





About the Authors

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 Fastern 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 professional development for students with lived experiences of displacement. Visit our website for more information.

About the Author

Buhendwa Iraqi is a researcher and advocate for the rights of refugees, with lived experience of displacement. He is currently a Research Officer at the Refugee-led Research Hub (RLRH). His background is in International Relations and Security Studies from Daystar University, Nairobi, Kenya. Prior to RLRH, he worked for Amnesty International-Great Lakes, East and Horn of Africa Region, focusing on advocacy, campaigning and research refugees and migrants. He is the co-founder of RUSEP, a refugee-Kenyan led organisation that promotes vouth innovation, arts, entrepreneurship and research. You can reach him at: buhendwa.iraqi@refuqeeledresearch.org

About the Research Assistant

Simon Marot Touloung is the co-founder and team leader of the African Youth Action Network

(AYAN), is a social enterprise dedicated to peace building and economic empowerment of refugee youth in Uganda. As a refugee, Marot is committed to working towards a world free of violence and conflict. Marot is also an Advocacy Coordinator at the Global Youth Network (GRYN), an independent refugee youth-led organisation that empowers and supports refugee youth to respond to challenges in their communities. Marot obtained a B.Sc. in Petroleum Geoscience and Production from Makerere University through a DAFI scholarship. He is currently pursuing an MSc. in Energy Economics and Governance at Makerere University Business School - Kampala. You can reach him at: touloung45@gmail.com

Acknowledgements

Simon Marot Toulong collected the data in Uganda. The author (Buhendwa Iragi) is grateful for the support provided by the Refugee-Led Research Hub during data collection and report writing, in particular Mohamed Hassan, Fardosa Salah, Uwezo Ramazani, and Grace Isimbi. Pauline Vidal and Winnie Makau provided feedback on early stages of the draft.

The team benefited greatly from the support provided by the Amahoro Coalition. In particular, we thank Nada Abshir, Tilda Mwai and Julius Muriuki.

Most of all, we are grateful to fellow refugees and stakeholders who took the time to engage with us as respondents in Uganda.

How to Cite

Iragi, B. (2024) 'Pathways to formal employment in Uganda.' Amahoro Coalition and the Refugee-Led Research Hub, October 2024.



Table of Contents

Introduction	4
Executive summary	5
Acronyms	7
Uganda situation snapshot	9
Objectives	10
Research methods	1′
1. Policies and legal frameworks that govern refugees' access to employment	12
Overview of policies and legal frameworks in Uganda	13
Changes in Policy	17
2. Processes to obtain work permits	18
Conventional travel document	19
Business licences	22
Challenges faced by refugees	23
3. Challenges faced by private sector actors and other employers to employ refugees	26
4. Collaborations and partnerships in Uganda	29
High-level collaborations	30
5. Recommendations	32
Conclusion	33
Recommendations for Uganda	34
Annexes	36
Annex 1: Citizenship application requirements	37
Annex 2: CTD application form	39
Annex 3: Business licence required documents	42
Annex 4: Large scale projects	46

Introduction



Executive Summary

- Uganda has a progressive policy environment towards refugees, guided by the 2006 Refugee Act and the 2010 Refugee Regulations. Refugees are allowed to move freely within the country, have the right to work, open businesses, own land, access public services, open bank accounts and access loans.
- According to the Ministry of Internal Affairs, refugees are required to obtain work permits, but the requirements are not clearly outlined in any available source or regulation. Refugees must first obtain a Conventional Travel Document (CTD) and then obtain a work permit stamp from the MIA. There are significant delays in obtaining a CTD and the cost can be prohibitive for many refugees, especially those living in settlements (around USD 60 and travel to Kampala). There are no guidelines on how to obtain the work permit stamp from the Ministry of Home Affairs, and the team was unable to identify any refugees who had attempted to apply for the work permit stamp, even those working in the formal sector. No data is available on the number of refugees who obtained a work permit in Uganda.
- In practice, refugees tend to work without work permits, and employers may not require them because they are not mentioned in the 2006 Act and 2010

- Regulations. Lack of a work permit can be a barrier to employment if employers require one.
- Refugees face challenges in accessing formal employment due to their status and the structural lack of formal job opportunities. Only 29% of refugees are actively working compared to 64% of the host community actively working.¹ Few refugees have access to university and are therefore unable to compete in the formal labour market. Refugees who do find work tend to work below their skill level and earn lower wages than Ugandans
- Discrimination significant remains obstacle Private employment. companies often require considerable before considering advocacy refugees, even when they provide services to refugees. Aid organisations continue to engage refugees as volunteers incentive workers. with limited remuneration and restricted access to senior leadership positions.
- On the other hand, the process of obtaining a business licence is described as straightforward. However, refugee entrepreneurs struggle with the hidden costs of business licences and may struggle to access loans.



Executive Summary

- There is evidence of collaboration between the private sector, government and humanitarian organisations, although the involvement of the private sector is not significant. Initiatives that involve direct engagement with the private sector through job matching and apprenticeships are promising, as they can both create jobs for refugees and break down barriers created by discrimination for employers.
- The recommends that the report government remove the requirement for refugees to obtain work permits to access formal employment, that refugee support apprenticeship organisations expand programmes and provide tangible incentives for the private sector to recruit refugees, and that donors support initiatives that improve refugee access to university (whether through scholarships or by supporting blended degree programmes).

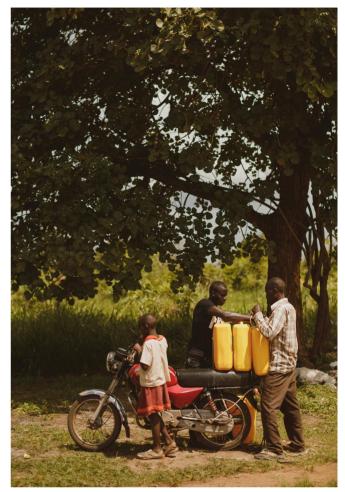


Photo by illustrate Digital Ug



Acronyms

CTD	Conventional Travel Document
DRC	Democratic Republic of the Congo
ICESCR	International Covenant on Economic, Social and Cultural Rights
ID	Identity Document
ILO	International Labour Organization
IRC	International Rescue Committee
INGO	International Non-governmental organisation
JLIRP	Jobs and Livelihoods Integrated Response Plan
KCCA	Kampala Capital City Authority
MIA	Ministry of Internal Affairs
MFIs	Micro-Finance Institutions
MGLSD	Ministry of Gender, Labor and Social Development
NGO	International Non-governmental organisation
NCHE	National Council for Higher Education



Acronyms

NDP	National Development Plan
NSSF	National Social Security Fund
ОРМ	Office of the Prime Minister
RIN	Refugee Investment Network
RUFI	Rural Finance Initiative
RLO	Refugee-Led Organisation
UNEB	Uganda National Examinations Board
URA	Uganda Revenue Authority
URSB	Uganda Registration Services Bureau
UNDP	United Nations Development Programme
UCICA	Uganda Citizenship and Immigration Control Act
UNHCR	United Nations High Commissioner for Refugees
UHOA	Uganda Hotel Owners Association
WIU	Windle International Uganda



Uganda Situation Snapshot

Country assessment:

- Open legal environment, with significant gaps between policy and practice
- Comprehensive literature available publicly, fewer gaps in knowledge compared to other countries in Africa



Photo by Timothy Nkwasibwe

Uganda is currently the largest hosting country in Africa for refugees, and hosts 1,656,423 refugees and 45,855 asylum seekers. as of June 2024.² The majority of refugees come from South Sudan (56.6%) and the Democratic Republic of the Congo (DRC, 31.1%) and the remaining percentage is spread across other nationalities including Somalia, Eritrea, Burundi, Rwanda, Sudan, Ethiopia, and others.³ Uganda has experienced an influx of new arrivals in 2022-2023 due to the ongoing protracted internal conflicts in neighbouring countries such as the DRC and South Sudan, as well as instability in other countries in the Horn of Africa. In 2023, Uganda received 73,460 new arrivals,4 and by the end of January 2024, UNHCR had recorded a total of 27,772 additional new arrivals.5

The large majority of refugees in Uganda reside in refugee settlements. There are 13 refugee settlements across 11 districts within the country in which 92% of refugees reside. Only about 200,000 refugees reside in urban centres, which represents 8% of the total caseload. Refugees often choose to remain in settlements rather than urban areas, because they are reluctant to lose access to formal camp-based assistance.

https://www.cgdev.org/sites/default/files/2022-global-refugee-work-rights-report.pdf

^{2.}UNHCR. "Refugee Response Portal." Accessed on 11 March 2024. https://data2.unhcr.org/en/country/uga

^{4.} UNHCR, "Global Focus UNHCR Operations Worldwide Uganda." Accessed on 11 March 2024. https://reporting.unhcr.org/operational/operations/uganda#:~:text=From%20 January%20to%20September%202023,225%2C000%20new%20arrivals%20since%202022.

