

Financial Inclusion or Encampment? Rethinking Digital Finance for Refugees

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Abstract

Humanitarian actors touting financial inclusion posit that access to financial services builds refugees' resilience and self-reliance. They claim that new digital financial tools create more efficient and dignified pathways for humanitarian assistance and enable refugees to better manage their savings and invest in livelihoods, especially during protracted displacement. Our in-depth, repeat interviews with refugees in Kenya and Jordan refute this narrative. Instead, self-reliance was hindered primarily by refugees' lack of foundational rights to move and work. Financial services had limited ability to support livelihoods in the absence of those rights. The digital financial services offered to refugees under the banner of 'financial inclusion' were not mainstream services designed to empower and connect. Instead, they were segregated, second-class offerings meant to further isolate and limit refugee transactions in line with broader political desires to encamp and exclude them. The article raises questions about the circumstances in which humanitarian funding ought to fund financial service interventions and what those interventions are capable of achieving.

Keywords: refugees; financial inclusion; self-reliance; Kenya; Jordan

Introduction

'Financial inclusion' has become the cause du jour for several humanitarian players in the forced migration space. The United Nations High Commissioner for Refugees' (UNHCR) 2018 Global Compact on Refugees called for financial inclusion as a means to support 'self-reliance', which they define as 'the social and economic ability of an individual, household or community to meet essential needs in a sustainable manner and with dignity' (UNHCR, 2005: 1). A number of international agencies and governments have taken up the cause, making significant political and financial commitments to financial inclusion programming for refugees (Federal Ministry for Economic Cooperation and Development *et al.*, 2017; Martin, 2019; ILO, 2021). These players assert that by drawing refugees into host countries' financial systems, refugees can receive cash assistance and remittances more easily as well as save and borrow funds to build stronger livelihoods.

In this article, we use new research in Kenya and Jordan to show that financial inclusion cannot promote self-reliance in contexts where refugees are unable to work and move freely. In these contexts, digital financial services can provide channels for relief funds. However, the mechanisms host governments allow (and donors fund) end up being extensions of agendas of exclusion. Rather than *including* refugees in mainstream financial services, refugee financial transactions are hived off into separate, closed and second-rate financial systems. Where access to mainstream finance could be helpful for sustaining a livelihood (as with Kenya's ubiquitous mobile money system), financial encampment becomes one more hurdle for refugees to jump in their attempts to earn a living in spite of a restrictive policy environment.

Kenya and Jordan are helpful locations to study the role of digital finance in the lives of refugees. Both host large numbers of refugees (about 508,000 in Kenya and 701,000 in Jordan) (UNHCR Kenya, 2021; UNHCR, 2022). Both received significant donor investments in



digital financial services, especially for the distribution of humanitarian cash transfers. They have differing financial ecosystems that allow for helpful comparisons. While Kenya has a mature, robust mobile money ecosystem, Jordan's digital financial services remain nascent (GSMA, 2017, 2020; Chehade *et al.*, 2020).

We find that the logic of financial *inclusion*, implying embracing refugees within existing financial systems, stands in stark contrast to the logics of *exclusion* in practice by host governments. Restrictions on refugees' labour market access and free movement fundamentally inhibit finance – and many other livelihood interventions – from enabling self-reliance. When financial inclusion initiatives collide with exclusionary host country policies, humanitarian players and donors cede their goals of 'inclusion' in favour of pragmatic alternatives. In Kenya and Jordan, this led to the deployment of separate, often limited-purpose financial services. We argue that this constitutes a form of financial encampment, providing second-rate financial access (i.e. the ability to use specific financial instruments) without inclusion (i.e. incorporation into existing, mainstream financial systems on the same terms as host populations). In response to various exclusions, refugees accepted jobs illegally, registered for financial accounts with borrowed IDs or purchased PayPal accounts online. Sometimes these behaviours are cited as creative, resilient workarounds (Shepherd *et al.*, 2020; Omeje and Mwangi, 2014), but they often increased research participants' precarity while also undermining financial system integrity.

We show that what refugees really need to build livelihoods are foundational rights: to work and set up businesses, move freely and obtain identity documents (IDs). The global push for these rights has given way to a series of nominally market-led technical interventions (such as financial services and vocational trainings) imagining them as substitute paths to well-being, even in the absence of fundamental rights.

