

New Responses to the Refugee Crisis: Promises and Challenges in Uganda

A case study of World Bank financing for refugee-hosting nations

COVER:	South Sudanese refugees are seen in Zone 2, Bidi Bidi, Uganda, April 6, 2018. Photo by Tara Todras-Whitehill/International Rescue Committee.				
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A New Response to the Protracted Refugee Crisis in Uganda

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Executive Summary

Uganda, in many ways, is ground zero for new global initiatives to address largescale, protracted displacement. It has hosted refugees from neighboring countries for decades, and today hosts the largest refugee population in Africa.

At the 2016 Leaders' Summit on Refugees and Migrants, Uganda doubled down on its progressive refugee policies, which allow refugees to work, go to school and access land. It opted to be the first country to pilot the Comprehensive Refugee Response Framework of the New York Declaration. And it is among the first countries to receive financing through a new sub-window of the World Bank's 18th replenishment of its International Development Association (IDA18), created to provide additional concessional financing to low-income countries hosting large numbers of refugees. Together, these commitments, framework and financing offer immense potential to meaningfully improve the lives of refugees and Ugandan host communities.

All eyes are on Uganda as an early adopter of these new tools and funding. How will World Bank-funded projects be balanced with existing humanitarian interventions for refugees—which are extensive in Uganda? How will the Bank interact with the complex set of actors, including the government, UN Refugee Agency (UNHCR), non-governmental actors (NGOs), civil society, and refugees themselves? Will the Bank adapt its projects or move forward with business as usual in these unique contexts? Will the Bank's initiatives encourage other donors to provide multiyear financing and support long-term solutions for refugees and host communities?

This case study starts to answer these questions by examining Uganda's recent policy approaches and initiatives that respond to refugee and host populations. Although it is still early days, observations so far suggest mixed results. The Government's willingness to engage with these new platforms and maintain its progressive refugee policies, especially in the face of global actors

retreating from their share in the responsibility for responding to refugee crises, is impressive and important.

However, early concerns about implementation have been, in some instances, validated. While the World Bank's financing and CRRF are "pulling in the same direction", there are no formal agreed on outcomes and no formal linkages between the funding and the framework. The process for making decisions about policies and programs have seemingly marginalizes NGOs and refugees themselves, even though there are new structures meant to give them a voice. And most Bank-funded projects in the pipeline piggyback on existing Bank programs, bringing refugees into projects that were already in train; it is unclear to what extent these projects will adapt to reflect refugees' experiences.

Based on these observations, this case study offers recommendations for the Government of Uganda, donors like the World Bank, UNHCR and other stakeholders. It calls on the Government to foster better coordination and collaboration between different levels of government and to lead on simplifying and aligning decision-making processes for the CRRF implementation and World Bank financing. It recommends the World Bank and UNHCR develop more deliberate consultative process to include a broader range of actors; help bring other development actors to the table; and to work with partners to identify a clear set of outcomes they want to achieve with the new financing and frameworks. It suggests NGOs more proactively engage with the World Bank to share their expertise and help shape program and policy decisions based on their years of working with refugees.

Introduction

Uganda has hosted large numbers of refugees from its neighboring countries for decades. It is Africa's largest refugee-hosting country, and one of the top five hosting countries in the world, most recently receiving large numbers of refugees from South Sudan, the Democratic Republic of Congo, and Burundi. UNHCR reports that there has been a 68 percent increase in the number of persons of concern in 2016, numbering somewhere around 1.4 million.² It has responded in varied ways, evolving to match the trends of displacement. Most recently, Uganda has instituted a relatively progressive refugee policy; its policy allows refugees to work, access to land, and some freedom of movement within and outside of settlements.

Uganda is an important example to consider in light of new initiatives to address large-scale, protracted displacement at the global level. Broadly speaking, Uganda has recognized early on that it is dealing with a protracted displacement situation.3 In June 2016, the government and partners held a Solidarity Conference, which aimed to get donors to pledge additional multiyear financing for longer-term solutions. Although the Summit came up short and longer-term solutions were put on the backburner behind the immediate emergency and addressing root causes of displacement, more recent initiatives have shown movement in other ways. For instance, Uganda was the first country to roll out the Comprehensive Refugee Response Framework (CRRF) of the New York Declaration on Refugees and Migrants, and is one of the first eight countries to receive additional multiyear financing from the World Bank's IDA18 refugee subwindow.