^{5.} UNHCR, "Operational Data Portal-Uganda Refugee Response." Refugee influx Dashboard Accessed on 11 March 2024. https://data.unhcr.org/es/dataviz/68

^{6.} Government of Uganda Refugee Response Monitoring System, "Settlement Profile." Accessed on 11 March 2024. <a href="http://urrms.opm.go.ug/settlement.html#:~:text=Some%20refugees%20have%20settlement%20on.and%20supervising%20the%20settlement%20on.and%20on.and%20on.and%20on.a

^{7.} UNHCR. "Refugee Response Portal." Accessed on 13 September 2023. https://data2.unhcr.org/en/country/uga

^{8.} Ginn, Thomas, Reva Resstack, Helen Dempster, Emily Arnold-Fernández, Sarah Miller, Martha Guerrero Ble, and Bahati Kanyamanza. "Global Refugee Work Rights Report." Center for Global Development, 2022.



Objectives

While refugee policy in Uganda is progressive, non-legal challenges persist and refugees struggle to make a decent living.

Refugees in Uganda have the right to work, start businesses, and can access public services such as schools and health facilities.9 However. they are less likely to be employed than host community members because of disadvantages related to their refugee status. According to the United Nations High Commissioner for Refugees (UNHCR), only 29% of refugees in Uganda are actively working (compared to 64% among the host community). 10 When they do work, it is often below their skill level. 11 As few refugees are able to access employment opportunities in a competitive job market, they instead engage in self-employment, where they often make little money.¹² Refugees also often work in sectors where wages are low, such as the agricultural sector: approximately 78% of refugees living in rural settlements work in agriculture. 13 Despite being provided with land by the Ugandan government, refugees in settlements still face poor housing conditions, insufficient access to land for agricultural purposes, and ongoing land and resource disputes.¹⁴ Besides agriculture, refugees in camps and urban areas operate in the service industry, such as "bars, hair dressina. milling, transportation, transfers, and retail."15

In light of those challenges, this study aims 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 Uganda?
- 2. What processes do refugees need to follow to find employment in Uganda? What challenges do refugees face in following the required steps to employment in Uganda?
- What are the challenges private sector actors face in order to employ refugees in Uganda?
- **4.** How can collaboration and partnerships between stakeholders be improved to create a more enabling environment for refugee employment in Uganda?

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 promote and socio-economic integration communities. The views expressed herein do not necessarily represent those of the Mastercard Foundation, its staff, or its Board of Directors.

^{9.} Ginn, Thomas, Reva Resstack, Helen Dempster, Emily Arnold-Fernández, Sarah Miller, Martha Guerrero Ble, and Bahati Kanyamanza. "Global Refugee Work Rights Report." Center for Global Development, 2022. https://www.cgdev.org/sites/default/files/2022-global-refugee-work-rights-report.pdf

^{10.} UNHCR, "Uganda Employment Policy Brief." July 2021. https://www.unhcr.org/sites/default/files/legacy-pdf/61371d364.pdf

^{11-12.} Ibid
13. The World Bank, "Uganda's Progressive Approach to Refugee Management." 31 August 2016.

https://www.worldbank.org/en/topic/fragilityconflictviolence/brief/ugandas-progressive-approach-refugee-management

^{14.} UNHCR Operational Portal, "Owned Spaces and Shared Places: Refugee Access to Livelihoods and Housing, Land, and Property in Uganda." 30th September 2019. https://data.unhcr.org/en/documents/details/71764

^{15.} The World Bank, "Uganda's Progressive Approach to Refugee Management." 31 August 2016.

https://www.worldbank.org/en/topic/fragilityconflictviolence/brief/ugandas-progressive-approach-refugee-management



Research Methods

This Uganda report is part of a 15-country study on hiring refugees, conducted by the Refugee-Led Research Hub, on behalf of the Amahoro Coalition. Data was collected both remotely and in-person in May 2024.

Data collection focused primarily on Kampala (in-person), where there is more potential for refugees to access formal employment. The team also conducted remote interviews with refugees in the Nakivale Settlement to gather the perspectives of refugees in settlements regarding access to the formal sector. Overall, the team conducted twenty one (21) interviews with refugees and stakeholders in Uganda, including:

- Two (2) Government officials from the Office of the Prime Minister (OPM);
- One (1) expert on refugees welfare in Uganda;
- Ten (10) refugees (3 in Nakivale Settlement and 7 in Kampala), out of which, four (4) worked in the formal sector, and six (6) worked in the informal sector;
- Two (2) Private Sector companies which have employed refugees;
- Six (6) non-governmental organisations that advocate for and also employ refugees.

We acknowledge that due to the limited scope and budget of the study, the sampling strategy is neither systematic nor representative of the refugee population in Uganda, and the range of refugee experiences in urban and settlement settings. To reduce bias, we triangulate the data with the literature as much as possible, and with the perspectives of team members and affiliates in Uganda. Still, this report does not provide a complete picture of refugee employment in Uganda, but is intended to be useful as a basis for discussion and advocacy.

1. Policies and Legal Frameworks That Govern Refugees' Access to Employment



Overview of Policies and Legal Frameworks in Uganda

The key legal framework managing refugees in Uganda is the Refugee Act of 2006. The 2010 Refugee Regulations lays down the guideline for the implementation of the 2006 Act. Uganda is signatory to the 1951 UN Convention Relating to the Status of Refugees and its 1967 Protocol, the International Covenant on Economic, Social and Cultural Rights (ICESCR), the Organization of African Unity Convention Governing the Specific Aspects of Refugee Problems in Africa and the Bangkok Principles on the Status and Treatment of Refugees.

Uganda is widely regarded as having one of the most progressive legal and regulatory frameworks for refugees worldwide.¹⁹ Refugees are able to move freely, earn an income, and contribute to the local economy by paying taxes.

 Section 30 and 31 of the 2006 Refugee Act allows refugees the freedom of movement and recognised refugees who wish to travel outside the country are entitled to the convention travel document (CTD).²⁰ Refugees can choose where they settle within the country.

- Section 29(e) sub-section (iv), (v), (vi), of the Act allows refugees to access employment opportunities and to engage in gainful employment. 21
- Section 29(e) of the Act allows refugees to engage in income-generating activities, start businesses, and access financial services, such as microfinance, to support their entrepreneurial activities.

However, access to work permits is not clearly covered in regulations. There is no mention of refugee work-permit requirements and subsequent application procedures in the Refugee Act, the 2010 Refugee Regulations and the Uganda Citizenship and Immigration Control Act (UCICA) 2015. Article 54 (1) of the UCICA 2015 establishes the work permits requirements, designated as "Entry Permits^{"23} and the Ministry of Internal Affairs (MIA) has delineated the various categories of the Entry Permits for foreign nationals.²⁴ While refugees are not currently designated any specific category of entry permit, the MIA website makes it clear that refugees are required to apply for a work permit.²⁵ Individuals who do not have full refugee status are ineligible for work permits.²⁶

https://www.refworld.org/legal/decreees/natlegbod/2010/en/102127

https://www.cgdev.org/sites/default/files/2022-global-refugee-work-rights-report.pdf

^{16.} Uganda: The Refugee Act 2006, Act 21, 24 May 2006, https://www.refworld.org/legal/legislation/natlegbod/2006/en/102125 17. Uganda: "The Refugees Regulations, 2010, S.I. 2010 No. 9," 27 October 2010,

^{18.} Michael Addaney, "A Step Forward in the Protection of Urban Refugees: The Legal Protection of the Rights of Urban Refugees in Uganda," African Human Rights Law Journal 17, no. 1 (2017): 218–43, https://doi.org/10.17159/1996-2096/2017/v17n1a10; Ginn, Thomas, Reva Resstack, Helen Dempster, Emily Arnold-Fernández, Sarah Miller, Martha Guerrero Ble, and Bahati Kanyamanza. "Global Refugee Work Rights Report." Center for Global Development, 2022.

^{19.} UNHCR, "Uganda Employment Policy Brief." July 2021. https://www.unhcr.org/sites/default/files/legacy-pdf/61371d364.pdf

^{20.} See: Uganda Refugees Act 2006. https://www.refworld.org/legal/legislation/natlegbod/2006/en/102125

^{21.} Ibid.

^{22.} Ibid.