Our arguments are consistent with and build upon other scholars' critiques of the self-reliance paradigm in the humanitarian space (Krause and Schmidt, 2020; Meyer, 2006; Kaiser, 2006). The neoliberal conception of self-reliance reimagines refugees as entrepreneurs and resilient agents who can and should bounce back from crisis if provided the right technical inputs (Ilcan and Rygiel, 2015). In practice, the approach shifts the burden of refugee welfare from the international community and host governments onto refugees themselves (Bardelli, 2018), without addressing their political exclusions (Easton-Calabria and Omata, 2018).

The self-reliance paradigm – coinciding with increasing 'humanitarian neophilia' (Scott-Smith, 2016) and

financialisation (Tazzioli, 2019; Bhagat and Roderick, 2020) – has ushered in a wave of digital innovations seeking to formalise refugee identities (using biometrics or blockchain), labour market participation (by onboarding refugees on gig platforms) and financial transactions (through cash transfers using mobile wallets). While such technologies promise to improve the bureaucracy of refugee support (Weitzberg *et al.*, 2021; Burton, 2020), they often simultaneously solidify boundaries of exclusion and inclusion and sometimes put refugees at risk of exploitative, punitive surveillance and political risk (Jacobsen and Fast, 2019; Iazzolino, 2021; Martin and Taylor, 2021; Tazzioli, 2019).

Ultimately, the reality of refugees' bounded agency remains. Rather than being a tool of connection and empowerment, digital finance ends up reinforcing the economic exclusion of refugees. It makes physical encampment more tenable through a more efficient delivery of aid and remittances while also policing the boundaries of refugees' economic participation.

Methods

This article draws on research conducted in Jordan and Kenya under the Finance in Displacement (FIND) project supported by the German Federal Ministry for Economic Cooperation and Development (BMZ). The project ran from September 2019 to December 2020 with the aim of understanding how refugees financially navigated their lives moving into and through protracted displacement situations. In both countries, in-country teams conducted a series of three in-depth, repeat interviews with the same refugee participants, displaced between three to ten years and living in camp and non-camp environments, with a focus on those trying to build livelihoods outside of camps. Interviews covered financial histories, livelihoods and financial and risk management strategies. A key goal of the study was to understand the role of financial services. Rather than querying usage patterns of specific financial devices, we attempted to centre refugees' economic lives and understand the role of these services within that broader context.

In Jordan, our initial sample consisted of eighty-nine participants in non-camp, urban settings, from five countries of origin: Syria, Yemen, Iraq, Sudan and Somalia. The sample was almost equally split between Syrians and non-Syrians and between male and female participants. Seventy of eighty-nine participants had been in Jordan for three to eight years. Seventy-two belonged to the working age group of eighteen to forty-five years. Seventy-two had at least one member of the household working in an income generating activity, most of which were irregular and seasonal in nature.

Twenty-five participants received monthly UNHCR multi-purpose cash assistance. We conducted the first interviews between September and December 2019. In the subsequent two rounds of interviews, which happened after the start of COVID-19 between May and June 2020 and October and December 2020, some participants dropped out. We ended with a sample of sixty-eight in the third round.

In Kenya, due to COVID-19 travel and in-person research restrictions, the core sample consisted of only Nairobi-based participants, whom we recruited before the pandemic. The team amended interview guides to be more structured, facilitating phone interviews. This sample started with eighty participants in June 2020, which dropped to seventy-three by the third round of interviews in November 2020. Participants were from Burundi, Congo, Ethiopia, Somalia and South Sudan. Just over half of participants were women and the average age was thirty-one years. On average, participants had been in Kenya for 5.7 years at the time of our study.

Given that travel restrictions limited our reach, we augmented this core sample by recruiting six bilingual refugees living outside Nairobi to write their own financial autobiographies remotely, based on our training over Zoom and a detailed written guide of questions. After feedback, the six initial biographers then identified and interviewed up to four other refugees in their communities, working together to record these refugees' own stories. From this work, we compiled and published a total of thirty anonymised financial biographies from refugees living in Kakuma and Mombasa (Gitonga *et al.*, 2021). This group included all the nationalities of the Nairobi sample along with a small number of refugees from Sudan, Uganda and Rwanda.

