

# Pathways to Employment

## Libya Report

# About the Authors

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## About the RLRH

The Refugee-Led Research Hub (RLRH) is an initiative of the Refugee Studies Centre (RSC) at the University of Oxford. The RLRH is based in the UK and Kenya, with a research office located in Nairobi at the British Institute in Eastern Africa (BIEA). We create opportunities for researchers with a displacement background to lead primary and secondary research studies in the field of forced migration, from start to finish. Our main thematic interests in Refugee Studies relate to 1) livelihoods and self-reliance; and 2) leadership and participation of displaced populations in humanitarian response and policymaking. RLRH also offers a series of academic programmes which support graduate access and professional development for students with lived experiences of displacement. Visit [our website](#) for more information.

## About the Author

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# Introduction

# Executive Summary

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- Libya is a country of destination and transit for individuals travelling from North Africa to Europe. The majority of migrants arriving in Libya are economic migrants seeking better employment prospects and forcibly displaced persons seeking protection.
- Libya is not a signatory to the 1951 convention and its 1967 protocol. However, it is a party to the 1969 Convention of the Organization of the African Union (OAU) governing the specific aspects of African refugee problems, a regional complement to the 1951 Convention. Nevertheless, the Libyan government has yet to enact the 1969 OAU Convention, as it lacks the legislative framework necessary to address the issue of refugees at the national level
- The government has established detention centres for the purpose of detaining refugees, asylum seekers, and other migrants who lack the requisite documentation to justify their presence in the country. However, the government has also been arbitrarily detaining asylum-seekers and refugees holding UNHCR certificates/documents.
- All non-Libyans are subject to Libyan immigration regulations, which offer no protection for refugees.
- While Article 9 of Law No. 12 of 2010 on labour relations requires all foreigners to obtain a work permit from the Ministry of Labour in order to have access to employment, it is unclear how refugees can access formal employment in Libya, as this law does not mention refugees.
- As a result, refugees in Libya do not have access to formal employment. They mostly engage in informal work, in the fields of construction, metal industry, cleaning, mechanics, porters, agriculture and restaurants.
- There is no private sector's involvement in employing refugees. There are also no particular collaborations among different stakeholders aimed at ensuring refugees access employment.
- This report suggests that the government of Libya clarify how refugees can access work permits like other foreigners.

# Acronyms

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<b>OAU</b>	Organisation of African Unity
<b>RLRH</b>	Refugee-Led Research Hub
<b>UNHCR</b>	United Nations High Commissioner for Refugees

# Libya Situation Snapshot

## Country assessment:

- Limited information available publicly
- Highly restrictive legal environment

**Libya is generally a transit country for individuals travelling from North Africa to Europe.**<sup>1</sup> The majority of migrants arriving in Libya are economic migrants seeking better employment prospects<sup>2</sup> and forcibly displaced persons seeking protection.<sup>3</sup> As of 31 March 2025, there were 88,283 individuals registered as refugees or asylum seekers in Libya.<sup>4</sup> Refugees and asylum seekers mostly come from Sudan (66,716), followed by Eritrea (8,995), Syria (7,292), Ethiopia (2,311), South Sudan (1,509), Somalia (674), Palestine (566), Iraq (106), Yemen (91), and the remainder (23) from various other countries. There is no available nationality breakdown between refugees and asylum seekers. However, with an estimated 277,000 refugees and asylum seekers by the end of 2024, Libya is home to more than twice the number of recognised refugees and asylum seekers registered by UNHCR.<sup>5</sup>

Additionally, the country has a considerable number of internally displaced persons (IDPs), estimated at 32,791.<sup>6</sup> UNHCR has reported approximately 98,700 new arrivals from Sudan since April 2023.<sup>7</sup>

**There are no refugee camps in Libya;** the last one was closed in 2004.<sup>8</sup> Instead, government has established detention centres for the purpose of detaining refugee,<sup>9</sup> asylum seekers, and other migrants who lack the requisite documentation to justify their presence in the country.<sup>10</sup> The Department for Combating Illegal Migration (DCIM) oversees these centres, though few are run by militias, and those detained are subjected to mistreatment and abuse.<sup>11</sup>

**Refugees in Libya do not have access to formal employment.**<sup>12</sup> A study conducted in 2017 by REACH revealed that refugees living in the cities mostly engage in informal work, in the fields of construction, metal industry, cleaning, mechanics, porters, agriculture and restaurants.<sup>13</sup>

1. UNHCR, "Annual Results Report," 2022. <https://reporting.unhcr.org/sites/default/files/2023-06/MENA%20-%20Libya.pdf>

2-3. Ibid

4. UNHCR, "Libya: Operational Data Portal." Accessed on April 21, 2025. <https://data.unhcr.org/en/documents/details/115522>

5-6 Ibid

7. UNHCR, "Sudanese Refugees and Asylum-Seekers in Libya," 1 October 2024. <https://data.unhcr.org/en/documents/details/111494>

8. "World Refugee Survey 2009 - Libya | Refworld." Accessed August 16, 2024.