^{23.} The Uganda Citizenship and Immigration Control Act 2015 (UCICA): https://ulii.org/akn/ug/act/1999/3/eng@2015-03-26

^{24.} Ministry of Internal Affairs, "Entry Permit," https://immigration.go.ug/permit/entry-permit

^{25.} Ibid

^{26.} International Rescue Committee, "Ruled out of work policy brief", 2019



Overview of Policies and Legal Frameworks in Uganda

Section 29(1)(e) of the Act ensures foreign certificates, diplomas, and degrees are recognised by Ugandan authorities. Documents are assessed by the UNEB (Uganda National Examinations Board) and National Council for Higher Education (NCHE).²⁷ According informants, refugees to employers are often not aware that they can go to NCHE for formal verification of foreign diplomas.²⁸

Refugees have the right to open bank accounts and to obtain loans, but may face delays in practice. Under the 2004 Financial Institutions Act and the 2015 Anti-Money Laundering Regulations, refugees in Uganda are allowed to open bank accounts and use mobile money with the Refugee ID card.²⁹ Some refugee respondents said that the process of opening an account can be longer for refugees than for Ugandans, and that banks may deactivate their accounts more quickly if they do not use them regularly (Box 1). Refugees need identification clearance from OPM before banks can process their application to open bank accounts. Banks send their information to OPM then wait for OPM's confirmation. It can take 2 days or a week for OPM to give clearance. A 2022 study by U-learn found that 17% of refugees reported having a bank account, as compared to 15% of host community members, because of "lack of income, prohibitively high fees, low levels of digital and basic literacy and long distances to reach banks."30 As a result, most respondents prefer to be paid via mobile devices, while others are paid in cash.

Box 1. Responses on Access to Bank Accounts

"...of course, many refugees are faced with challenges to open bank accounts or to access loans because of the risk perception of the banks. When the bank assesses and looks at their, you know, financial capacity, their kind of income levels and so on, they do not open bank accounts for them." - Congolese male refugee respondent.

"Despite the fact that you are earning and you have an income, and you have always been paid through the banks, sometimes they make life hard for you in a way. If you've spent some time, for example, without withdrawing money, they block your account. Because they know refugees are mobile and they think, okay you are here working, but after maybe a few years, a few months, you can get resettlement. [...] My account has been closed a number of times. They wait for you to come and appear, and then they say, oh, okay, you are still around? Can you show your updated documents? [...] Then you show them, and they reopen your account."

- Congolese Male refugee respondent

^{27.} ILO, "Review of national policy, legislative and regulatory frameworks and practice in Uganda A baseline study on the right to work and rights at work for refugees." 2023.

https://reliefweb.int/report/uganda/review-national-policy-legislative-and-regulatory-frameworks-and-practice-uganda-baseline-study-rig ht-work-and-rights-work-refugees

^{28.} Uganda Learning Evidence, Accountability and Research Network, "Patterns and Potential of Private Sector Engagement in Strengthening Refugee Livelihoods and Resilience." June 2022.

https://ulearn-uganda.org/wp-content/uploads/2022/06/PSE-report-final_29th-June.pdf

^{29.} UNHCR, "Uganda: Refugee Policy Review Framework update as at 30 June 2023." March 2024:

https://www.refworld.org/reference/countryrep/unhcr/2024/en/147859

^{30.} U-learn Uganda, "Financial Services in the Uganda Refugee Response." January 2022.

https://ulearn-uganda.org/wp-content/uploads/2022/01/Cash-Deep-Dive V8 Final-Feb-22.pdf



Overview of Policies and Legal Frameworks in Uganda

Refugees can save in pension funds. For the few refugees that have accessed formal employment under valid labour contracts, their employers deduct 15% of their gross monthly income paid to the National Social Security Fund (NSSF).³¹ This is a mandatory deduction that refugees can also claim back when they reach retirement age (after 55 years).

Employed refugees pay taxes to the government. In accordance with Section 35(f) of the Refugee Act 2006, any recognized refugee engaged in gainful employment or with any source of income is obliged to pay taxes as stipulated in the Ugandan tax law.³² All respondents who identified as refugees and were employed in the formal sector indicated that their employers withheld income tax prior to disbursing their salaries.

Refugees can access citizenship by naturalisation and registration upon marriage (Box 2). The Refugee Act of 2006 does not explicitly provide for the right to citizenship for refugees in Uganda. However, according to Article 45 of the 2006 Act, the laws on naturalisation, including those set out in the Ugandan Constitution, apply to any recognized refugee in Uganda. 33 Citizenship by registration is another route provided for in Article 14(2) of the Uganda Citizenship and Immigration Control Act 2015 (UCICA).34

All citizenship applications are submitted online through the Directorate of Citizenship and Immigration Control, Citizenship Portal https://www.visas.immigration.go.ug/#/apply.
Applicants submitting an application for citizenship through naturalisation are required to meet the requirements outlined in Applicants submitting an application for citizenship through naturalisation are required to

For refugees married to Ugandan nationals, the financial burden associated with registering for citizenship is a significant obstacle. Anyone wishing to be registered as a citizen through marriage must pay the sum of \$3,000 if their application is approved and they are married to an "indigenous Ugandan citizen,"³⁶ or \$5,000 if they are married to a "registered Ugandan citizen,"³⁷ (someone who obtained Ugandan citizenship through an application process), according to the rules set by the MIA.

Although there are legal provisions allowing refugees access to citizenship, there is currently no available evidence of the number of refugees being naturalised or registered as citizens in Uganda, or if any refugee has successfully obtained citizenship.

³¹ U-learn Uganda, "Financial Services in the Uganda Refugee Response." January 2022. https://ulearn-uganda.org/wp-content/uploads/2022/01/Cash-Deep-Dive_V8_Final-Feb-22.pdf

³² UNHCR, "Uganda Country Summary as at 30 June 2023," March 2024,

https://reliefweb.int/report/uganda/uganda-refugee-policy-review-framework-country-summary-30-june-2023 -

³³ Uganda: The Refugee Act 2006, Act 21, 24 May 2006, https://www.refworld.org/legal/legislation/natlegbod/2006/en/102125

³⁴ Uganda: The Refugee Act 2006, Act 21, 24 May 2006, https://www.refworld.org/legal/legislation/natlegbod/2006/en/102125
35. Ministry of Internal Affairs: "Citizenship by Registration - Due to Marriage." https://immigration.go.ug/citizenship/marriage

^{36.} Ibid.



Overview of Policies and Legal Frameworks in Ethiopia

Box 2. Articles Alluding to Refugee Access to Citizenship

Article 16(5) of the Uganda Citizenship and Immigration Control Act (UCICA) 2015 sets out the criteria that a person must meet to be considered for naturalisation.³⁸ For consideration under this article, he/she:

- A. "has resided in Uganda for an aggregate period of twenty years;
- **B.** has resided in Uganda throughout the period of twenty-four months immediately preceding the date of application;
- C. has adequate knowledge of a prescribed vernacular language or of the English language;
- **D.** is of a good character; and
- **E.** intends, if naturalised, to continue to reside permanently in Uganda."³⁹

Article 14(2) of the Uganda Citizenship and Immigration Control Act 2015 (UCICA)⁴⁰ sets out the standard requirement for applying for citizenship by registration as follows:

- **A.** "every person married to a Ugandan citizen, upon proof of a legal and subsisting marriage of five years or more;
- **B.** every person who has legally and voluntarily migrated to and has been living in Uganda for at least ten years;
- **C.** every person who, on the commencement of the Constitution had lived in Uganda for at least twenty years."⁴¹

Article 15(1) and (2) of the Uganda Citizenship and Immigration Control Act 2015 (UCICA) sets out the procedure to be followed to obtain citizenship by registration.⁴²

- 1. "Any person to whom section 14(1) or (2) applies may apply to the board in writing in the prescribed form, and the board shall, on proof to its satisfaction that section 14 applies to that person, register that person as a citizen.
- 2. The board shall upon registration of any person under subsection (1) issue to that person in the prescribed form a certificate of registration as a citizen of Uganda."⁴³

^{38.} The Uganda Citizenship and Immigration Control Act 2015 (UCICA): https://ulii.org/akn/ug/act/1999/3/eng@2015-03-26

^{39.} Ibid.

^{40.} Ibid.

^{41.} Ibid.

^{42.} Ibid.

^{43.} Ibid.



Changes in Policy

There are signs that efforts may be made in the future to restrict refugee policies in Uganda. The Ugandan Parliamentary Committee on Equal Opportunities has recently advocated for a review of the refugee policy to decrease the number of refugees entering the country. The Committee cited pressure on social services and reduced donor funding as reasons for this recommendation.44 However, it is unclear what cause of action will follow because the first report submitted to parliament was rejected.⁴⁵ Informants suggested that this is still in the consultation stage.

On the other side, and more promisingly, the government is in the process of developing the National Development Plan (NDP) IV, which will integrate the needs of refugees into national development policies.