Two-Tier Finance in Jordan

A Broader Paradigm of Exclusion

Jordan's refugee policies have been shaped by the multiple waves of refugees it has received, including from Palestine (1948), Iraq (1979, 1991, 2003 and 2014–15) and Syria (2011–12) (Lenner, 2020). Over time, refugees also arrived from Yemen, Sudan, Somalia and other African countries. Jordan is not a signatory of the 1951 Refugee Convention. A 1998 Memorandum of Understanding between the Government of Jordan and UNHCR provides the basis for recognition and treatment of refugees. Refugees registered with UNHCR are legally allowed a maximum stay of six months during which UNHCR should find a durable solution, be it voluntary repatriation to the country of origin or resettlement in a third country (UNHCR and Government of Jordan, 1998).

In practice, refugees have not been offered durable solutions within six months. Resettlement has been possible for only a small share of the most vulnerable refugees. Return is still not an option, as most refugees' home countries remain unsafe (UNHCR, 2021c). Consequently, most remain in Jordan in a protracted situation, leading to donor calls to integrate refugees into the local economy, in part to cope with declining humanitarian funding. Under the Syrian Regional Response this is termed as 'local solutions and opportunities' rather than 'integration', a term the Government of Jordan resists as it calls for expanded refugee rights and facilitating assimilation and naturalisation (UNHCR, 2014; 3RPSyria, 2021).

In spite of the large numbers of refugees living in protracted displacement in Jordan, the state's policies are still oriented towards providing temporary protection, with refugees often referred to as 'visitors' or 'guests' (ILO, 2015). International support and close cultural ties have softened this stance somewhat for Syrian refugees. Through the Jordan Compact, international donors committed aid and access to EU markets in exchange for Jordan opening jobs to Syrian refugees. Jordan pledged to issue 200,000 work permits for Syrian refugees and rolled out a series of reforms meant to ease access to work permits, expand sectors available for employment and facilitate business ownership (Stave *et al.*, 2021). Syrian refugees are allowed to obtain legal work permits and start a home-based business under certain circumstances, but the processes for both are complex and costly (International Rescue Committee, 2020). They must have a Jordanian partner to start a business outside the home and are not allowed to own property, buy a car or obtain a driver's licence.

The Compact has fallen short of expectations in terms of both bolstering the Jordanian economy and improving livelihoods for Syrians (Lenner and Turner, 2018). Some argue that jobs available to refugees do not constitute decent work, as they are concentrated in agriculture, construction and services with low-wages and high seasonality. Employers have been reluctant to hire refugees due to bureaucratic hurdles, time and costs associated with sponsoring permits and costs of social security contributions. Refugees worry that taking a job could mean losing humanitarian assistance (Durable Solutions Platform, 2020; Fallah *et al.*, 2021).

Humanitarian actors have tried to promote home-based businesses (including e-commerce more recently) as an alternative to wage work, particularly for refugee women. Our study participants' business ventures remained small and survival-oriented due to low competitiveness and the overall weak economic situation of the country (Oxfam *et al.*, 2018; Arab Renaissance for Democracy & Development, 2021). Those who tried to

start businesses outside the home struggled to find a trusted Jordanian partner, as required by law. The use of digital platforms to access gig work or e-commerce to sell products was not common and presented a new set of challenges for refugees (Hunt *et al.*, 2018). A few study participants who had tried gig platforms faced challenges such as fear of revealing their identities, losing assistance, attracting legal action (if working without permits or in sectors which were ‘closed’ for refugees), risking women’s safety, non-payment of full wages or just lack of job opportunities. These interventions may present potential opportunities to support refugee livelihoods but are not the focus of this paper and not discussed in further detail.