<https://www.refworld.org/reference/annualreport/uscrr/2009/en/66429>

9. UNHCR, "UNHCR steps up efforts towards alternatives to detention in Libya and solutions for vulnerable refugees." 12 September 2017. <https://www.unhcr.org/news/news-releases/unhcr-steps-efforts-towards-alternatives-detention-libya-and-solutions>

10. Assessment of Priorities for the Development of Libya's Migration Policy: A Strategic Vision 2014. Retrieved from iom.int: <https://publications.iom.int/books/assessment-priorities-development-libyas-migration-policy-strategic-vision>; International. "Libya: New Evidence Shows Refugees and Migrants Trapped in Horrific Cycle of Abuses," September 24, 2020. <https://www.amnesty.org/en/latest/press-release/2020/09/libya-new-evidence-shows-refugees-and-migrants-trapped-in-horrific-cycle-of-abuses/>.

11. UNHCR. (2024) Annual Results Report - 2024 Libya, unhcr.org. Available at:

<https://www.unhcr.org/sites/default/files/2025-06/Libya%20ARR%202024.pdf>. (Accessed: 31 July 2025).

"Libya Immigration Detention Profile – Global Detention Project | Mapping Immigration Detention around the World." Accessed August 16, 2024. <https://www.globaldetentionproject.org/countries/africa/libya>

12. United States Committee for Refugees and Immigrants, World Refugee Survey 2009 - Libya, 17 June 2009, <https://www.refworld.org/reference/annualreport/uscrr/2009/en/66429> [accessed 03 October 2024]

13. REACH and Start network, Refugees and migrants' access to resources, housing and healthcare in Libya - key challenges and coping mechanisms, December 2017 - Libya. ReliefWeb. (2018, January 15). <https://reliefweb.int/report/libya/libya-refugees-and-migrants-access-resources-housing-and-healthcare-libya-key>

# Objectives & Research Methods

This study intended to examine the process of hiring refugees, with a focus on the gaps that exist between policy and practice, and on how the private sector can be meaningfully engaged in this process, by asking:

1. What policies and legal frameworks govern refugees' access to employment in Libya?
2. What processes do refugees need to follow to find employment in Libya? What challenges do refugees face in following the required steps to employment in Libya?
3. What are the challenges private sector actors face in order to employ refugees in the different countries in Libya?
4. How can collaboration and partnerships between stakeholders can be improved to create a more enabling environment for refugee employment in Libya?

Ultimately, the study aims to support the Mastercard Foundation and the Amahoro Coalition to achieve their shared vision of promoting dignified and fulfilling livelihoods for refugees and displaced persons through multi-sectoral engagement in Africa.

**This study, conducted in partnership with the Mastercard Foundation, supports the Amahoro Coalition's mission to promote dignified and fulfilling livelihoods for refugees and displaced persons across Africa through multi-sectoral collaboration. It aligns with the Foundation's strategic objective of enabling 2.5 million young refugees and displaced individuals to access meaningful employment by 2030.**

**The research examines current policies, challenges, and opportunities affecting refugees' access to formal employment in host countries, identifying key barriers and recommending strategies to strengthen employment pathways and promote socio-economic integration into host communities. The views expressed herein do not necessarily represent those of the Mastercard Foundation, its staff, or its Board of Directors.**

## Research Methods

This Libya report is part of a 15-country study on hiring refugees, conducted by the Refugee-Led Research Hub, on behalf of the Amahoro Coalition. The report is entirely based on secondary sources. This report does not provide a complete picture of refugee employment in Libya, but is intended to be useful as a basis for discussion and advocacy.



Photo by Aboodi Vesakaran

# 1. Policies and Legal Frameworks

# Overview of Policies and Legal Frameworks in Libya

**Libya is not a signatory to the 1951 convention and its 1967 protocol.**<sup>14</sup> However, it is a party to the 1969 Convention of the Organization of the African Union (OAU) governing the specific aspects of African refugee problems, a regional complement to the 1951 Convention. Nevertheless, the Libyan government has yet to

enact the 1969 OAU Convention, as it lacks the legislative framework necessary to address the issue of refugees at the national level.<sup>15</sup> Additionally, Libya has ratified the 1954 Convention Relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness.<sup>16</sup>



Tripoli, Libya. Photo by Mohaned Eribi

14. UN High Commissioner for Refugees (UNHCR), UNHCR Submission for the Universal Periodic Review – Libya – UPR 36th Session (2019), October 2019, <https://www.refworld.org/policy/upr/unhcr/2019/en/123102>