Uganda is also a natural starting point for an examination of development-led approaches to displacement because of its policies that have allowed refugees more opportunities for integration and selfreliance. While these have not been without their flaws, they have been the basis for research and advocacy for greater freedom of movement and the right to work—two of the most important obstacles to overcome in any protracted refugee situation.4 Indeed, Uganda has demonstrated the potential of the

displaced to contribute to their local host communities. Research shows refugees are well-networked, can make a positive economic contribution both as business owners and as employees, are economically diverse, and are users and sometimes creators of technology.5 This potential forms an important backdrop for new World Bank financing in Uganda. and demonstrates why it is ripe for Bank projects to be done in ways that enhance the ongoing work of the Ugandan government, civil society, NGOs, donors, and, of course, refugees and host communities themselves.

This case study builds on an IRC-Center for Global Development policy brief, Tackling the Realities of Protracted Displacement: Case Studies on What's Working and Where We Can Do Better, which included initial findings. It briefly introduces the historical and political context of refugee-hosting in Uganda, before examining Uganda's policy approaches and recent initiatives and efforts. It then looks closely at efforts by the World Bank to become more involved in displacement-related projects and financing through the IDA-18 refugee subwindow. Finally, the study offers recommendations for the government of Uganda, donors like the World Bank, UNHCR and other stakeholders.



The International Rescue Committee in Uganda

The IRC has been active in Uganda since 1998, and has assisted nearly 1.2 million people since then. The IRC's work is focused in the West Nile, Acholi and Karamoja sub-regions, as well as in urban Kampala, working specifically to:

- Provide women with resources and services to assure their safety, health and financial independence, as well as prevention and response to gender-based violence with particular programs targeting adolescent girls and men;
- Provide protection services, including legal services, community services with support for refugee leadership structures, specific provisions for persons with specific needs, and systematic provision of information on available services including a referral mechanism;
- Provide cash and cash for work opportunities to recently arrived refugees;
- Teach vocational, business, and financial literacy skills, providing them with seed grants for business initiatives and support to run Village Savings and Loans Associations;
- Construct health centers, provide medical equipment, medicines and supplies, train health care workers, and educate communities to improve health and nutrition;
- Teach local community members to diagnose and treat common illnesses and make referrals to health centers; and
- Ensure all children are immunized and uptake in family planning is increased, by deploying new mobile app technologies and community engagement strategies.

ABOVE: Domitila Kaliya, a Congolese refugee living in Kampala, stands outside of her shared workspace. Photo by Andrew Oberstadt/IRC.

Displacement in Uganda: Historical and political context

Uganda, which has hosted refugees for decades, is home to more than 1.3 million refugees and asylum seekers, including from South Sudan, the Democratic Republic of the Congo, Burundi, and Somalia.⁶ Recent years have seen a spike in refugees fleeing to Uganda. For example, since 2012, the refugee population in Kampala has nearly doubled.7 In 2017 alone, an average of 1,800 South Sudanese refugees were crossing Uganda's borders per day to escape a violent civil war and famine.8 Approximately one-fifth of refugees live in Bidibidi settlement, which opened in August 2016, though Uganda is well-known for having refugees that live in both rural and urban areas.

Poverty remains high and widespread across the country, with 21 percent of Ugandan citizens living below the national poverty line. This is especially acute in host settlements and transit areas, which have some of the country's highest levels of poverty and lowest human development indicators. Although overall unemployment in Uganda is relatively low, youth unemployment is a serious challenge, making up 64 percent of total unemployed persons.9

More than half of refugees in Uganda are children. Only 46 percent of school-aged refugee children have access to formal and informal education, with a significant gender gap in enrolment.¹⁰ There is also significant overcrowding in early childhood centers and schools, with some classrooms exceeding 150 children to a single teacher.11

In addition, while Uganda's refugee policy is indeed progressive compared to its neighbors, refugees still struggle daily. One report emphasized increased attacks on refugees by locals, as well as tensions between hosts and refugees, where refugees appear to be receiving assistance that hosts cannot access. 12