The barriers to the labour market were higher for non-Syrian participants, who were not able to access work permits or open businesses. Excluded from the Jordan Compact, non-Syrians were treated as other foreign workers, whose labour force participation was regulated by the restrictive Law on Residence and Foreigners’ Affairs (Government of Jordan, 1973). They must provide extensive documentation to obtain a work permit and pay high annual fees of around US\$994 for those in our study. Even refugees meeting these requirements feared jeopardising their UNHCR protection and possibilities for resettlement (Human Rights Watch, 2021; Waja, 2021). Sudanese and Somalis faced fears of detention and deportation. A number of Sudanese were deported following protests outside UNHCR in 2015, and Somalis worried that having come on medical visas or Yemeni passports might put them at risk (Mennonite Central Committee, 2017; Staton, 2019). Thus, non-Syrian participants had no choice but to work illegally, putting them at a high risk of being arrested during frequent labour inspections.

What Use Is Finance without Foundations?

In contrast to the resilient entrepreneurs that the self-reliance paradigm depicts, most refugees in Jordan are actually poor and vulnerable (Brown *et al.*, 2019). Study participants attributed their poor financial conditions to lack of decent jobs, low wages and legal hurdles in finding work or setting up businesses. As a result, most depended on assistance when there was no income from informal work or when businesses backslid. This was exacerbated by the pandemic, which disproportionately impacted refugees (World Bank and UNHCR, 2020). The cases of two research participants, Iman and Abbas, illustrate how finance, digital or otherwise, could not ensure self-reliance when their paths to realistic livelihoods were blocked by absence of foundational rights, costly bureaucratic processes and uncertain futures in the country.

Iman, a 40-year-old Syrian, felt socially integrated into a small town in Northern Jordan, where they arrived in 2013, but she did not feel financially stable. ‘Until I no longer need to borrow for our daily needs, I will not feel stable.’ Her family of eight included three men of working age, who were only able to find low-wage (five to seven US\$ a day), seasonal and informal work in construction.

Iman did not work regularly as she had to care for her son who had a disability. She worked under the Cash for Work programme once, which paid a decent monthly wage of US\$490. But refugees are allowed a maximum tenure of only two months. She tried to apply again but was rejected. Her daughters were studying in college, and helping them finish was a priority for the family. This was difficult with income falling short of expenses for most of the year. They received monthly food assistance from the World Food Programme (WFP), but they always used this money – a total of US\$190 – to pay for part of the rent. They met basic needs for food, medicine and other household essentials by borrowing from the grocery store, pharmacy, friends, family and neighbours, typically having nine to eleven loans outstanding at a time.

Iman imagined two paths to a more stable future. In one, her family would sell their small piece of land in Syria and be able to buy a home in Jordan to cut down on rent payments. But refugees were not permitted to purchase property in Jordan. The second path would be to establish a small car workshop for her sons. Here, the bigger problem was not finance, but Iman’s inability to find a trustworthy Jordanian partner required by law for such refugee-owned businesses run outside the home. She was also hesitant to invest given that the family could be forced to leave Jordan and would then lose everything.

Economic opportunities for non-Syrian refugees were even more limited. Abbas, a 32-year-old refugee from Yemen had been in Jordan since 2017, living in an industrial town outside of Amman. During his first few years in Jordan, he leveraged social networks to work his way through irregular, low-paying jobs. He used formal money transfer agents to send as much of his earnings as possible back to his family in Yemen. While he had a passport, agents started asking to also see his work permit, which he did not have. Employers also often asked for one, and without it he could only get low-paying, temporary jobs, like those in the back of the warehouse where he was out of sight from labour inspectors. Abbas was a trained engineer with experience in solar panel installation in Yemen. He once found a job installing solar panels in South Jordan through a local gig platform, Open Sooq, but was paid only half of the agreed rate. Without a work permit, he had no legal pathway to complain. He tried to apply for one only to

learn he would need to raise the impossible sum of US \$4,700 in fees plus US\$1,550 in visa overstay fines.

For both Iman and Abbas, like all other research participants, financial services could have played a transformative role enabling savings or mobilising capital only if they were able to pursue more secure livelihood opportunities. Without the rights to do so, financial services played a more minor role, either enabling some online payments or smoothing the flow of aid and remittances to refugees remaining dependent on financial assistance.