15-16. Ibid

# Overview of Policies and Legal Frameworks in Libya

**Despite not being a signatory to the 1951 convention, the Libyan government allows UNHCR to do the registration<sup>17</sup> and documentation process for refugees.<sup>18</sup>**

UNHCR does not conduct registration activities in detention centers; instead it advocates for asylum seekers and refugees to be released from the detention centers by the Libyan government. UNHCR also supports the removal of refugees from detention centres so as to register and settle them in urban settings.<sup>19</sup> Refugees receive a UNHCR asylum seeker certificate or a UNHCR certificate upon registration, which serves as their identity document and confirms that a person is under UNHCR protection.<sup>20</sup> However, the government has been arbitrarily detaining asylum-seekers and refugees holding UNHCR certificates or documents.<sup>21</sup>

**Although Article 10 of Libya's 2011 Interim Constitutional Declaration guarantees the right to asylum, there is currently no national asylum legislation or established asylum procedures in place.<sup>22</sup>** In practice, Libya considers refugees and asylum seekers as illegal migrants.<sup>23</sup>

All non-Libyans are subject to Libyan immigration regulations, which offer no protection for refugees.<sup>24</sup> Currently, Article 9 of Law No. 12 of 2010 on labour relations requires all foreigners to obtain a work permit from the Ministry of Labour in order to have access to employment.<sup>25</sup> It is unclear how refugees can access formal employment in Libya, as this law does not mention refugees. The freedom of movement of refugees and asylum seekers within the country is also negatively affected, and individuals are at a consistent risk of arbitrary arrest, detention, and deportation,<sup>26</sup> because of the intensified restrictions on migrants in Libya.<sup>27</sup>

**In addition, refugees and asylum seekers have no legal rights to education, healthcare and other services.<sup>28</sup>** There is no evidence in the literature that refugees can access financial services in Libya, or that they can get their certificates or diplomas recognised. Humanitarian organisations that have been providing food, housing, and health services to both refugees and asylum seekers have been targeted by the Libyan government.

17. "Registration - UNHCR Libya." Accessed April 23, 2025. <https://help.unhcr.org/libya/registration/>.

18. IOM, "Assessment of Priorities for the Development of Libya's Migration Policy: A Strategic Vision," 2014. [https://publications.iom.int/system/files/pdf/libya\\_rapid\\_assessment.pdf](https://publications.iom.int/system/files/pdf/libya_rapid_assessment.pdf)

19. UNHCR, "Libya Annual Report 2023," [https://reporting.unhcr.org/sites/default/files/2024-06/MENA%20-%20Libya%20ARR%202023\\_0.pdf](https://reporting.unhcr.org/sites/default/files/2024-06/MENA%20-%20Libya%20ARR%202023_0.pdf)

20. "Registration - UNHCR Libya." Accessed April 23, 2025. <https://help.unhcr.org/libya/registration/>.

21. UNHCR, "Submission by the United Nations High Commissioner for Refugees For the Office of the High Commissioner for Human Rights' Compilation Report Universal Periodic Review: 3rd Cycle, 36th Session," 2019.

[https://upr-info.org/sites/default/files/documents/2021-04/unhcr\\_upr\\_submission\\_on\\_libya\\_36th\\_session.pdf](https://upr-info.org/sites/default/files/documents/2021-04/unhcr_upr_submission_on_libya_36th_session.pdf)

22. UNHCR, "Annual Results Report," 2022. <https://reporting.unhcr.org/sites/default/files/2023-06/MENA%20-%20Libya.pdf>

23. UN High Commissioner for Refugees (UNHCR), UNHCR Submission for the Universal Periodic Review – Libya – UPR 36th Session (2019), October 2019, <https://www.refworld.org/policy/upr/unhcr/2019/en/123102>

24. Ibid

25. Law No. 12 of 2010 on the Promulgation of the Labour Relations Act. [https://security-legislation.ly/latest-laws/law-no-12-of-2010-on-labour-relations-and-its-by-law/#:~:text=Introduction-,Article%20\(1\),may%20be%20among%20non%20Libyans.](https://security-legislation.ly/latest-laws/law-no-12-of-2010-on-labour-relations-and-its-by-law/#:~:text=Introduction-,Article%20(1),may%20be%20among%20non%20Libyans.)

26. UNHCR, "Annual Results Report," 2022. <https://reporting.unhcr.org/sites/default/files/2023-06/MENA%20-%20Libya.pdf>

27. Amnesty International, "Libya: Unlawful lethal force and mass arrests in unprecedented migrant crackdown," 8 October 2021.