Another important development relating to the refugee situation in Uganda came to light in early 2018, when

Ugandan and UNHCR officials were accused of inflating the number of refugees and mismanaging funds. Other allegations include faking documents on delivery of food assistance and demanding that refugees pay bribes to access services that should be free.¹³ This led to the suspension of the Ugandan Commissioner for Refugees and launched a recount of refugees using a biometric registration system.¹⁴ While refugee registration is the responsibility of the Ugandan government, UNHCR is making its registration tools available in Uganda in order to quickly verify the refugee population and "strengthen the integrity of the data underpinning the refugee operation."15

The World Bank has not rushed to judgement in light of the recent news of discrepancies in numbers. It remains to be seen how other donors will respond, including the United States, the European Union and the United Kingdom, who have made some strong statements and threatened to withhold funding. Both the technical and political aspects of the current situation and investigation are delicate and timeconsuming, and will likely impact how the CRRF is rolled out and how the Bank continues to be involved.

Uganda's refugee policy, response framework, commitments and financing

An historical overview of Uganda's refugee policy

Uganda has had a long history of sending and receiving refugees. 16 While it used to relegate refugees to closed camps in the name of security concerns, in recent years it has adopted a number of policies that give refugees freedom of movement, the right to work and own a business, and equal access to social services, such as primary education and health care, and even allocated land to each refugee household to allow for economic independence through agricultural livelihoods. 17 The 2010 Refugee Regulations require the Commissioner for Refugees to ensure the integration of refugees into local communities and to sensitize host communities regarding co-existence, and to liaise with national, local and regional planning authorities to ensure refugee concerns and related matters are taken into consideration, particularly as relates to sustainable development and environmental plans. It also fosters affirmative action that is intended to favor women, children, and persons with disabilities.

Year 2016: A turning point to make refugee inclusion a reality

The year 2016 was a turning point for integrating refugees into the Government's development plans. At the Leaders' Summit on Refugees in September 2016, the Government of Uganda pledged to continue its settlement approach, provide newly arrived refugees with access to education and employment opportunities, and finalize and implement its Refugee and Host Population Empowerment (ReHoPE) framework. Shortly after the Summit, Uganda also agreed to be the first country to officially rollout the CRRF.18

These pledges built on Uganda's development strategies that include refugees. The government's ReHoPE strategy—a multi-year strategy for enabling self-reliance and resilience among refugees and host communities—is integrated into the UN Development Assistance Framework for Uganda (UNDAF 2016-20202). The Settlement Transformation Agenda (STA), a part of Uganda's five year National

Development Plan II (2016-2020), recognizes that refugee-hosting areas are in need of special attention due to the added demands of hosting displaced populations, and aims to integrate refugee services structures with government structures. A Government directive also commits humanitarian actors to ensure 30 percent of assistance services (other than food assistance), where appropriate and feasible, benefits the host community.

Beyond these national plans, the Ugandan government has signed on to several regional refugee response agreements. In 2017, Uganda signed the Nairobi Declaration, which aims to coordinate a regional response to the Somali refugee crisis, and later signed the Djibouti Declaration, which commits countries to improve access to and the quality of education for refugees.

Financing to support Uganda's bold pledges

All the pledges Uganda made in 2016 are intended to be met through the government's strategy for implementing the CRRF; however, none of these goals will be achieved without adequate fundingwhich remains a chronic sticking point for the country. UNHCR's 2017 operating plan for refugees in Uganda was only 29 percent funded, and the country's part of the South Sudan emergency appeal was only 16 percent funded, whereas globally UNHCR's plans are 54 percent funded. 19 A Solidarity Summit in 2017 aimed to raise \$2 billion to support both immediate and longer-term needs of refugees and host communities, but managed to raise just \$350 million, with most going to emergency response.²⁰

Since then, Uganda approved a \$50 million loan from the World Bank to implement a five-year effort that will support the STA and ReHoPE. Uganda also received eligibility to draw on IDA18 subwindow resources to support refugees and host communities; as of July 2018, a \$29M grant (\$251M IDA credit) has been approved for an integrated water management and development project in Uganda, as well as a \$335M IDA grant for support to municipal infrastructure.²¹ Commitments by other donors have also emerged,

including \$2.5 million from Norway for technical assistance, analytical support, and to generate evidence of what works to improve refugees' lives.

