For privacy reasons, the names of individuals featured in this document may have been changed.

COVER: A mother with her child, in the Far North. Photo by Tyler Jump/IRC.
New Responses to the Refugee Crisis: Promises & Challenges in Cameroon
A case study of World Bank financing for refugee-hosting nations
International Rescue Committee | June 2019

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Executive Summary

Cameroon aspires to meet the Sustainable Development Goals (SDGs) by 2030 and become an upper-middle-income country by 2035. Until recently, it had avoided the instability and violence that other countries in the central African region have experienced, but the country is increasingly vulnerable and today faces three forced displacement situations: refugees from Nigeria and internally displaced persons (IDPs) fleeing Boko Haram in the Far North region, refugees from Central African Republic (CAR) in the East region, and IDPs in the Northwest and Southwest regions.

Despite these challenges, the government of Cameroon has a progressive refugee legal regime and made commitments in 2016 to expand refugee protection. In support of this effort, Cameroon became one of the first countries to receive financing through a new sub-window of the World Bank’s 18th replenishment of its International Development Association (IDA18), which provides additional financing to low-income countries hosting a large number of refugees. The projects financed by the sub-window seek to strengthen Cameroon’s health and education systems, support decentralized local governance, and strengthen social safety nets to benefit both refugees and host communities.

The Bank’s sub-window financing is a bold new approach to protracted forced displacement in Cameroon and elsewhere. But questions remain: What steps will the Bank take to negotiate the politically sensitive policy questions unique to refugees, like their movement and access to services? What role can the Bank play to ensure refugee protections, including against forced returns? How will the Bank engage with and learn from existing humanitarian responses? How will humanitarian actors, including UN agencies, NGOs, civil society, and refugees and host communities perceive and evaluate these new programs? Will this approach encourage other donors to commit to multiyear financing and invest in medium-term solutions to displacement? And, finally, will this financing ultimately have an impact on the lives of refugees and their hosts?

This case study, which draws on the literature and key informant interviews in early 2019, uses the World Bank’s investment in Cameroon’s refugee response to investigate these questions. It finds the government’s adoption of progressive refugee policies and willingness to engage with new approaches are commendable. However, the government has not yet fully delivered on its commitments, including around forced returns, and there is significant concern among the humanitarian community that Cameroon may not robustly implement its progressive policies. With regards to the World Bank-funded projects that expand existing Bank work to areas hosting refugees, it is unclear how they will include refugees in decision-making or adapt to their particular needs.

Based on these observations, this case study offers recommendations for the government of Cameroon, the World Bank, UNHCR and other donors. It calls on the government to appoint a focal point for response to forced displacement; create a taskforce of relevant government officials and development and humanitarian partners to support policy and program implementation; and include refugees in national development plans and SDG voluntary national reviews. It calls on the World Bank to develop a set of outcomes for its sub-window financing and align progress indicators against them; define conditions for Cameroon to maintain a sufficient refugee protection framework; and standardize its consultation process with NGO actors and refugees.

OPPOSITE: An IRC counsellor facilitating training on sewing in Mémé. Photo by Thierry Kamdema.
Introduction
Cameroon has aspirations of meeting the Sustainable Development Goals by 2030 and becoming an upper-middle-income country by 2035. While economic growth has accelerated over the last decade, the number of poor people in the country rose by 12 percent between 2007 and 2014. Until recently, Cameroon had avoided the instability and violence that other countries in the central African region have experienced, but the country is increasingly vulnerable. Persistent attacks by Boko Haram on the border in the Far North, influxes of refugees from neighboring countries, and violent confrontation between government security forces and separatists in the Northwest and Southwest regions put development gains at risk.

Today, Cameroon faces three forced displacement situations: refugees from Nigeria and internally displaced persons (IDPs) who fled Boko Haram violence in the Far North region, refugees from Central African Republic (CAR) in the East region, and IDPs in the Northwest and Southwest regions. The Government of Cameroon has adopted relatively progressive refugee policies, guaranteeing refugees’ freedom of movement, the right to work, and the right to access healthcare and education equivalent to Cameroonian citizens.

