



# (Deprived of Access to Services and at Risk)

A Status Report on the Registration Services System Issues at UNHCR  
Egypt



Cairo 30 Jan 2024  
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## **Issues Retaining to the Registration Services System**

According to the latest statistics by the United Nations High Commissioner for Refugees (UNHCR) in Egypt, as of January 2024, a total of 480,000 refugees and asylum seekers of 62 nationalities are registered with the organization. Granting asylum status imposes legal obligations on the host country as a signatory of the International Convention Relating to the Status of Refugees. The UNHCR is the sole entity responsible for providing registration services in Egypt - according to the memorandum of understanding with the Egyptian government and its self-definition on the official website.

Through its work with diverse refugee communities in Egypt, the Refugees Platform in Egypt (RPE) has identified and documented numerous issues associated with the system and policies governing registration services provided by the UNHCR in Egypt. These services, central for regularization or legal recognition of identity, directly contribute to outcomes that heighten the level of and potential risks for asylum seekers and refugees in Egypt. Furthermore, they amplify the challenges and barriers concerning legal protection and specialized protection matters linked to the asylum-seeking process or attainment of refugee status, as well as facilitating access to essential services.

These problems and challenges stem from a bureaucratic system incapable of responding to the variables associated with the circumstances surrounding the movement and lives of refugees and asylum seekers in Egypt. The severity of these issues heightened during and after an 11-month closure of the UNHCR office in Egypt, which disrupted and delayed its services, including registration services for both registered individuals and first-time applicants. This directly led to significant pressure on UNHCR services upon reopening and full operation. Additionally, it resulted in numerous risks and violations affecting refugees and asylum seekers residing in Egypt during the closure period, during which their residency permits expired and many of their cards required renewal. Those in this legal limbo were deprived of all services and exposed to various risks without any legal protection nor a governmental response that considers the exceptional circumstances during the COVID-19 pandemic.

## **Increase in Complaints During the Last Quarter of 2023**

During the last quarter of 2023, the RPE observed and documented an increase in the number of complaints related to challenges and difficulties in accessing and obtaining registration services for both registered individuals and first-time applicants. This includes services such as asylum applications, additional services like birth registration or adding new members to the file/card, and renewing expired registration cards.

The testimonies and complaints documented by the RPE point to several issues concerning the response of the UNHCR system and its Cairo office to registration services and operational procedures. These encompass the difficulties encountered by applicants seeking various registration services in connecting with specialized staff within the office to schedule appointments through the information hotline, which serves as the first step in the registration

process. In some cases, this requires multiple attempts to establish contact and prolonged waiting periods on the hotline.

All the cases encountered by RPE during this assessment reported spending hours attempting to connect or waiting before the hotline disconnected, necessitating multiple calls. In some instances, individuals had to call on different days.

The act of making a call itself becomes a significant challenge for individuals without valid residency permits or whose permits have expired - precisely those who require registration services. This is because SIM cards from different telecommunications companies are only issued to valid residency permit holders. Consequently, when a residency permit expires, the SIM card service is suspended, depriving the individual of both making calls to schedule appointments and accessing internet services.

Due to their inability to reach staff members, some refugees resorted to waiting outside the UNHCR office in the 6th of October City and sleeping on the sidewalks facing the office, hoping to enter and schedule an appointment the following day, as documented by the platform. This resulted in their detention by police officers stationed around the UNHCR office during recent months, as reported in documented cases. Simultaneously, the refugee registration services system was susceptible to exploitation, with [previous testimonies recorded](#) by the platform indicating that some individuals solicited money under the pretense of facilitating internal services for refugees and asylum seekers. This was denied by the UNHCR office in Cairo, urging refugees and asylum seekers to report individuals attempting to impersonate such roles.

According to testimonies documented in the final quarter of 2023 from refugees of different nationalities, in the case of overcoming the challenges of communication, waiting, and reaching a staff member, the appointment dates scheduled are often after a long period ranging between 4 and 6 months. Such prolonged periods present significant hurdles, particularly for asylum seekers who may not possess any identity documents during this period, or those with expired residency permits. Moreover, these initial appointment dates do not conclude the registration process. Individuals often require additional appointments to finalize the registration process and receive their cards, which are necessary for issuing the reference number.

The challenges persist beyond the registration process at UNHCR and the issuance of cards (yellow or blue), as per testimonies, including the application for an appointment to acquire the reference number. This procedure, managed through [Caritas](#), precedes the subsequent step of applying for residency permits at the Passports and Immigration Sector under the Ministry of Interior. Individuals must then await appointments for collection, with the entire process potentially extending an additional 5-6 months.