<https://www.amnesty.org/en/latest/news/2021/10/libya-unlawful-lethal-force-and-mass-arrests-in-unprecedented-migrant-crackdown/>

28. UNHCR, "Annual Results Report," 2022. <https://reporting.unhcr.org/sites/default/files/2023-06/MENA%20-%20Libya.pdf>; US

Department of state, "2023 Country Reports on Human Rights Practices: Libya," <https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/libya>

# Overview of Policies and Legal Frameworks in Libya

**Consequently, the government has recently banned 10 organisations to operate in Libya,** namely International Relief Organization, Norwegian Refugee Council (NRC), Italian Human Land Organization, International Medical Organization, Organization of the Danish Council, French Association of Doctors Without Borders, The German Care Organization, Inter Sos Italian Organization (INTERSOS), ACTED ORGANIZATION, and Italian Chezfi Organization. The UNHCR may also face the same ban.<sup>29</sup> This ban has made the lives of asylum seekers and refugees in Libya even more difficult, especially those who relied on aid from banned organisations.

This ban has made the lives of asylum seekers and refugees in Libya even more difficult, especially those who relied on aid from banned organisations.



Migrant in Libya. Photo by Moayad Zaghdani

29. Relief web, "Libya: Stop the crackdown on NGOs supporting migrants, refugees and asylum seekers," April 2025. Accessed on 23 April 2025. <https://reliefweb.int/report/libya/libya-stop-crackdown-ngos-supporting-migrants-refugees-and-asylum-seekers>

# Other Challenges

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## Challenges faced by refugees in accessing formal employment in Libya

Refugees in Libya do not have the right to work according to a 2009 report by UNHCR.<sup>30</sup> The country has a reservation specifically for Palestinian and Iraqi refugees to run businesses as mentioned in the 1965 Casablanca Protocol, a binding protocol that aims at regulating and harmonising protection of Palestinians including Palestinian refugees in all Arab signatory countries.<sup>31</sup> The government has provided guidelines on the application procedures for [hiring permit](#) and [business registration](#) online.<sup>32</sup> However, there is no evidence in literature indicating whether Palestinian refugees are allowed to go through the indicated procedures to access employment or registering businesses.

There is no evidence in the literature that refugees are engaged in other alternatives to formal employment, such as remote work, entrepreneurship, and voluntary work with humanitarian organizations where they can be paid incentives rather than a salary.

## Challenges hindering private sector actors and other employers to employ refugees in Libya

**There is no information in literature on the private sector's involvement in employing refugees.** This is because of the detention policy in Libya, where refugees are not allowed to move freely or access formal employment.

## Collaborations and partnerships in Libya

**The Libyan government has not implemented any measures aimed at enhancing and facilitating refugees' opportunities for employment.** From the 2023 report, UNHCR collaborated with several Libyan authorities in the hope of improving the support and protection provided to refugees.<sup>33</sup> While that support is aimed at protection and general support, no particular collaborations are aimed at ensuring refugees access employment.

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30. United States Committee for Refugees and Immigrants, World Refugee Survey 2009 - Libya, 17 June 2009, <https://www.refworld.org/reference/annualreport/uscir/2009/en/66429> [accessed 03 October 2024]

31. Protocol for the treatment of Palestinians in Arab States ("Casablanca protocol"). Refworld. (1965, September 11). <https://www.refworld.org/legal/agreements/las/1965/en/36716>

32. Libya, Information portal: <https://eirat.gov.ly/objective/6?l=en>

33. UNHCR, "Libya Annual Results Report 2023," [https://reporting.unhcr.org/sites/default/files/2024-06/MENA%20-%20Libya%20ARR%202023\\_0.pdf](https://reporting.unhcr.org/sites/default/files/2024-06/MENA%20-%20Libya%20ARR%202023_0.pdf)

## 2. Recommendations

# Recommendations for Libya

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**The government should clarify how refugees, like other foreigners, can access work permits.** While Article 9 of Law No. 12 of 2010 on Labour Relations requires foreigners to obtain a work permit to access formal employment in Libya, this law is silent on refugees' access to work permits. The government should reconsider its position that all refugees and asylum seekers (both registered and unregistered) are illegal migrants and, at a minimum, treat registered refugees in the same way as legal foreigners in the country in terms of access to formal employment. However, given that refugees may not meet all the requirements for access to work permits in Libya, the government should aim to set specific requirements for refugees that most registered refugees can meet. For example, instead of requiring refugees to have a passport, UNHCR-issued refugee identity cards should be sufficient.

**Donors should be prepared to fund data collection activities if and when the context of the refugee response becomes conducive to it.** Given the limited literature on refugees' access to formal employment in Libya, there is a need to collect primary data to fill the following gaps through informant interviews in order to explore:

- Refugees' experiences (if any) accessing remote work, entrepreneurship opportunities, and other alternative livelihood options.
- Existing support that refugees get from the UNHCR aimed at enabling refugees to engage in entrepreneurship.



Photo by Ahmed Almahzanji