Photo by illustrate Digital Ug

2. Processes to Obtain Work Permits



Conventional Travel Document

There is no available source online describing the step by step procedure for refugees applying for the work permit by government offices and the procedure is not described in existing policies. The process is described as complex and unclear by most respondents and sources. 46

In order to obtain a work permit, refugees are required to first obtain a Convention Travel Document (CTD).⁴⁷ Once the refugees receive the CTD, an immigration officer can stamp it with the work permit.⁴⁸ This service is facilitated by the Uganda Registration Bureau in collaboration with the Immigration Office for refugees with full status.⁴⁹

Picture 1. Conventional travel document⁵⁰



Picture 2. Conventional travel document⁵¹



There are several steps to applying for the CTD:

- 1. Settlement-based refugees first need to obtain a letter of introduction from the settlement commandant, who will provide a form to fill in personal information and data. Urban refugees can make their request directly to MIA in Kampala (passport office at the MIA) where they can also fill out the CTD request form.
- 2. Refugees need to provide a request letter detailing the reasons as to why they need a CTD. Refugees who have support letters do not need the request letter and are required to attach invitation letters from sponsors (e.g. employers, schools, NGOs).
- 3. Refugees should submit their Refugee ID (Picture 3), a Family Attestation (Picture 4) and pay UGX 220,000 (about USD 60) through deposit to a provided bank account, and submit the photocopy receipt to the application form.
- **4.** After review, OPM forwards the refugee application to the MIA. Applicants outside settlements, can provide their documents directly to the MIA.
- 5. Refugees in the settlement are then contacted by telephone to travel to Kampala to register with MIA and be fingerprinted. For those in Kampala, MIA will call the applicant to arrange an appointment for fingerprinting.
- **6.** Refugees receive a message when the CTD is ready for collection from OPM in Kampala.

^{46.} Izza Leghtas , David Kitenge Refugee international, "Global Lessons for Kenya to Improve Refugees' Access to Work Permits", May 2023. https://www.refugeesinternational.org/perspectives-and-commentaries/global-lessons-for-kenya-to-improve-refugees-access-to-work-permits/

^{47.} Ministry of Internal Affairs, "Convention Travel Document (CTD)." www.immigration.go.ug/services/conventional-travel-documents
48. International Rescue Committee, "Ruled out of work policy brief", 2019
https://www.rescue.org/sites/default/files/document/4312/ruledoutofworkpolicybriefv3.pdf

^{49.} Izza Leghtas, David Kitenge Refugee international, "Global Lessons for Kenya to Improve Refugees' Access to Work Permits", May 2023. https://www.refugeesinternational.org/perspectives-and-commentaries/global-lessons-for-kenya-to-improve-refugees-access-to-work-permits/

^{50.} Photo by the New Vision: 07 March 2017. https://x.com/newvisionwire/status/839087929272205312

^{51.} Photo by Signpost Uganda: March 2024.

https://signpost-uganda.zendesk.com/hc/en-us/articles/17942774330013-How-to-obtain-a-refugee-travel-document



Conventional Travel Document

The CTD is valid for five years. For renewal, refugees follow the same process, but submit the old CTD along with other required documents.

After submission of documents, there can be significant delays to obtaining a CTD. According to most of the respondents, the processing period for the CTD is heavily dependent on the urgency and support given by the UNHCR. Refugees interviewed reported that it can take weeks, months, and in some cases, up to a year.

Box 3. Required documents for a CTD

To apply for a CTD, refugees must gather the following documents:

- Refugee ID and Family Attestation Refugees do not report challenges
 associated with obtaining the Refugee
 ID and the Family Attestation. Once they
 are granted refugee status, refugees
 receive the Family Attestation and
 Refugee ID from OPM.⁵² According to
 the UNHCR, 85% of refugees of 16
 years and above have refugee IDs.⁵³
- Duly filled application form from OPM or MIA (<u>Annex 2</u>)
- Letter of invitation or scholarships or request letter from the applicant
- Letter of introduction from OPM for those residing in refugee settlements.

Picture 3. Refugee ID⁵⁴



Picture 4. Family Attestation⁵⁵



https://reliefweb.int/report/uganda/uganda-refugee-policy-review-framework-country-summary-30-june-2023

54. Photo by Daily Monitor-Uganda: 14 October 2019.

https://www.monitor.co.ug/uganda/news/national/sim-card-scam-opm-protests-ban-on-refugee-ids-1853306 55. Photo by UNHCR:

https://afrid.org/wp-content/uploads/2023/03/Compressed-UNHCR-Registration-of-FDPs-NRSN-Community-of-Practice.pdf

^{52.} Norwegian Refugee Council, "Refugee Status Determination: A Study of the Process in Uganda," October 2022: https://cenfri.org/wp-content/uploads/UPDATED_dentity-verification-for-refugees-in-Uganda-note_Oct-2022.pdf
53. UNHCR, "Uganda Country Summary as at 30 June 2023," March 2024,



Conventional Travel Document

In practice, it is difficult to justify obtaining the Convention Travel Document (CTD) as a work permit requirement, as it was originally designed to facilitate international travel outside Uganda. Refugees who wish to seek formal employment in Uganda and have no reason to travel outside Uganda have little chance of obtaining a CTD (Box 4).

There is no formal process to obtain the work permit stamp. After obtaining the CTD, refugees are supposed to get a stamp for the work permit from an Immigration Officer at the Directorate of Citizenship and Immigration Control (DCIC) at the MIA, free of charge. The process and required documents are not available in any sources, and the rights remain ambiguous. While the MIA's online portfolio provides clear and comprehensive information on the procedures and requirements for various categories of work permits, it lacks specific details regarding the refugee work permit. In its latest country summary, the UNHCR says that "the work permit issued is not linked to a specific employment and does not appear to have an expiration validity" and points out that there is no clear period of validity, "between 1 to 3 years as per Immigration and indefinite according to refugee lawyers."57 There is no existing evidence that refugees have obtained a work permit stamp on their passport: according to the UNHCR, "no data is available on the number of refugees formally engaged in gainful employment [sic] and no data is available on the number of work permits issued to refugees by DCIC for the reporting period."58

Box 4. Challenges in work permit applications

"Now the downside is that to access the work permit, you need to have a conventional travel document [...] You need to have indications of travel because it's basically a refugee passport and it is not free or it is not benefiting from any waived costs." – Key informant.

In addition, none of the informants and refugees interviewed had tried applying for work permits, even those who worked in the formal sector.

The cost of obtaining a CTD is another challenge for refugees. Although the work permit is issued free of charge, the application process requires financial resources that the majority of refugees may not be able to afford. The CTD alone costs about USD 60, and settlement-based refugees must also cover the cost of transportation to Kampala for fingerprinting.

The lack of clear written regulations create confusion among refugee applicants and potential employers. While the 2006 Act provides for refugees access to employment opportunities and operation of income generating activities within Uganda, refugees face significant challenges in accessing formal employment due to the complex and ambiguous interpretation of the 2006 Act and the Uganda Citizenship and Immigration Act 2015, and the gaps in procedures and document requirements for work permit applications for refugees.

^{56.} Ginn, Thomas, Reva Resstack, Helen Dempster, Emily Arnold-Fernández, Sarah Miller, Martha Guerrero Ble, and Bahati Kanyamanza. "Global Refugee Work Rights Report." Center for Global Development, 2022.

https://www.cgdev.org/sites/default/files/2022-global-refugee-work-rights-report.pdf

^{57.} UNHCR, "Uganda Country Summary as at 30 June 2023," March 2024,

https://reliefweb.int/report/uganda/uganda-refugee-policy-review-framework-country-summary-30-june-2023 58. lbid.



Business Licences

Respondents indicated that the procedure for obtaining a designated trading licence by the Kampala Capital City Authority (KCCA) is straightforward and uncomplicated. Business registration can be submitted online on the Uganda Registration Services Bureau (URSB) website⁵⁹ or in-person at the URSB office. Business registration outside Kampala is done at the District Chief Administrative Officers' office.

- 1. Refugees should submit their documents (Box 5) on the URSB online platform (by themselves or with help from an agent of the URSB office). At this stage, refugees pay UGX 35,000 (10 USD) to reserve the company name. Once the documents are approved, refugees receive a certificate of incorporation from URSB.
- 2. To obtain a Tax Identification Number from Uganda Revenue Authority (URA), refugees can apply online and get their TIN from the URA portal or go to URA offices where it is processed the same day.
- 3. After getting approvals and certificate of incorporation at URSB, the applicant then goes to Kampala Capital City Authority (KCCA) offices in the division of residence and submit their certificate of incorporation, the Tax Identification Number from URA, and their business location. After an assessment has been conducted by local authorities, refugees need to make a payment to the KCCA bank account. The business licence is processed in a day or two.