Financial Access without Inclusion

In spite of workforce exclusions, the [Central Bank of Jordan \(2017\)](#) considered refugees a key segment in their financial inclusion strategy. However, this inclusion was limited to mobile wallets which were not yet ubiquitous mainstays of the local economy. Moreover, only Syrian refugees could access the document (a card issued by the Ministry of Interior) required to open a mobile wallet. Non-Syrians must provide a valid passport which most do not have ([GSMA, 2020](#)).

The mobile wallet ecosystem in Jordan has been influenced by humanitarian actors and their push for digital cash transfers. Early during the wave of Syrian arrivals, the UN, non-governmental organisations (NGOs) and government agencies developed the Common Cash Facility to coordinate cash distributions and implement shared infrastructure to release payments. Through this system, a range of agencies disbursed funds to beneficiaries who could withdraw in full from designated ATMs with iris-scanning capabilities – only eighty-nine in a country of more than two thousand ATMs ([GSMA, 2020](#); [HelgiLibrary, 2020](#)). While this made distributions more efficient, it could not support wider financial inclusion. Beneficiaries still had no store of account, and no way to send or receive remittances or to borrow ([Gilert and Austin, 2017](#); [Chehade et al., 2020](#)).

In time, many actors in Jordan started imagining mobile wallets would better ‘financially include’ refugees who were barred from owning bank accounts. But mobile wallets were not yet widely used by Jordanians, limiting the utility of the wallets. By 2018, only 3.5 per cent of Jordanians had wallets ([Central Bank of Jordan, 2021](#)). While that rose to 16 per cent due to the push for digital payments during COVID-19, this was driven overwhelmingly by salary and relief payments from the Government ([JoPACC, 2021](#); [AlSalhi et al., 2020](#)).

Government and international organisations have been pushing for humanitarian payments to be distributed via mobile money to improve the business case for mobile money investments and offer a wider range of financial services to refugees. However, this push has led

providers to focus on building systems to suit large payers (i.e. bulk payments and robust reporting) rather than the needs of recipients ([Hensley, 2020](#)). As a result, pilots distributing aid through mobile money have faced impediments such as network problems delaying transfers, poor outreach in remote areas, lack of cash available for withdrawals and agents overcharging clients ([Halaiqah, 2021](#); [UNHCR, 2021d](#)).

Not only is mobile money perceived as a low-quality solution, but these wallets also have restrictions on balances, transaction sizes and transaction types. Within our research sample, most participants who had opened a mobile wallet did so only if it was a requirement to receive a salary, scholarship, training stipend or monthly cash assistance, and the majority used it only to receive those payments.

Jordan has a strong banking infrastructure, yet refugees are unable to access it due to prohibitive Know Your Customer (KYC) requirements and a range of other de-risking efforts implemented by banks ([Central Bank of Jordan, 2017](#)). Some Syrian refugees in our sample (eight out of forty-four) were able to get a bank account by meeting stringent documentation requirements and obtaining – at least temporarily – formal work. Those trying to formalise and grow businesses were often still rejected from this critical tool for managing business income and expenses.

Having a bank account or a mobile wallet was not the biggest concern of our participants. They worried most about a lack of income inhibiting their ability to meet basic needs in the present and their uncertain legal status affecting their ability to invest in their future. Micro-finance did not serve as a substitute either. Participants in our study did not want formal loans given the scarce investment opportunities and high risks. Those who sought loans needed them for personal or health emergencies. Our research participants saved informally and borrowed from friends, family and neighbourhood stores to meet basic needs and manage short-term risks. This borrowing did not signal latent demand for formal loans, but rather the desperation resulting from precarious livelihoods ([Microfinanza, 2018](#); [UNHCR, 2021a](#)).

Financial Encampment in Kenya

A Broader Paradigm of Exclusion

As in Jordan, Kenya severely restricts refugees’ access to mainstream financial services as an extension of broader policies meant to curb refugees’ movements and ability to work. While the country has a robust mobile money network, refugees have been barred from registration since 2015, so this infrastructure could not be used for aid disbursements. One of the largest transfers became a

voucher distributed through a highly restricted form of M-Pesa – Bamba Chakula. These payments are hived off into this separate, isolated mechanism, which was more like financial encampment than inclusion.