Individuals are forced to spend approximately a whole year before obtaining valid residency permits, which have a maximum validity period of six months. Subsequently, they are required to begin the renewal process for their residency permits at least two months before the expiration date to avoid reaching the expiration stage without initiating the procedures, thus exposing themselves to risks.

The UNHCR in Egypt operates solely through two offices within Greater Cairo, located in Zamalek and 6th of October City, respectively. Each office specializes in serving specific nationalities, with no offices situated near border areas or border crossings. Consequently, individuals must visit the designated office corresponding to their nationality, regardless of their location in Egypt. This setup places a strain on the workforce of the two offices and poses significant risks to individuals crossing irregularly, as they must travel to Greater Cairo without proper documentation, exposing them to the risk of detention. The expenses associated with traveling to the UNHCR office entails substantial expenses, including transportation and other related costs. Affording these expenses becomes increasingly challenging for entire families undergoing this process, let alone covering additional expenses for registration with Egyptian authorities and obtaining residency permits later on.

### **Risks Due to Registration Service Challenges**

This pattern of delay poses extremely high risks for various vulnerable groups, including first-time asylum seekers, refugees, individuals with expired documentation, unaccompanied children, newborns, and victims of violence and violations who lack documentation or possess expired papers. These risks include possible detention by Egyptian authorities due to the lack of residency permits, entry permits, or registration cards, forcing individuals into involuntary violation of the law due to the lack of alternative means, thereby exposing them to detention. It also heightens the likelihood of severe violations without access to legal protection or representation.

Risks also include the deprivation of all services provided by the Egyptian government or international and local organizations. Such services encompass medical, educational, social, and emergency services, as well as access to the local justice system and communication networks, including the internet. This is due to the fact that identity documentation and valid residency permits are mandatory requirements for accessing services from all providers.

Additionally, affected individuals are further deprived of all services offered by civil society organizations registered in Egypt, as they necessitate copies of the individuals' identity documents for registration in order to facilitate specific procedures between service providers and the Ministry of Social Solidarity.

Simultaneously, the lack of residency permits or irregular entry status, coupled with the challenges encountered during the regularization process, expose those providing assistance to individuals lacking proper documentation to potential criminalization under Egyptian law. Article 8 of Law 82 of 2016 stipulates that "every person facilitating or managing purposefully a place to harbor, gather or transport smuggled migrants, or facilitating or providing them with any services purposefully shall be penalized by imprisonment."

In recent months, amidst the ongoing armed conflict in Sudan, there has been a surge in [forced displacement](#), the number of displaced people has reached 10 million and 700 thousand people since mid-April both within Sudan and towards neighboring countries, including Egypt. However, the measures taken by the Egyptian government, including [changes in entry](#)

procedures for Sudanese individuals in contradiction to the [Four Freedoms Agreement](#), have halted regular crossings. Consequently, conflict-affected internally displaced persons are compelled to flee due to the persistent armed conflict and escalating violations against civilians, leading them to seek refuge in Egypt through irregular means, thereby exposing them to significant risks. These risks include detention, imprisonment, and forced deportation, as evidenced by various documented cases over the past three months. With challenges in registration services, the risks faced by these individuals are further exacerbated.

### **The Legal Framework and Operational Policies of UNHCR in Egypt**

According to the agreement signed between the Egyptian government and the UNHCR on 10/2/1954 - ratified by [Law No. 172 of 1954 and published in the Official Gazette on 30/3/1954](#) - a UNHCR office in Egypt was established and delegated the organization of asylum procedures, processing applications and examination thereof, granting refugee status, and issuing identity cards as stipulated in Article 27 of the Geneva Convention on the Status of Refugees signed on 28/7/1951 and ratified by Resolution No. 331 of 1981, published in the Official Gazette on 26/11/1981 . Consequently, the UNHCR in Egypt is "[the only agency that provides registration services and documentation for asylum seekers and refugees in Egypt.](#)" Under this agreement, the UNHCR office in Egypt assumes responsibility for receiving asylum applications as well as requests for protection, and regularizing the status of individuals entering Egypt whether legally or not.