The licence expires after 1 year and must be renewed at the same office. The business licence rates vary depending on the business size and area where the business is located. The businesses are assigned different grades by KCCA [Grade (I) to Grade (IV)]. The licence rates provided by the KCCA range from UGX 6,000 (less than USD 2) – for those operating a small kiosk to UGX 2,625,000 (about USD 700) – for businesses involved in power distribution.⁶⁰

There may be some hidden costs to applying for a business licence. Due to language barriers, respondents mentioned that some refugees end up hiring someone to do these processes for them for a fee. As one refugee business woman explained, "...we also feel that sometimes they charge us for who we are and not for the businesses we are registering." According to some refugee interviewees, refugees are sometimes asked for more money when local authorities are sent to carry out assessments at their business premises. The process can take a long time if refugees do not provide the additional amount.

Box 5. Documents needed/required for Business Licence

For business licence application, refugees need to provide the following documents:

- The Refugee ID or Family Attestation
- The URA tax identification number
- Duly filled form–Article and Memorandum of Association (Annex 3)
- Duly filled form 18 (Annex 3)
- Duly filled form 20 (Annex 3)



Challenges Faced By Refugees

From a procedural point of view, refugees are in practice unable to obtain work permit stamps, limiting their ability to enter the formal sector.⁶¹ Article 59 (1) and (2) of the UCICA forbids foreigners from working without work permits and those who do could face fines up to UGX 150,000 (USD 40) or imprisonment not exceeding two years.⁶² The team found no evidence of refugees reporting arrest or problems with the authorities due to lack of work permits. The lack of a work permit is instead often a barrier for employment.

There is mixed evidence about employers requiring work permits. As there is no provision for work permits for refugees in either the 2006 Refugee Act or the 2010 Regulation, employers, particularly in areas with a significant refugee population, do not require refugees to have work permits. However, some respondents from refugee communities indicated that some potential employers require them to have a work permit before they can be offered a contract.

The scarcity of employment opportunities in Uganda presents a significant challenge for refugees seeking to access work. Competition for jobs, and limited opportunities in urban areas prevents refugees from accessing employment. Within the settlements, the private sector often lacks dynamism, leading to a scarcity of employment opportunities for refugees (Box 6).

Box 6. A competitive job market

"It is not that because I am a refugee, generally it is not easy even for Ugandans themselves. There are no opportunities for people to apply for jobs. There are a lot of workers, but the vacancies are few. So, you need to know someone. If you don't know someone, your chances are minimal."

– South Sudanese Female Refugee
Respondent

Refugees also face structural barriers that do not make them competitive in the formal job market. Many refugees have long periods of inactivity due to their displacement, and have missed out on educational opportunities, and may experience language barriers. Recent arrivals often lack the necessary connections to identify formal employment opportunities or even to obtain basic information about the local labour market. Refugees who are long-term residents of settlements face similar barriers, as they may not be well-connected to the host community, and to potential employers. 65

Only a small number of refugees in Uganda advance into higher education, generally through scholarships provided by the UNHCR and its partners. For instance, Windle International Uganda (WIU) through UNHCR's (Albert Einstein German Academic Refugee Initiative) DAFI has established partnerships with Uganda's universities to provide scholarships.⁶⁶

^{61.} UNHCR, "Uganda Country Summary as at 30 June 2023," March 2024,

https://reliefweb.int/report/uganda/uganda-refugee-policy-review-framework-country-summary-30-june-2023

^{62.} The Uganda Citizenship and Immigration Control Act 2015 (UCICA): https://ulii.org/akn/ug/act/1999/3/eng@2015-03-26

^{63.} UNHCR, "Uganda Employment Policy Brief: Using Socio-Economic Evidence to Promote Solutions for Refugees in Uganda", July 2021. https://www.unhcr.org/sites/default/files/legacy-pdf/61371d364.pdf
64-65. Ibid.

^{66.} Nkiko, C.M., Ahimbisibwe, F. Employment as a Strategic Pathway for Refugee and Host Youth Integration in Uganda. Int. Migration & Integration (2025). https://doi.org/10.1007/s12134-025-01250-4



Challenges Faced By Refugees

Refugee graduates are in a better position than other refugees to find work in the private or nonprofit sector, such as microfinance institutions and humanitarian organisations.

Refugees may also face discrimination when applying for jobs, or after they've been hired.

Some employers may require refugees to provide additional documents, such as a letter of introduction from a local authority to assess whether the refugee is trustworthy, ⁶⁷ even when this is not required by law. Private sector companies may deny opportunities to refugees because of negative perceptions towards them (Box 7). ⁶⁸

capital for Limited access to refugee entrepreneurs is a challenge. Certain banks decline to provide loans to refugees, citing the mobility nature of refugees, despite the fact that all necessary requirements. 69 they fulfil Refugees may also not have collateral such as land titles, big business assets or vehicles, which makes it difficult for them to access loans from banks to set up or boost their income generating activities (Box 8). However, Micro-Finance Institutions (MFIs) such as UGAFODE Microfinance Limited, Vision Fund Uganda, Rural Finance Initiative (RUFI), FINCA Patapia, **BRAC** Uganda, Opportunity Bank, have recently been extending formal financial services to refugees in 6 urban and 11 rural branches across Uganda and are giving loans to refugees.70

Box 7. Discriminatory practices

"That is an issue like why are you giving a refugee a job when there are Ugandans that don't have jobs? Even the people that are hiring might be forced not to get a refugee because they might get retaliations from nationals whose people have not been employed or who might have not been employed themselves." – South Sudanese Female Refugee Respondent

Box 8. Accessing loans

"Refugees don't have collateral. And, is the hindrance for accessing capital. Financial institutions, of course, because they're after business, they do not consider the specific, context and circumstances of refugees."

– Congolese Male Refugee Respondent

"The first company that I saw was UGAFODE... They were providing loans to a group of refugee women...To get a bank loan you need some security like land title, car log books and a lot of refugee women don't have. So, for them they had a program where they were giving 10 groups of people without the security requirement." – South Sudanese Female Respondent

^{67.} Francesco Loiacono and Mariajose Silva Vargas, "Improving Access To Labour Markets for Refugees: Evidence from Uganda." 2019. https://www.theigc.org/sites/default/files/2019/10/Loiacono-and-Vargas-2019-final-paper_revision.pdf

^{68.} JICA & Refugee Investment Network. "Data Collection Survey on Refugee-Related Business and Social Investment", January 2022. https://openiicareport.iica.go.jp/pdf/1000047520.pdf

^{69.} UNHCR, "Uganda: Refugee Policy Review Framework update as at 30 June 2023." March 2024: https://www.refworld.org/reference/countryrep/unhcr/2024/en/147859

^{70.} IRC, "REBUILD Boosting Livelihoods Scaling Local Refugee Lending-Kampala and Nairobi," April 2023, https://www.rescue.org/sites/default/files/2023-06/FSP%20Learnings%20%26%20Insights%20Mav%202023.pdf



Challenges Faced By Refugees

There are also some fintech initiatives to provide access to credit for refugees in Uganda. For instance, the Refugee Investment Network (RIN) collaborated with Tugende Limited, a Ugandan asset finance company that helps informal entrepreneurs own assets that generate income by bridging the credit gap for entrepreneurs and small businesses. This joint initiative is focused on providing financing opportunities to both refugees and local community members, enabling them to start and grow their businesses.⁷¹

The impact of this framework is measured through the 'refugee opportunity index'. "Uganda performed slightly better" on this scale compared to countries like Kenya and Ethiopia.⁷² There are no particular timelines for this project.



Masindi, Western Region, Uganda. Photo by illustrate Digital Ug

^{71.} Refugee Investment Network, "Tugende", June 2022. https://refugeeinvestments.org/opportunities/tugende-limited/
72. Refugee Investment Network, "Refugee Opportunity Index (ROI)." 2022. https://refugeeinvestments.org/resources/refugee-opportunity-index/ -.

3. Challenges Faced by Private Sector Actors to Employ Refugees



Challenges Faced by Private Sector Actors to Employ Refugees

The literature does not focus on the role of the private sector as potential employers of refugees in Uganda, but rather on its role in "financing, policy dialogue, capacity development, technical assistance, integration of business operations."73 Several service providers are targeting refugees as potential clients. To do so, they are piloting projects in refugee settlements to provide access to finance, electricity, and internet to refugees and host communities.74

Private sector companies do hire refugees in Uganda, including banks, hotels, healthcare, schools, and agri-business. Private sector companies interviewed for this study highlighted that they hired refugees because they tend to be hard workers, cost less than Ugandan workers, and possess foreign language skills (Box 9).

Nevertheless, negative perceptions refugees among the private sector persist, and most employers appear reluctant to hire refugees (Box 10). A 2019 study found that some employers believe that refugees are competing with the host community for employment opportunities, even though they should not be allowed to work because they are receiving humanitarian assistance.⁷⁵ Potential employers may also view refugees as temporary residents and see no value in offering them formal contracts in the formal employment sector, as they may return to their countries of origin or be resettled elsewhere at any time.