The most important barriers to refugees' self-reliance were restrictions on rights to move freely and work formally, as well as the lack of clarity on their long-term legal status. Many worked informally and ran informal businesses to meet survival needs. They faced severe harassment and precarity created by their legal status. Restrictions on the use of mobile money and other financial services were viewed as more hoops to jump through. Refugees often found illegal means to access key financial services, creating risks for themselves and undermining financial system integrity.

Unlike in Jordan, the Kenyan Government's restrictive and punitive policies towards refugees developed recently, as refugee issues became politicised and securitised in the wake of a number of Al Shabaab terror attacks (Crisp, 2003; O'Callaghan *et al.*, 2019). In 2012, the Department of Refugee Affairs formally adopted the mandatory encampment of all nearly 500,000 refugees, calling for the cessation of all refugee services in urban areas and conducting sweeping refugee roundups in Nairobi ('Petition 19 of 2013 – Kenya Law', 2013). At the time of our study, refugees were allowed to apply for work permits, but our key informants and respondents told us that such permit applications were nearly universally rejected or simply never even processed.

Refugees' access to telecommunications and mainstream financial services was also restricted. In 2015, Kenya implemented a new national identity card required to gain access to financial services and mandatory SIM card registration for mobile devices (Government of Kenya, 2015). Refugee ID cards were no longer accepted, effectively blocking new arrivals (post-2015) from having a fully functional phone line or M-Pesa wallet registered in their own names.¹ While some refugees in Kakuma, where there was a branch of Equity Bank, have been able to get bank accounts, this typically required a letter from an employer (usually a camp-based NGO or UN agency) and additional documents. In 2019, refugees who were using accounts had their access blocked when the Government suddenly began enforcing a requirement for all account holders to have a tax identity number (PIN). Many refugees who attempted to access a PIN were denied by the issuing agency, Kenya Revenue Authority.

In Kenya, bank accounts, but particularly M-Pesa wallets, are critical parts of the economic infrastructure. FinAccess 2021 found that 81 per cent of Kenyan adults actively used mobile money and 44 per cent actively used bank accounts (Central Bank of Kenya, Kenya National Bureau of Statistics, and FSD Kenya, 2021). Mobile

money was the most frequently used financial service, with more than 60 per cent of users using the service at least daily or weekly for a range of use cases: person to person transfers, humanitarian cash payments, salary payments, retail payments, savings and credit (Central Bank of Kenya *et al.*, 2021). Blocking refugees from participating in this financial network was an important form of exclusion.

There have been some signs of a shift in Kenya's policy orientation. In the 2019 *Kampala Declaration on Jobs, Livelihoods and Self-Reliance*, the Government committed to strengthen freedom of movement, expand access to labour markets and improve access to services in health, education, financial services and markets (Inter-Governmental Authority on Development, 2019). In 2020, the Government released an updated draft of its Comprehensive Refugee Response Framework (CRRF), and in late 2021, the President signed the 2021 Refugee Act, making broad commitments to facilitating refugees' rights to work. The Act has retained provisions forcing refugees to live only 'in designated areas' and was silent on access to M-Pesa (Government of Kenya, 2021). New commitments have been overshadowed by threats to close the country's refugee camps by June 2022 (UNHCR, 2021b; Wambui, 2021).

What Use Is Finance without Foundations?

Refugees in Kenya were encouraged to be self-reliant yet stymied in those pursuits. Pushed into informal and precarious work, financial services had limited ability to support livelihoods. Even day-to-day cash management through mainstream financial services was hindered by blocking refugees' use of M-Pesa and banking services.

One example in Nairobi was Philip, a 38-year-old refugee from Congo. He has tried all the proper avenues to work throughout his ten years in the city, getting blocked at every turn. A skilled French teacher, he at one time had a job at a local private school teaching French. However, when the school determined that all teachers needed registration with the Kenyan Teaching Service, Philip was denied the ability to register, due to his refugee status. He lost that job. When he tried to drive for Uber and Bolt (two large ride-hailing firms), they also did not let him register without a Public Service Vehicle badge, accessible with a specific kind of background check only available to Kenyans.

