandese refugee born here, I don't understand why I had to go through the RSD process again."

A South Sudanese refugee told Refugees International:

> "Traveling within urban areas is also tricky, depending on the mode of transport. For example, you can't fly to Mombasa like any other person, nor can you board the SGR train without bribing officers to let you on. I do not think there are any changes, even with the proposed changes. The act is promising. The solution to this is entrusting a Kenyan with the funds you receive via a TikTok account in the hopes that they are trustworthy."

For vulnerable groups, these restrictions pose even more significant risks. An LGBTIQ+ refugee from the region told Refugees International that traveling to camps in Daadab or Kakuma would put them in danger. In Nairobi, they can access support networks and live with less fear.

Only about 3,600 Movement Passes are issued annually, allowing just 2 percent of refugees in Kakuma to legally leave the camps each year (as of March 2020 data). Streamlining refugee documentation, improving coordination among government agencies, and introducing a single, unified refugee ID would help refugees navigate these bureaucratic hurdles and fully exercise their rights under the Refugee Act.

Refugee Integration Costs

The lack of reliable data on refugees in Kenya makes planning for their social and economic integration difficult. Beyond the data collected for humanitarian aid, there is little aggregated information on refugees. Until recently, refugees were excluded from national housing, census records, key Kenya National Bureau of Statistics surveys, and economic and housing studies.

Accurate data is essential for assessing the costs of integrating refugees into national and local development plans. It would help Kenyan authorities, humanitarian agencies, and donors determine the financial implications of different levels of refugee inclusion—whether minimal, partial, or complete economic and social integration.

Without this data, counties and cities hosting refugees cannot effectively incorporate them into their development strategies. Turkana, where Kakuma is located, and Garissa, home to Daadab, rank poorly in socioeconomic indicators. According to World Bank data from 2021, Turkana County had a poverty rate of 78 percent. With such high poverty levels, Turkana lacks the financial capacity to integrate refugees into its development plans, even if policies exist on paper.

In urban areas like Nairobi and Mombasa, most refugees live in informal settlements with inadequate or nonexistent public services, even for Kenyan citizens. Comprehensive data would help authorities and development partners assess these challenges and design more effective policies to support refugees and host communities.

Lessons from Uganda on Refugee Integration

Integrating refugees into a host country's economy benefits refugees and local communities. However, measuring these benefits requires accurate data. In Uganda, the World Bank used the international poverty line of $2.15 per day (2017 purchasing power parity) to estimate the cost of meeting basic needs. The study found that allowing refugees to work reduces the aid they need by nearly 45 percent. If refugees rely solely on humanitarian assistance, the cost per person is about $343 annually. When refugees are economically active, this cost drops to $193, a 43 percent reduction.

Kenyan authorities and the World Bank should regularly collect detailed data to assess the cost of refugee integration. The Shirika Plan was designed as a blueprint for implementing the Refugee Act, but it took too long to publish and lacked a legal foundation. If challenged in court, it could create significant policy gaps. A previous Refugees International report recommended that the Ministry of Interior develop a clear refugee management policy. This would improve coordination between national and county governments, humanitarian agencies, and development partners.

Uganda also provides an example of effective coordination between the government, humanitarian agencies, and donors like the World Bank. In 2015, when conflicts in South Sudan and the Democratic Republic of Congo increased the number of refugees in Uganda, humanitarian agencies expanded water services in camps. However, this approach left water access fragmented, unstable, and inefficient. Overuse, lack of funding, and dependence on external aid caused infrastructure breakdowns.
To address these challenges, Uganda transferred water systems in refugee settlements to the national water authority, the National Water and Sewerage Corporation. This shift improved coordination, standardization, and long-term sustainability. The government also introduced a user fee to ensure equal access and financial sustainability for refugees and host communities.

According to international water and sanitation standards, each household should have at least two clean water containers (10–20 liters) and enough storage to maintain a steady supply. Kenya does not meet this standard. A 2019 study by UNHCR, the European Humanitarian Commission (ECHO), and the Norwegian Refugee Council (NRC) found that per capita water access in Kakuma and Kalobeyei was only 17.4 liters per day. A 2024 Local Engagement Refugee Research Network report highlighted that Kakuma's thousands of refugees rely on just six boreholes to serve Kalobeyei and the host community.

Refugees in Dadaab face similar shortages. They rely on borehole water, but limited fetching times leave some households without access. The inadequate water infrastructure is frequently damaged or sabotaged, worsening the situation.