Box 9. Advantages of hiring refugees

"We get a lot of French guests. So the hotels which actually employed the Congolese French speaking refugees were extremely happy to have people who fluently speak another language, being able to communicate with the guests at their hotel, and sometimes even being able to train the rest of their staff in the hotel in a foreign language, because for us, in tourism, really having a foreign language, proficiency is a huge advantage to someone's career."

— Private Sector Respondent in the hospitality business

Box 10. Reluctance to hire refugees

"...I think it is still very much a taboo, because even for us, as the hotels it was, it was a very, very big discussion of over 5 years, you know many people worried about the implication of hiring refugees, many people being discriminatory against the refugees" – Private sector respondent who has hired refugees.

^{73.} Uganda Learning Evidence, Accountability and Research Network, "Patterns and Potential of Private Sector Engagement in Strengthening Refugee Livelihoods and Resilience." June 2022. https://ulearn-uganda.org/wp-content/uploads/2022/06/PSE-report-final_29th-June.pdf

^{74. &}quot;Banks such as Equity Bank, Centenary Bank, and Stanbic Bank have established branches within refugee settlements to provide savings accounts, loans, and financial literacy trainings. Similarly, telecom company Zuku and mobile operators Airtel and MTN have established footprint in the settlements to facilitate access to mobile money, provide internet connectivity, and sell products." See: Learning Evidence, Accountability and Research Network, "Patterns and Potential of Private Sector Engagement in Strengthening Refugee Livelihoods and Resilience." June 2022. https://ulearn-uganda.org/wp-content/uploads/2022/06/PSE-report-final_29th-June.pdf
75. Francesco Loiacono and Mariajose Silva Vargas, "Improving Access To Labour Markets for Refugees: Evidence from Uganda." 2019. https://www.theigc.org/sites/default/files/2019/10/Loiacono-and-Vargas-2019-final-paper_revision.pdf



Challenges Faced by Private Sector Actors to Employ Refugees

In several cases, private sector actors have hired refugees as part of an INGO-led pilot, following considerable advocacy and support from refugee support organisations (see section 4). Refugee-owned businesses are more open to hiring other refugees without additional advocacy because of their shared history and challenges.

Lack of awareness of refugee rights is another persisting concern. Firms are still hesitant to hire refugees due to uncertainty about the refugees' legal status, right to work, and freedom of movement. Even when they are aware of refugee rights, employers are also unwilling to employ refugees because of "opaque regulations and the extra burden to comply with them."

The nonprofit sector is another employer of refugees. INGOs, NGOs and RLOs recruit refugees with English language skills and higher levels of education. In many aid agencies, refugees are employed in low-level incentive roles on short-term contracts, with qualified refugees having limited access to senior professional positions (Box 11).⁷⁸

Box 11. Incentive work

"You have no job...you just take up what comes. And I saw myself working with refugees who have bachelor degrees and they were working as interpreters and translators and volunteers." – Congolese Male Refugee Respondent

"[an organisation] which currently employs refugees as incentive workers, as cleaners, as interpreters and nothing else. Even when we have refugees who are qualified in data collection who are qualified as data clerks who are qualified as caseworkers who could actually understand the problems of refugees more than anybody else. But you find they are being treated simply to that lowest level." – Congolese Male Refugee Respondent.

^{76.} UNHCR, "Uganda Employment Policy Brief: Using Socio-Economic Evidence to Promote Solutions for Refugees in Uganda", July 2021. https://www.unhcr.org/sites/default/files/legacy-pdf/61371d364.pdf

^{77.} Uganda Learning Evidence, Accountability and Research Network, "Patterns and Potential of Private Sector Engagement in Strengthening Refugee Livelihoods and Resilience." June 2022.

https://ulearn-uganda.org/wp-content/uploads/2022/06/PSE-report-final_29th-June.pdf

4. Collaborations and partnerships in Uganda



High-Level Collaborations

While there have been notable efforts between the government and conventional humanitarian organisations such as IRC and UNHCR, these efforts are primarily through the lens of humanitarian protection, resilience building, and livelihoods. The prevailing perspective on refugee employment is one that emphasises socio-economic empowerment, entrepreneurship, and subsistence farming. As the majority of refugees seek to establish themselves as entrepreneurs due to a scarcity formal employment opportunities, agencies, RLOs, and private sector actors provide training, awareness and sensitisation to refugees on how to open bank accounts, access loans from banks and microfinance institutions and on how to run small income generating activities. RLOs, INGOs and other actors also support refugees through a variety of programs, providing information, connecting refugees with training for online jobs, vocational entrepreneurship and business startups.

Many large-scale projects in Uganda aim at improving refugees' access to livelihood, but results and lessons are not yet made public (see Annex 4).

Some refugees feel that existing training programmes - because of their short length - do not equip them with meaningful skills and do not set them up for success in the formal job market. As one male refugee respondent said: "...you know, these short courses, they call them skills building and all that, it is recreational, it's not developmental and does not really lead to much significant changes in people's lives."

Initiatives that include direct engagement with private sector, job matching apprenticeships are promising as they can both create jobs for refugees and break down barriers created by discrimination for employers. For instance, the ILO apprenticeship program initiative⁷⁸ in partnership with the Uganda Hotel Owners Association (UHOA), and the Ministry of Gender, Labor and Social Development (MGLSD), Uganda Hotel and Tourism Training (UHTTI). have been workplace training for refugees in the hospitality industry. This initiative has been piloting an apprenticeship program with the objective of hiring and creating opportunities for refugees and the host community hospitality and tourism sector within Kampala. The UHTI runs the training program for one year- spaced in three terms from January to December. The training focuses on occupations in food production, front office, food and beverages services, housekeeping. The laundry programme benefitted 71 refugees, 24 members of the host community and 2 persons living with disabilities who are now placed in the hotel industry.80



High-Level Collaborations

(ILO) is currently engaged in collaborative initiative with AVSI Foundation, known as the Rural Employment Services Project. This project is being implemented in four focal districts: Isingiro, Arua, Terego, and Madi-Okollo. The objective of this initiative is to facilitate access to employment and career counselling services for refugees, with the aim of preparing them for gainful employment.81 In light of the surplus of skills in the informal sector among job seekers, evidenced by the ILO's 2020 rapid evaluations, the project aims to reduce unemployment bv providing customised employment services to host and refugee community workers within the informal sector.82

Despite initiatives and numerous investments, sources say that results are limited by a lack of strategy and duplication. Uganda has developed the Jobs Livelihoods Integrated Response Plan (JLIRP) for Refugees and Host Communities in Uganda to be implemented across five-years in the period 2020 to 2025. The Plan, developed by the Government of Uganda with support of the United **Nations** Development Programme (UNDP) and sectoral partners, is meant to benefit over 1.4 million refugees and 5.7 million Ugandan citizens in 31 settlements in 13 districts (with a budget of about USD 169 million).83 However, reports suggest that the "Jobs and Livelihoods Response Plan under the latest policy framework is yet to generate excitement within the donor and private communities."84

^{81.} ILO, "Review of national policy, legislative and regulatory frameworks and practice in Uganda A baseline study on the right to work and rights at work for refugees," 2023

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@ddq_p/documents/publication/wcms_866792.pdf

^{82.} AVSI, "Tender Notification Code No: Avsi-Uga-Kam05324/Supply of Equipment for Rural Employment Services Project-IIo3 Prj -July 2024 -001." https://back.avsi.org/uploads/1.-Tender-Notification.pdf

^{83.} UNDP, "Govt, UNDP Launch Jobs and Livelihoods Plan for Refugees, Host Communities", May 2021.

Govt, UNDP Launch Jobs and Livelihoods Plan for Refugees, Host Communities | United Nations Development Programme

^{84.} JICA & Refugee Investment Network. "Data Collection Survey on Refugee-Related Business and Social Investment", January 2022. https://openiicareport.iica.go.jp/pdf/1000047520.pdf

5. Recommendations



Conclusion

Uganda is widely commended for its progressive refugee policy. However, the implementation of the policy on access to formal employment is not having the desired impact due to policy and procedural gaps. In addition, obtaining a work permit is not a priority for many refugees as they work mainly in RLOs, the informal sector and in incentive jobs/roles where a work permit is not required. This highlights the limited scope of employment opportunities available to refugees.

Collaboration and partnerships to improve livelihoods and employment opportunities for refugees are mainly driven by traditional humanitarian actors such as the International Rescue Committee (IRC), UNHCR and other NGOs. Despite their significant efforts, there is a notable lack of meaningful private sector involvement in these initiatives. Private sector involvement in refugee employment remains minimal and uncoordinated. This fragmented approach hinders the development of comprehensive and sustainable solutions.