Another participant was thrilled to receive support from a well-wisher to go to culinary school. Unable to secure a work permit, he used a Kenyan friend's ID to get a job at a high-end hotel in Nairobi. He was fired when management learned he was a refugee working with a fraudulent ID. In such an environment, refugees cannot fully benefit from their own and donors' human capital investments.

In Kakuma, refugees had somewhat more freedom to start their own businesses with less harassment from county council officials and the police. Still, they were not able to leave the camps easily for business or to pursue professional opportunities. Susan, a 25-year-old mother of two, had an incentive pay job as a teacher in a camp school. However, due to the UNHCR's euphemistic 'wage harmonisation' scheme, she only earned about US \$60 per month, which was about the maximum *any* professional job in the camp was allowed to pay. To try and build a better life for herself and her kids, she ran a wholesale *changaa* (homemade alcohol) business with the support of her family. But Susan had no idea what would come next, which made it very difficult to plan a life. She was born in the camp, had never left, and dreamed of one day just being able to visit Nairobi to see what might be possible in a different kind of life. It wasn't a lack of financial services standing between Susan and the 'dignity' outcomes that self-reliance approaches have sought to secure.

Financial exclusion was more a costly nuisance than a fundamental barrier to livelihoods. As refugees were blocked from M-Pesa since 2015, those who arrived later either went without this fundamental tool, relied on others to transact on their behalf or borrowed the ID of Kenyan friends and acquaintances to fraudulently register their own accounts. This came with risks. Aid agencies still sent transfers through M-Pesa in the city using intermediaries or fraudulently registered accounts. Those who relied upon intermediaries were sometimes charged a convenience fee, payments could be delayed and the privacy of the payment was immediately violated by the transfer. Those without accounts could not use M-Pesa to save, borrow or even carry money securely. One participant, a 26-year-old Ethiopian woman, told us how jealous she was of Kenyans' access to M-Pesa. For her, an account would mean she had a safe place to keep money given that she had to share her flat with several friends in order to afford rent. Several of our participants lost their meagre cash savings to theft by desperate housemates.

About a third of our research participants in Nairobi accessed M-Pesa using fraudulent documentation, leading to inconveniences for users and undermining the integrity of registration systems. These users could only withdraw from limited agents who knew and trusted them as they are unable to show the IDs tied to the account. A few participants had their SIM cards and M-Pesa accounts blocked when Safaricom, the largest mobile network operator in Kenya, thought the accounts were not properly registered. One respondent lost his US \$18 balance when his account was switched off. Those who allowed them to use their IDs sometimes revoked access. One respondent running a small, informal business was trying to negotiate continued access to

M-Pesa with a Kenyan friend who allowed him to register with his ID. 'Safaricom told him it is illegal and he will be responsible in case the line is used for anything bad and they decide to investigate it. Since he heard that, he changed his mind.'

Not having access to M-Pesa also meant losing economic opportunities, even if it did not completely undermine livelihoods. One participant who worked illegally as a mechanic found that he was underpaid without an M-Pesa account. Since he worked informally, sometimes his employer denied paying him in full. Some clients offered to pay him directly on M-Pesa. 'When I say I do not have [an M-Pesa account], they cannot understand and decide to give me just a little amount.' Afraid of causing confrontations and losing his livelihood, he chose to keep quiet and avoid fights. 'It's my way of protecting myself and my job.'

Financial Access without Inclusion

A consortium of humanitarian agencies including UNHCR, ILO and FSD Africa have sought to offer some forms of financial access around government restrictions by helping microfinance institutions (MFIs) reach and lend to refugee clients. MFIs do not face the same government restrictions on KYC regulations that restrict refugees' access to mobile money and mainstream banking. However, similar to Jordan, given underlying forms of economic exclusion, the share of refugees who could benefit from business growth loans offered by MFIs – as opposed to the payments, savings and short-term consumption credit offered by M-Pesa – is quite small. Only a few have been able to overcome the obstacles in the way of investing in a growing business, given police harassment, movement restrictions and long-term uncertainties about their legal presence in the country. In such a context, some worry that expanding access to high-cost credit could do harm to an already vulnerable population who turn to debt out of desperation rather than to pursue opportunity (Bhagat and Roderick, 2020).