Kenya's transition from a humanitarian to a development-focused refugee policy should include integrating water services into national systems. Consolidating water management under government agencies and introducing nominal user fees would help sustain the water supply for refugees and host communities. This approach would also ease tensions between refugees and locals over scarce resources.

Refugee-Led Organizations

Refugee-led organizations (RLOs) are crucial in helping refugees integrate into Kenyan society. These groups include associations, coalitions, faith-based initiatives, and self-help groups run by refugees or asylum seekers. Some operate formally, while others function informally.

RLOs address refugees' needs in both urban and camp settings. A study on RLOs in East Africa found that they became particularly active during the COVID-19 pandemic. When international organizations and UNHCR struggled to engage directly with communities, RLOs provided essential services. Their strong community ties, cultural knowledge, and local presence allow them to respond quickly to urgent needs, such as informal vocational training and education.

RLOs work directly within refugee communities, fostering trust and collaboration. They play a key role in handling sensitive issues such as gender-based violence and discrimination. Their community presence allows them to offer real-time feedback to NGOs and UNHCR about local conditions.

RLOs are often the first point of contact for new arrivals in urban areas. Some provide safe housing for refugees who cannot afford rent. Youth-led RLOs advocate for better refugee participation in decision-making and improved public perceptions of refugees. Many RLOs in urban areas register as community-based organizations (CBOs) with county governments. However, women-led self-help groups often operate informally, limiting their ability to access funding and expand their impact. For instance, the Refugee Led Organizations Network (RELON) office is in their community. On any day, their office is a beehive of people's activities, including those of other RLOs seeking assistance. Umoja Refugee Creatives is RLO formed by the Burundian refugees in Nairobi, and it offers diverse services to the refugees, including audio-video training for young journalists and women empowerment programs.

Before RLOs emerged, Kenya had no standardized process for registering refugee-led organizations. Refugees in urban areas often obtained registration through local authorities, while those without connections remained unregistered. In 2023, the Department of Refugee Services (DRS) mandated that all RLOs register as CBOs under the Community-Based Act, simplifying the registration process.

Funding and Capacity Challenges

RLOs can potentially improve refugee integration, but Kenyan policies limit their growth. In addition to unclear registration procedures, RLOs struggle to access funding. Most funding comes through intermediaries, which often do not cover overhead costs.

A global study on refugee-led organizations found that RLOs received only $26.4 million in humanitarian and development funding in 2022. The average grant size was $26,657—ten times smaller than funds allocated to local or national NGOs. Most of this funding came from private foundations rather than traditional donor agencies. The Hilton Foundation alone provided 46 percent of the budget, according to a study by the Overseas Development Institute (ODI) and Development Initiatives (DI).

There is no public record of the total funding received by Kenyan RLOs in 2023. However, the European Union allocated €16 million ($16.6 million) in humanitarian funding for Kenya in 2024, which likely includes support for refugee organizations. Many donors provide only symbolic funding to RLOs due to misconceptions about their capacity. Some see RLOs as passive aid recipients rather than active agents of change. Others assume RLOs lack professionalism, accountability, or the ability to manage large grants. These perceptions lead to donor hesitancy and force international organizations to channel funds through intermediaries, reducing the amount RLOs receive. One RLO leader, Refugees International interviewed, said donors need not go through intermediaries to engage with refugees. The notion that RLOs are risky to fund is a self-fulfilling prophecy that donors and INGOs engage in.

RLOs also lack partnerships and training opportunities. Many NGOs engage RLOs only in project implementation rather than in leadership roles. To operate independently and sustainably, RLOs need capacity-building support. This includes training in financial management, strategic planning, fundraising, and advocacy. Stronger RLOs could better advocate for refugee rights and participate in decision-making at local and national levels.

Conclusion

Refugees move to urban areas because they offer opportunities that camps do not. Kenya's refugee law is a positive step, especially regarding the right to work, since urban refugees do not get support from humanitarian agencies, unlike those in the camps. However, refugees still struggle to access jobs and government services because they are treated as expatriates and lack integration in national registration systems. Addressing these issues would significantly improve the lives of urban refugees who do not receive humanitarian aid like those in camps. Additionally, donors must meaningfully engage refugees for the law to have a real impact. Refugees know best what works for them, so recognizing their leadership and investing in refugee-led organizations will ensure that policies genuinely serve their needs.

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