Imvepi refugee settlement in Arua district, located in northwestern Uganda. Photo by @EU/ECHO/Edward Echwalu



Recommendations for Uganda

- 1 The Government should review and provide clear policy interpretation on work permit requirements for refugees. Despite the 2006 Refugee guaranteeing refugees the right to work, the Immigration Department maintains that refugees require a work permit to access employment. Consequently, potential employers find it challenging to recruit refugees due to this ambiguity in laws. The government should not cluster refugees with other foreign nationals, as this further hinders refugees' access to formal employment. This situation forces many refugees to seek employment opportunities in the informal sector or engage in incentive work. Clear and well-defined policy guidelines can foster a sense of assurance and security among both refugees and prospective employers regarding the legal right of refugees to pursue formal employment opportunities within Uganda.
- Donors and INGOs should scale up apprenticeship programmes, and provide tangible incentives to the private sector to recruit refugees. refugees can be framed as a mutually beneficial endeavour that can bring diverse skills and perspectives to the workforce, good experiences will increase employers' interest in hiring refugees. Incentivising companies through financial support can lower the barriers to hiring refugees. For example, donors stakeholders could create a fund or scheme that pays 3-6 months of a refugee's salary, allowing them to gain on-the-job skills and experience while minimising financial risks for employers.

- This could be part of a placement programme led by universities vocational training centres Uganda match students with private sector companies. In this way, the private sector can be encouraged to see the value in hiring refugees, making it a low-risk, high-reward proposition.
- Donors, UNHCR and partners should increase support for higher education for refugees. To make refugees more competitive in the labour market, access to local and global universities should be increased. While vocational training is valuable, higher education provides refugees with the skills needed to compete for a wider range of job opportunities. To increase access to education in Uganda, donors should consider supporting the establishment and expansion of online and blended degree programmes, such as those offered by Kepler University and Southern New Hampshire University's (SNHU) Global Education Movement (GEM) in Rwanda.85 Another added value of these programmes is that they can play a role in connecting refugee students with potential employers. On the student side, refugees can be coached on application processes and interview skills. On the employer side, memoranda of understanding can be developed with potential employers to recruit refugee graduates.

85. See: https://kepler.org/refugee-education/



Recommendations for Uganda

- INGOs should move beyond incentive opportunities and employ refugees as professionals. Incentive-based remains a prevalent practice, particularly in countries where refugees are prohibited from engaging in the formal employment sector. While Uganda has been lauded for having a progressive refugee policy that allows refugees access to gainful employment, only a few humanitarian working organisations with communities like the IRC are recruiting refugees into professional roles. There should be a push to formalise refugee employment, ensuring fair wages and career development opportunities. International donors can support this shift by prioritising funding to organisations that facilitate the transition from incentive work formal employment, ensuring that refugees have access to fair and sustainable employment.
- 5. **Stakeholders** should systematically share lessons learned from private sector engagement and projects aimed improving refugees' access to the labour market. The limited information available on programme evaluation, progress and outcomes makes it difficult to inform future decision-making and is a key gap to be addressed in the Ugandan context. Organisations should systematically capture and publicly disseminate lessons learned as a result of projects. They could also share interim updates for longer-term projects whose results will take longer to materialise.

Annexes



Citizenship application requirements

Applicants submitting applications for citizenship through naturalisation are required to meet the following requirements outlined in Box 12.86

Box 12. Requirements for citizenship through Naturalisation (Form D)87

- **A.** "Recommendation letter and National Identity cards of 2 referees (Ugandan by birth of substantial standing)
- B. Valid Certificate Good Conduct from Interpol (issued within last 6 months)
- C. Current passport (if any)
- D. Recent Passport size photograph
- E. Medical report of sanity from a certified Doctor
- F. Notarized Oath of Allegiance (download and re-attach duly signed)
- **G.** Covering/application letter from the Applicant (addressed to Secretary National Citizenship and Immigration Board)
- H. Download and complete Form D (re-attach Duly signed)
- I. Recommendation letter from LC1, RDC/ DISO
- **J.** Evidence that the applicant has resided in Uganda for a period of Uganda for 20 years (e.g. birth certificate, academic documents, Graduated tax tickets, baptism cards, land title/purchase agreements)
- K. Proof of continuous stay of 24 months in the country before applying (affidavit)
- L. Proof of profession/occupation
- M. Application fee UGX100,000 [about 27 USD]."



Citizenship application requirements

Applicants submitting applications for citizenship due to marriage are required to meet the following requirements outlined in Box 13.88

Box 13. Requirements for citizenship by registration through Marriage⁸⁹ (Form C)⁹⁰

- **A.** "Recommendation letter and National Identity card of 2 referees (Ugandan by birth of substantial standing)
- B. Valid Certificate Good Conduct from Interpol (issued within last 6 months)
- C. Current Passport Bio Data Page
- D. Recent Passport size photograph
- E. Medical report of sanity from a certified Doctor
- F. Notarized oath of allegiance (download and re-attach duly signed)
- G. Recommendation letter from LC1, RDC and DISO (from area of residence)
- **H.** Evidence of marriage certified copy of marriage certificate by URSB (If marriage is contracted outside Uganda should be certified by home country/Embassy)
- I. Support/consent letter from Spouse
- **J.** Evidence of Spouse Being Ugandan (copy of passport, national ld (for registered spouses attach registration certificate)
- **K.** Evidence of five years' continuous legal stay in Uganda (copy of entry permit/CR/DP-Spouse)
- L. Proof of profession/occupation
- M. Download and complete Form C (re-attach Duly signed)
- N. Application fee USD 500."



CTD application form





OFFICE OF THE PRIME MINISTER

PLOT 9-11 APOLLO KAGGWA ROAD. P.O. BOX 341, KAMPALA, UGANDA TELEPHONES: General Line 0417 770500, Web: www.opm.go.ug, E-mail: ps@opm.go.ug

In any correspondence on this subject, please quote No: OPM/R/41

APPLICATION FOR A CONVENTIONAL TRAVEL DOCUMENT. (PLEASE FILL IN BLOCK LETTERS)-Use YES/NO/NA -Not applicable)

•	 .ро.	٠.	 _

APPLICATION	
Passport Type	
Type of Application	
Priority	
Normal	
Renewal	
Lost	
Place of Submission	
Details of OLD/Lost Conventional Travel	
Document (CTD)	
Place of Issue	
Date of Expiry	
THE APPLICANT	
Personal Details	
Surname	
Given Name	
Maiden Name	
Other Names	
Telephone Number	
Sex	
Date of Birth	
Marital Status	
Place of Birth	
Profession/Occupation	
Refugee ID No. (Individual ID)	
Email Address	
RESIDENTIAL ADDRESS	

OPM Vision: A Public Sector that is responsive and accountable in steering Uganda towards rapid economic growth and development,



CTD application form

Country of Residence	
District	
County/Municipality Sub-County	
Parish/Ward	
Village LC.1/Zone Plot Number	
If Out of Uganda State, Address	
DETAILS OF COUNTRY OF ORIGIN	
Nationality	
SPOUSE	
Spouse Surname	
Spouse Given Name	
Maiden Names	
Date of Marriage	
Place of Marriage	
PARENTS DETAILS	
Father's Details	
Father Status	
Father Surname	
Father Given Name	
Country of Birth	
Place of Birth	
Country of Residence	
District	
County/Municipality	
Sub-County	
Parish/Ward	
Plot Number	
Father's Tribe	
Nationality	
MOTHER'S DETAILS	<u> </u>
Mother Status	
Mother Surname	
Mother Given Name	
Mother Maiden Name	
County of Birth	
Place of Birth	
Country of Residence	1
District	+
County/Municipality	+
Sub-County	+
Parish/Ward Plot Number	+
	+
Mother's Tribe	
Nationality	