National arrangements and decision-making

The Ugandan Government has remained in the driver's seat in designing a strategy for implementing the CRRF and other relevant frameworks. The Permanent Secretary of the Office of the Prime Minister (OPM) chairs the CRRF steering group, which is supported by a small secretariat, and features 32 representatives from within the government, such as relevant line ministries, department and agencies, and organizations external to the government, including UNHCR, the World Bank and other donors, and international and national NGOs. Local populations are, or soon will be, directly involved—a refugee welfare forum is under creation to ensure refugees are included and representatives of district chairpersons and chief administrative officers represent local host communities.²²

Importantly, Uganda's CRRF Secretariat has indicated it will develop a results framework and related indicators to track progress against its commitments and to identify priority areas for international support. The results framework will include both indicators that are universal to all CRRF countries (which are expected to be developed by UNHCR) and indicators specific to Uganda.²³

Beyond the steering group and its secretariat, there is a plethora of coordinating platforms ostensibly linked to the CRRF governance framework. These include the semiannual National Partnership Forum; sector working groups; the Local Development Partners' Group and Development Partner Technical Working Groups; the Humanitarian Donor Partners Group; the CRRF Development Partners Group; the National NGO Forum; and the Regional Durable Solutions Secretariat for the East and Horn of Africa.²⁴

Despite efforts to establish a clear governance framework, lack of coordination among these groups, with the overarching CRRF platforms and around new World Bank financing remains a major challenge. Stakeholders have suggested that a better and possibly simpler coordination model that streamlines some of these groups is essential and among the most important areas for improvement.

Further, responsibility for meeting the needs of refugees remains largely with the OPM Department of Refugees, supported by UNHCR and NGOs, rather than as embedded in the portfolios of work of other ministries. There are also competing priorities between local leadership, district leadership, and national authorities, including which projects are the most urgent to fund, and the extent to which refugees should receive assistance compared to host communities. External and internal politics, for example, mean that different branches of governments see the CRRF, IDA18 financing and new coordination differently. Indeed, there have been some parallel processes where OPM management of settlements runs separately from the local governance structures—a set up that produces challenges in trying to shift to a model where all line ministries also cover refugee-related issues. To address this concern, the World Bank's approach seeks to support government capacity and ownership of refugee issues across all relevant ministries, from health to education to finance. This contrasts the previous model where refugees have been an isolated issue that has not been seen within the purview of other ministries. From integrating into development plans, to incorporating into budgets and holding meetings with mainline ministries, the Bank urges this type of integration and capacity building. As the Bank holds meetings with different government actors and begins implementing programs, it will be better-positioned to push this model in the coming months.

World Bank refugee-related projects in Uganda

The World Bank is not new to working with refugee populations in Uganda, though refugees have not been an explicit focus of Bank interventions. Indeed, a number of World Bank projects have included refugee-related aspects; although, broadly speaking, the Bank's projects have emphasized building the capacity of government institutions and services. The Bank's overarching focus vis-à-vis northern Uganda where IDPs and refugees have tended to concentrate—has been on the significant disparities in economic diversification and poverty levels between the North, other regions, and national averages.

Today, the World Bank in Uganda has adopted a multi-year strategy, with plans to eventually be active in 11 districts across the country, where over one million refugees and asylum seekers reside.²⁵ Uganda and the World Bank intend to use the IDA18

subwindow financing for a range of projects in a variety of sectors, including infrastructure, livelihoods, education, health, land tenure, and gender. Projects in the pipeline largely piggyback on existing efforts, bringing refugees into the projects that were already in development or implementation. Specific projects are still in early stages; however, support to ReHoPE and a regional project are underway.

The ReHoPE framework, which is supposed to be folded into the CRRF, was created by the Office of the Prime Minister (OPM) (which is centrally responsible for all refugee-related matters), the World Bank and UNHCR. ReHoPE seeks to shift the focus to multiyear and multi-sectoral approaches; ensure coordination that spans both humanitarian and development aid; ensure that the Ugandan government is in the lead; and collectively address the refugee and host community needs. It therefore spans a wide range of sectors, and demonstrates the Bank's focus on building government capacity (as opposed to substitution, which is often what NGOs and the UN are accused of in protracted refugee situations), and emphasizes working with host needs alongside the needs of refugees.