As per the official website and printed/electronic materials of UNHCR in Egypt, individuals seeking asylum are required to schedule appointments in advance for the services they require. They cannot directly visit UNHCR offices for registration and must secure appointments for all registration services. These services include scheduling appointments for initial registrations, renewing documents for refugees and asylum seekers holding expired or expiring UNHCR documents within three months, adding family members to the file/card, registering newborns (under two years old), replacing lost or damaged identity documents, closing files, and other registration-related inquiries. Appointments for registration services can be arranged through the UNHCR information hotline (0227390400), available from Sunday to Wednesday, between 8:15 AM and 3:00 PM, and on Thursday from 8:15 AM to 12:00 PM.

While the official UNHCR website in Egypt features a question regarding the registration process duration in its registration Q&A section, the answer lacks specific timelines for each service or process, and fails to establish a maximum duration for these procedures. Additionally, while the website outlines avenues for lodging complaints against misconduct by staff members, it lacks a mechanism to hold them accountable for any wrongdoings due to the organizational policies in dealing with refugees and asylum seekers in Egypt and the services provided to them. This situation persists within this context.

Given the deteriorating economic situation in Egypt and the dire conditions of refugees and asylum seekers, the regularization process through a payment of \$1000, as per Prime Minister's Decision No. 3326/2023 to regulate the residency of foreigners in the country within three months of the decision's implementation, is deemed nearly impossible for refugees and asylum seekers. This renders the regularization process discriminatory, as it favors only those who can

afford the government's regularization fee. Furthermore, the government's decision to allow only three months from the issuance of the decision was described by RPE in a previous legal brief as "exploitative from a punitive perspective, violating the law and not achieving its purpose."

### **No Response or Accountability from the UNHCR in Cairo**

The pattern documented by the RPE directly linked to violations against refugees and asylum seekers in Egypt is well recognized and evident to the UNHCR in Cairo through its published reports, internal documents, and complaints received from community leaders and initiatives. However, despite this awareness, there has been no response to address the current situation and the changing dynamics, including the forced displacement from Sudan due to armed conflict and the changes introduced by the Egyptian government in the regular entry system. These changes have compelled displaced individuals to resort to perilous irregular routes, endangering their lives and rights. The [UNHCR has acknowledged the Egyptian government's failure to adhere to international agreements](#) regarding enabling detainees to lodge asylum claims and permitting visits to them and their detention centers. Failure to address this exceptional situation puts thousands of individuals at risk and warrants accountability.

### **Demands and Recommendations from the Refugees Platform in Egypt (RPE)**

#### **We demand the UNHCR to urgently undertake the following actions:**

- Address the issues stemming from the operational framework of the UNHCR, particularly concerning registration and protection services, which are fundamental to the mission of the UNHCR office both globally and specifically in Egypt, and ensure accountability for the violations arising from this operational pattern implemented by the UNHCR.
- Given that obtaining an appointment does not necessitate employee intervention, thereby sparing limited human resources, there is a pressing need to establish a digital registration system. Such a system would facilitate appointment scheduling without prolonged waits and the inability to reach staff due to insufficient personnel handling calls on the registration services hotline, especially considering the daily influx of cases requiring appointments.
- Increase the workforce capacity in registration services and enhance the efficiency of personnel in handling applications, including addressing all aspects of complaints submitted by asylum seekers and refugees in Egypt.
- Incorporate comments and reports from community leaders, initiatives, and local organizations into the response plans and development of the UNHCR.

#### **We demand that the Egyptian government issue directives to its ministries and various entities to:**

- Take into consideration the situation of those undocumented with the UNHCR, and abstain from holding them accountable, prosecuting them, or subjecting them to legal consequences for their involuntary status. Moreover, uphold constitutional and legal

obligations, particularly Article 31 of the United Nations Convention relating to the Status of Refugees, which holds legal force following its publication in accordance with Article 93 of the Egyptian Constitution. This article stipulates that refugees and asylum seekers should not be penalized for irregular entry or presence.

- Expedite the procedures for obtaining residency permits for refugees and extend the duration of residency permits to a minimum of two years or a maximum period based on the expiration date of the refugee or asylum seeker registration document.
- Eliminate the legal and administrative barriers faced by refugees and asylum seekers, enabling them to pursue their rights to fair and expedited judicial proceedings without impediments, as stipulated in Article 97 of the Egyptian Constitution and the second paragraph of Article 16 of the United Nations Convention relating to the Status of Refugees. This should take into account the legal jurisdictions where refugees and asylum seekers are compelled to reside.
- Enable refugees and their families to enroll in educational systems at various levels, particularly at the primary level, without obstacles. Education is a fundamental right for every individual, and non-compulsory registration should not justify depriving individuals of their right to education.