CTD application form

Contact Given Name Phone Number Email Address District County/Municipality PAYMENT Payment Mode Payment Mode Payment Bank Declaration: I, the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton	NEXT OF KIN	
Phone Number Thail Address District Dounty/Municipality Plot Number Relationship Payment Mode Payment Bank Declaration: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not lost my Refugee status in Uganda 3. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton	Contact Name	
Email Address District County/Municipality Plot Number Relationship PAYMENT Payment Mode Payment Bank Declaration: , the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: - 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton/here attached. 5. That I have made no other applications for CTD since that attached was issued (Delete 3 or 4, whichever is applicable) 6. That I have fully understand the legal Implications of what I have stated above and as such do accept ant legal consequences that may arise out of what I have stated in this form Signature Recommender WE certify that the applicant is a recognized refugee registered with Office of the Prime Minister. Douglas Asiimwe,	Contact Given Name	
District County/Municipality District County/Municipality District District County/Municipality District Distri	Phone Number	
County/Municipality Plot Number Relationship Payment Mode Payment Bank Declaration: , the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare hat: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoSusued aton	mail Address	
Poclarationship Payment Mode Payment Mode Payment Bank Declaration: In the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: In that the information given in this application is correct to the best of my knowledge That I have not lost my Refugee status in Uganda That I have not previously held or applied for a travel document of any description, That all previous travel documents granted to me has been surrendered /CTD No		
Relationship PAYMENT Tayment Mode Payment Bank Declaration: I, the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD No		
Payment Mode ayment Bank Declaration: , the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare nat: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton	lot Number	
Peclaration: In the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued atonExpired on/here attached. 5. That I have made no other applications for CTD since that attached was issued (Delete 3 or 4, whichever is applicable) 6. That I have fully understand the legal Implications of what I have stated above and as such do accept ant legal consequences that may arise out of what I have stated in this form Signature Recommender WE certify that the applicant is a recognized refugee registered with Office of the Prime Minister. Date:	Contract to the contract of th	
Pocclaration: In the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton		
Declaration: In the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare that: 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD No		
the undersigned, hereby apply for the issue of Conventional Travel Document (CTD). I declare hat: - 1. That the information given in this application is correct to the best of my knowledge 2. That I have not lost my Refugee status in Uganda 3. That I have not previously held or applied for a travel document of any description, 4. That all previous travel documents granted to me has been surrendered /CTD NoIssued aton	ayment Bank	
NE certify that the applicant is a recognized refugee registered with Office of the Prime Minister. Date: Douglas Asiimwe,	 4. That all previou NoIssued at. 5. That I have made or 4, whichever is 6. That I have fully such do accept ar form 	is travel documents granted to me has been surrendered /CTIonExpired on/here attached. e no other applications for CTD since that attached was issued (Delete is applicable) understand the legal Implications of what I have stated above and a
Date: Douglas Asiimwe,	20 200 20 20	cant is a recognized refugee registered with Office of the Prime Minister
Douglas Asiimwe,	via certary triat the applic	
		Date:
		_
		CRETARY.
		CRETARY.
	Douglas Asiimwe, FOR: PERMANENT SE	CRETARY.
		CRETARY.



Business licence required documents

For business licence application, refugees need the following documents:

- The refugee ID or family attestation
- Duly filled form–Article and Memorandum of Association (Picture 5)
- The URA tax identification number
- Duly filled form 18 (Picture 6)
- Duly filled form 20 (Picture 7)

Picture 5. Memorandum of Association

THE REPUBLIC OF UGANDA THE COMPANIES ACT NO. 1 OF 2012 MEMORANDUM AND ARTICLES OF ASSOCIATION OF A COMPANY LIMITED BY SHARES MEMORANDUM OF ASSOCIATION OF.....LIMITED. 2. The registered office of the company will be situated in Uganda. 3. The objects for which the company is established are, and of the doing all such other things as are incidental or conducive to the attainment of those objects. 4. The liability of the members is limited. WE, the several persons whose names and addresses are subscribed, desire to be formed into a company, under this memorandum of association and we respectively agree to take the number of shares in the capital of the company set opposite our respective names. Names, postal addresses and Number of shares taken by Signature occupations of subscribers each subscriber subscribers 1. 2. 3. Total shares taken Dated, 20......, Witness to the above signatures ARTICLES OF ASSOCIATION.....LIMITED. Adopt table A Part II of Companies Act 2012 Adopt table A Part II of Companies Act 2012 with modification (Attach the modification1) WE, the several persons whose names and addresses are subscribed, desire to be formed into a company, under this Articles of association. Names, postal addresses and occupations of subscribers Signature of subscribers Dated day of, 20...... Witness to the above signatures

1 Recommended, not more than 2 pages



Business licence required documents

Picture 6. Form 18

Company Form 18

Reg 25

THE REPUBLIC OF UGANDA

THE COMPANIES ACT

NOTICE OF SITUATION OF THE REGISTERED OFFICE AND THE REGISTERED POSTAL ADDRESS OR OF ANY CHANGE THEREIN

REGISTERED POSTAL ADDRESS OR OF ANY CHANGE THEREIN
(Under section 116 of the Act).
Registration Number:
Name of Company:
NOTE- This Notice must be forwarded to the Registrar of Companies within 14 days after the date of the incorporation of the company or of the change, as the case may be.
Presented by:
NOTICE of the situation of the Registered Office of any change therein.
TO: THE REGISTRAR OF COMPANIES:
(insert name of company) hereby gives you notice, in accordance with section 116 of the Companies Act, that the Registered Office of the Company is situated at
and the registered postal address of the company is
as
from theday ofthe year
Signed
(Director/ Secretary)
DATED theday ofthe year



Business licence required documents

Picture 7. Form 20

Company Form 20

Reg 26(2)

NO	TIFICATION O SEC	HE COMP F APPOIN RETARY	C OF UGANDA ANIES ACT TMENT OF DI OF COMPANY 92(4) of the Ac	RECTOR AND	
Registration Nun	nber:				
Name of Compa	ny:				
Presented by:					
TO: THE REGIS	TRAR OF COM	MPANIES.			
TAKE NOTE that been appointed effect from the	as director/ dir	ectors/ sec	cretary of the	above named o	company with
(a) PARTICU	LARS OF DIR	ECTORS -	INDIVIDUALS		
Names (First Name and	Date of Birth	Address	Nationality	Occupation	Other Directorships
surname)					

Name and surname)	Date of Birth	Addioss	Nationality	Оссирация	Directorships
					<i>y</i>
Ż					
					N.
					15



Business licence required documents

Picture 8. Form 20

orporate Name		ed or P	rincipal Office	Postal Address	I .
	register	Cu OI PI	incipal Office	i Valdi Addiesa	
	10				
			1		
					-
	10				-
				RETARY	
PARICULARS O	F INDIVIDUA	AL SEC	CRETARY	RETARY postal address	
PARICULARS O	F INDIVIDUA	AL SEC	CRETARY		
PARICULARS O	F INDIVIDUA	AL SEC	CRETARY		
PARICULARS O	PF INDIVIDUA imame)*	AL SEC	CRETARY		
PARICULARS O	PF INDIVIDUA imame)*	AL SEC	CRETARY		
PARICULARS Of lames (first name and substate any former first and	or individual imame)*	Res	CRETARY sidential and p	postal address	
PARICULARS Of lames (first name and substate any former first and	or individual imame)*	Res	CRETARY sidential and p	postal address	
PARICULARS Of Immes (first name and substate any former first and	or individual imame)*	Res	CRETARY sidential and p	postal address	
PARICULARS Of lames (first name and substate any former first and large and	or individuation imame)* surnames PORATE SEC	Res	CRETARY sidential and p	postal address	
PARICULARS Of lames (first name and substate any former first and large and	or individuation imame)* surnames PORATE SEC	Res	CRETARY sidential and p	postal address	
PARICULARS Of lames (first name and substate any former first and large and	or individuation imame)* surnames PORATE SEC	Res	CRETARY sidential and p	postal address	
PARICULARS Of lames (first name and substate any former first and large and	or individuation imame)* surnames PORATE SEC	Res	CRETARY sidential and p	postal address	Director
PARICULARS Of lames (first name and substate any former first and large and	or individuation imame)* surnames PORATE SEC	Res	RY Registered Of	oostal address ffice	Director
b) PARTICULARS OF PARICULARS OF Iames (first name and su state any former first and PARTICULARS OF COR	or individuation imame)* surnames PORATE SEC	Res	RY Registered Of	oostal address ffice	Director



Large scale projects

Many large-scale projects in Uganda aim at improving refugees' access to livelihood, but results and lessons are not yet made public.

Partnership for improving prospects for forcibly displaced persons and host communities (PROSPECTS, ILO. 2019-2023). The aim of PROSPECTS, as outlined by the ILO, is to "facilitate transitioning from humanitarian development-centred assistance, which can address long-term challenges and needs of the host and refugee communities and accelerate sustainable solutions to build a more inclusive, cohesive and productive society."91 It focuses on education, decent work, protection and new ways of working. As this project focuses on settlement areas, there is little emphasis on refugee employment, but rather refugee-led initiatives and entrepreneurship (e.g., value-chain development support to refugee and host community cassava and sesame cultivators).

Refugees in East Africa: Boosting Urban Innovations for Livelihoods Development (Re:Build) initiative (2021-2026) a 5-year, \$30 million partnership between the International Rescue Committee (IRC) and the Ikea Foundation seeks to foster opportunities for refugees in Kampala and Nairobi.92 RE:BUILD initiative is currently underway and about 20,000 people, refugees and host community members within Kampala and Nairobi should receive job support. The initiative will attempt to create a safe environment for women to also actively participate in the male dominated industries like public transport. Results and lessons have not been shared publicly yet.