Humanitarian actors seeking to leverage the country's financial infrastructure to serve refugee clients have also been stymied. WFP for example, sought to shift their food distributions towards digital cash payments in Kenya's refugee camps. However, the Government forbid payments to refugees over mainstream M-Pesa accounts, forcing the organisation to invest in a separate closed-loop voucher system, not unlike the closed, cash out-only distributions in Jordan.

While it operates via Safaricom and ostensibly on M-Pesa infrastructure, the voucher system shows little resemblance to the payments system as it operates for Kenyans. Refugees' Bamba Chakula SIM card cannot make or receive calls, make or receive payments, accept

deposits or request for credit (GSMA, 2017). Rather than serving as an on-ramp to include refugees in the financial system, Bamba Chakula is a form of financial encampment, keeping refugees in a separate, second-rate system, apart from the rest of the Kenyan economy. Unlike Jordan, where refugees receive actual cash payouts, this restrictive system means that food vouchers refugees receive can only be redeemed at a set of approved vendors rather than used throughout the camp economy, seeding the livelihoods of other refugee families. While touted as a success story of financial inclusion, it is anything but. While participants in our study were grateful to receive the food voucher, they continued to face major barriers to building livelihoods and accessing mainstream financial services.

Conclusions

Our research in Jordan and Kenya shows that current approaches to financially including refugees were not in themselves inclusive and could not support self-reliance. Both countries host large numbers of refugees and are touted for innovations in digital finance, especially in the distribution of digital humanitarian transfers and 'financial inclusion'. In both countries, restrictions on refugees' economic rights – de facto rights to move, work, run businesses and plan for the future – inhibit meaningful advances in self-reliance. In such contexts, financial services can play only a minor role in advancing livelihoods. And even then, it will be most useful when refugees can access mainstream services that connect them to local and international systems so they can receive payments, keep money safe and manage short-term cash flows.

Neither Kenya nor Jordan has actually provided that access. Instead, donors have shifted to digital humanitarian payments primarily through segregated, second-rate financial service ghettos. In Jordan, refugees are offered access to mobile wallets on a mobile money system that is new and does not connect refugees to the local economy. In Kenya, refugees are de jure banned from the mainstream economic infrastructure of M-Pesa. The informal and illegal workarounds refugees use – and humanitarian actors leverage for distributions in Nairobi – pose important risks to refugees' who can lose access at any moment and who can be exploited by relying on others to transact on their behalf. What kind of ethics are at play when humanitarian players concede to 'inclusion' through informal workarounds, entailing important risks to refugees.

Humanitarian actors, donors and host governments appear eager to invest in 'financial inclusion' programming under the banner of self-reliance in spite of these highly restrictive environments. Can financial services

realistically alleviate precarity for refugees who are still legally restricted from pursuing livelihoods? Under what conditions might advancing financial services deliver real gains for refugee communities? By embracing finance as a technical solution to protracted displacement, humanitarian players push tough political questions about ensuring refugee rights further out of view. Our findings suggest being more honest about what financial services can do in places where fundamental rights are missing and potentially focusing financial inclusion investments in countries where refugees are allowed to work.

Digitising cash transfers can bring greater efficiencies to aid distribution and greater dignity and choice for recipients. However, humanitarian players should be attentive to the risk of building parallel financial systems that further entrench economic exclusion. They should also be aware of the risk of distorting incentives in nascent ecosystems by encouraging providers to view humanitarian agencies – not beneficiaries – as their clients.

The theory of change of financial inclusion where refugees leverage financial services to support livelihood investments assumes some predictability of refugees' futures. That did not exist for those in our study, who were either hoping to be resettled to a third country or feared being sent back to their home country and losing their investments.

Efforts to advance financial inclusion for refugees have run head on into a conflict between inclusive rhetoric and a dominant hosting paradigm of exclusion and isolation. While trying to be helpful, humanitarian players have opted for technical solutionism that exaggerates what is possible for financial services to achieve in contexts where refugees still have very few rights to participate in economic life.

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Notes

1 Passports were still accepted for registration. The small share of refugees with their home country passport were still allowed to use the service. This was rare. Refugees with passports were also very afraid of being 'caught' with a passport.

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