The regional project, Development Response to Displacement (DRDIP) is located under this umbrella structure. DRDIP is a regional project under the Intergovernmental Authority on Development (IGAD) that spans Uganda, Ethiopia, and Djibouti. It seeks to expand refugee access to social services, economic opportunities and environmental management for refugees and host communities across East Africa. It has four components: 1) social and economic services and infrastructure; 2) sustainable environmental management; 3) livelihoods programming; and 4) project management, monitoring and evaluation and

institutional support. It has also supported the establishment of the Regional Secretariat on Forced Displacement and Mixed Migration, which is meant to spearhead the development approach to displacement in the Horn of Africa.26

As noted above, the Bank is also providing additional financing to a municipal infrastructure development project, which aims to help local governments improve urban service delivery. The additional financing will be used to scale-up and restructure the program so that it covers an additional eight municipal local governments—those which have faced a high influx of refugees—and can extend for another five years.

In addition, financing is expected for a water and sanitation project and a secondary education project. The World Bank is also seeking to work on sexualand gender-based violence (also through DRDIP) by embedding measures across the program that incorporate strategies to mitigate any risk of genderbased violence (GBV) that could result from project activities or that is already present in the community. It seeks to promote norms, fostering long-term social and cultural change toward gender equality.²⁷ Other potential focus areas include fiscal planning, land tenure (in the North), and resettlement.28

Beyond these individual projects, the World Bank intends to work with Uganda, the UN, and NGOs to improve data, including carrying out a household survey of refugees and host communities, updating data, and conducting a Survey of Well-Being via Instant, Frequent Tracking (SWIFT) system survey, which measures poverty rates. This will allow for improved needs assessments and support measurement of progress towards improved socioeconomic status.

LEFT: People learn hair dressing and styling skills at a Livelihood Center in Kampala, Uganda, April 3, 2018.

Photo by Tara Todras-Whitehill/International Rescue Committee

Challenges and concerns

Uganda is at a pivotal moment in its refugee hosting approach. While its progressive policies of recent years have received praise, they are not always fully implemented and refugees remain in difficult conditions. Ugandans also continue to struggle; Uganda's economic growth has slowed and poverty is increasing in some parts of the country.29

The Uganda National House Survey report from 2016/17 by the Uganda Bureau of Statistics, for example, indicates that the number of poor people increased from 6.6 million in 2012/13 to 10 million in 2016/17 (an increase from 19.7 percent to 27 percent).30 Interestingly, the areas that host refugees have not been hit as hard, in part due to the influx of humanitarian actors, which entails increased cash flows through office and home rentals, service contracts, and the purchase of goods and supplies. It also demonstrates that hosting refugees need not be seen as an automatic drain on local economies.

It is too early to fully expect Uganda to have created a perfect plan that exhibits the goals of the CRRF and smoothly bring the World Bank into the refugee response space through the IDA18 refugee subwindow. However, there are a number of important areas that need additional clarity and action to improve upon the current plans and activities.

There remains a lack of clarity among aid organizations around how the World Bank's IDA18 refugee subwindow financing relates to the CRRF. While the two are both "pulling in the same direction," there are no formal linkages between the financing and the CRRF, and many key stakeholders, including NGOs who have worked with refugees in Uganda for decades, are largely unaware of or are confused about what the Bank is doing in the refugee response.31 Indeed, many NGO staff in Kampala interviewed for this case study had not realized that the Bank was responding to displacement.

Platforms for coordination exist and communication is improving, but need to be better utilized and likely streamlined. In Uganda, as is the case in most countries around the world, development and humanitarian actors tend to work in their own spheres and with separate stakeholders. There are joint sector working groups among development actors, but they have little intersection with humanitarian groups, which have their own working groups and interagency coordination meetings at the settlement and national level on a regular (weekly/monthly) basis. Individuals interviewed cited the need to incentivize further collaboration between humanitarian and development actors, as well as with national and local governments. The CRRF Steering Group and Secretariat have not proven adequate for achieving

The World Bank also struggles with scope. Interviewees internal and external to the Bank noted that it is easy for the Bank to be expected to be everywhere all of the time. The Bank does not have a specific mandate to work with one population, and often responds to multiple impoverished populations where it has programs; specific funding for displacement-affected populations is new and can make project design and implementation more complicated. With new Bank staff arriving in country to focus specifically on responding to displacementrelated issues, it is hoped that there will be a more targeted effort to manage relationships, project design and planning, monitoring, and other facets of the new work.

Similarly, the Bank works at a different pace than humanitarian actors that respond to refugee crises. The Bank has a notoriously slow rate of approval for projects, which makes planning with UNCHR and NGOs potentially difficult. Indeed, it took more than nine months for approval of one project to be adjusted so that it extends to refugee hosting areas. The Bank's slow pace, compounded with a slow-moving legislature in Uganda, means that planning around World Bank-funded projects could go on for years. It is

a good sign that the two recent projects have been approved (the Municipal Infrastructure Development Program and the Integrated Water Management and Development Project) by the Bank to move forward. However, it is not clear how these tendencies will mix with the humanitarian response, which is often characterized by emergency-response approaches.

More broadly, the Bank is having to adjust to a different work environment—one with a large number of NGOs, UN agencies and other groups interested in having a seat at the decision-making table.32 In contrast to humanitarian actors, which often do projects separately from governments, the World Bank's main partner tends be the government. Under this new financing subwindow, the Bank has acknowledged the need to better collaborate and consult with a wider range of actors, including nongovernmental organizations and agencies. While the Bank has built a strong partnership with UNHCR in Uganda, it has not yet adequately extended its collaboration and consultation to other implementing organizations. Despite the CRRF Steering Group and Secretariat with NGO representation in the OPM, and various working groups underway, it seems the current model facilitates discussions through separate channels that continue to marginalize NGOs and refugees themselves (e.g., Bank-OPM, OPM-UNHCR, Bank-UNHCR).

Although the Bank has been explicit that it affirms refugee rights and freedoms, it is mainly focus on reducing poverty and improving socioeconomic wellbeing. The Bank therefore comes to Uganda with a set of goals and priorities different from—and potentially at odds with—humanitarian priorities. This can lead to different prioritization of programs and policies. On the program side, the Bank has prioritized large infrastructure projects—building health facilities, roads, schools, bore holes—over ensuring social and economic needs—psychosocial services, access to savings accounts—are met. On the policy side, the Bank may question Uganda's settlement policy because it is not creating enough economic benefits: meanwhile, humanitarian organizations would warn against questioning the policy because doing so could lead to a reversal of rights access for refugees in Uganda. The stakeholders involved these types of program and policy decisions need to work together

more closely to ensure that investments and actions work towards common goals, and messaging to the Ugandan government is complementary.

Likewise, some protection actors in Uganda are concerned that the Bank is not fully versed in the ways governments can skirt or ignore important refugee protections, including arbitrary arrests (or arrest for very minor infractions) of refugees particularly in towns; requests of increased fees for education services (in towns near settlements where refugees have moved); or unavailability of private spaces in police posts or female police officers that would increase reporting of sexual and gender-based violence (SGBV). The Bank has accountability and safeguards to ensure that corrupt and rights-violating governments are not rewarded and lose funding, but concerns remain. UNHCR and NGOs are represented within in the CRRF structure that sits with the OPM in Uganda, which suggests there is closer coordination and monitoring of protection violations; however, there is yet to be formal coordination with the Bank on these issues.

Another area where the Bank will be important and active is the improvement of data, particularly socioeconomic data on refugee and other displaced groups. In partnership with UNHCR, the Bank aims to apply its expertise in improving Uganda's data collection and analysis. This effort is still nascent, and will be critical to specify how the data improvements will be used vis-à-vis the CRRF.

Finally, it remains to be seen how regional bodies and a regional response will play a role in IDA18 planning. Although the Bank has a so-called regional project, DRDIP, that covers Uganda, Ethiopia and Djibouti, it appears the planning and program design are distinct for each country. That said, in considering its role with displaced persons in the region, the Bank has had increased involvement with IGAD, the regional body in East Africa, in recent meetings and through DRDIP implementation. Uganda is a prime example for where a regional approach is critical: human rights, security, economic and social concerns vis-à-vis displacement in Uganda are directly linked to its neighboring countries. Likewise, Uganda sends some asylum seekers to neighboring countries, again affecting the regional dynamics.

Recommendations

Uganda is still charting its path forward, and many of its struggles are exemplary of conversations on the international level: what to do with large numbers of refugees in protracted cases, how to improve responsibility sharing, and can development actors more fully engage in displacement?

Despite ongoing challenges, the potential in Uganda to remain an example of refugee hosting is still prominent; the government remains open and willing to promote the principles of the CRRF, and to work closely with the Bank on IDA18 projects. Given its relatively open door, large numbers of refugees who remain desperate and in need of greater access to

their rights and improved assistance in the short- and long-term; proliferation of NGOs, and history of hosting the displaced, it remains among the most important countries to put the principles and objectives of the CRRF into practice.

While progress can be slow as actors feel their way in this new framework, refugees remain desperate and in need of greater access to their rights and improved assistance for the short-term, and livelihoods opportunities for the long-term. Based on observations of progress and challenges, the following changes should take place.

The Government of Uganda should:

- 1. Define a set of outcome targets for CRRF implementation and World Bank financing, in consultation with UNHCR, the World Bank and NGOs. Targets should align with the Sustainable Development Goals, which Uganda is working to achieve.
- 2. Incentivize greater collaboration between national, district and local authorities to align their strategies and reduce tensions between them. This might require appointing a focal person or office to help merge parallel systems and integrate refugee work across line ministries.
- 3. Use the Government Annual Performance Review monitoring plan to outline how government line ministries can take a greater leadership role on sector-specific refugee issues, and how the Bank can support these institutions.
- 4. Simplify the governance structure for the CRRF and ensure the process is aligned with decision-making around World Bank financing. IDA18 subwindow funded projects and the CRRF should be linked up, including on data, communication, program design and funding cycles.
- 5. Encourage partnership and system strengthening approaches between humanitarian organizations and the public sector so humanitarian and development operations build on existing capacity and knowledge.

The World Bank and UNHCR should:

- 6. Develop a clearer and more deliberate process for communication and collaboration with NGOs and other donors to prevent duplication. The Bank and UNHCR should work to streamline existing coordination platforms.
- 7. Ensure World Bank financing adequately addresses refugees' unique circumstances and needs. This will require closer consultation with those in the settlements and wider districts; a joint mission between UNHCR, the World Bank, Ugandan government and NGO staff should be organized.

- 8. Continue to invest in Uganda's capacity to improve data and statistics on refugees and host communities, and map out how subwindow financing can support.
- 9. Engage civil society and academic groups in Uganda to initiate studies on the impacts of the IDA18 subwindow projects and CRRF implementation.

NGOS should:

- 10. Seek to understand joint priorities and objectives of the Government, UNHCR, and the World Bank and determine how best to collaborate toward shared goals.
- 11. Reach out to the Bank to share expertise and knowledge from their years on the ground and emphasize where their expertise is unique and where the Bank will bring added value. This can help to prevent "turf wars," which do not serve the interests of anyone, most importantly the displaced, and instead foster complementarity—and possibly collaboration.
- 12. Closely coordinate with donors on what IDA18 subwindow financing will mean and what it will not mean in Uganda. Concerns about losing donor funding are palpable among NGOs in Uganda; NGOs should seek greater clarity and assurance as relates to their programming and aims in Uganda.

Other development donors should:

13. Align refugee-focused financing against the objectives of the CRRF, and identify linkages and complementarities with World Bank projects to avoid duplication.

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The International Rescue Committee (IRC) responds to the world's worst humanitarian crises and helps people to survive and rebuild their lives. Founded in 1933 at the request of Albert Einstein, the IRC offers life-saving care and life-changing assistance to refugees forced to flee from war, persecution or natural disaster. At work today in over 40 countries and 29 cities in the United States, we restore safety, dignity and hope to millions who are uprooted and struggling to endure. The IRC leads the way from harm to home.

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