Despite these policies, households in refugee-hosting areas are disproportionately poor: they comprise 66 percent of poor households, but only 38 percent of the national population. The extent to which refugees are integrated with host communities varies greatly by region. Most CAR refugees (69 percent) are integrated into villages with host communities, rather than refugee-dedicated areas. In the Far North, Nigerian refugees comprise a smaller fraction of the population, and over 50 percent of Nigerian refugees live in Minawao camp; others live in informal camps for displaced persons, and in communities outside of camps alongside host populations. (See Figure 1 for a snapshot of the current displacement.)

Moreover, implementation of these policies has been uneven. For instance, it appears that CAR refugees enjoy more of the rights they are guaranteed than Nigerian refugees. Worse, in the Northwest and Southwest regions, government forces and separatist supporters have clashed, displacing hundreds of thousands of civilians.

Humanitarian funding for refugees within Cameroon is dwindling despite persistent needs. While donors funded 45 percent of Cameroon’s Humanitarian Response Plan in 2018, just 19.5 percent of funding requirements for refugees were met. Notably, in 2018, the World Food Programme reduced by half the number of people receiving monthly food rations due to budget shortfalls.1 In the face of these realities, and increased global demand for humanitarian assistance, the government has welcomed development-led approaches to address forced displacement. This approach comes with financing that is not dependent on the system of humanitarian appeals and can support longer-term response and recovery.

As global actors pivot toward development-led approaches to address situations of protracted forced displacement, Cameroon is an instructive example. The government of Cameroon has acknowledged the protracted nature of forced displacement and the fight against Boko Haram. To confront these challenges, the government expressed a willingness to collaborate with international actors, including the World Bank and UNHCR on medium- and long-term solutions, both at the 2016 Leaders’ Summit and in its 2017 Letter of Development Policy. Cameroon is one of the first countries to receive additional multiyear financing

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from the World Bank’s IDA18 refugee sub-window, and it is the first to have its projects approved by the World Bank board. But these commitments will only drive improvements in people’s lives as well as economic growth in so far as they are implemented.

New World Bank financing presents opportunities for donors, NGOs, civil society, and refugees to advocate for the government to implement its stated policies comprehensively and equitably. This case study describes these opportunities. It briefly introduces the historical and political context of refugee-hosting in Cameroon. It then analyzes Cameroon’s policy approaches and commitments. Third, it examines the World Bank’s approach in Cameroon with a focus on displacement-related projects through the IDA18 refugee sub-window. Last, it offers recommendations for the Government of Cameroon, donors, and other stakeholders responding to forced displacement.

The International Rescue Committee in Cameroon

The IRC has been active in Cameroon since April 2016, when it launched an emergency response to displacement in the Far North caused by the Boko Haram insurgency. The IRC has since transitioned to a long-term program in Cameroon. Through 2020, IRC will maintain its presence in Logone et Chari, and expand within Mayo Sava and Mayo Tsanaga. Its programmatic priorities focus on two outcome areas, economic well-being and safety. IRC’s programs seek to enable conflict-affected populations to meet their basic needs and avoid negative coping strategies, and to ensure people are safe in their communities and receive support when they experience harm. Specifically, the IRC works to:

- Provide safe spaces to sexual assault survivors and women and girls, where they can access counseling and referrals to social and legal services.
- Deliver monthly cash transfers to help the most vulnerable families to meet their needs transition out of survival mode, and generate their own income.
- Help form and support village savings and loan associations, enabling members to pool resources for income-generating economic activities.
- Offer vocational training for youth and at-risk women and girls to provide them with market-relevant skills.
- Improve sanitation by constructing new pumps and sex-segregated latrines and providing basic household materials and training.

Learn more at: [https://www.rescue.org/country/cameroon](https://www.rescue.org/country/cameroon)
Contemporary context for forced displacement in Cameroon

Cameroon has a long history of hosting refugees, beginning in 1972, when it temporarily hosted 200,000 refugees fleeing Equatorial Guinea. Today, Cameroon’s President, Paul Biya, frequently invokes this history of generously hosting refugees and asylum seekers as a point of pride.

As of January 2019, UNHCR officially registered around 1.2 million people of concern in Cameroon, including 256,100 CAR refugees, 136,399 Nigerian refugees, 24,875 urban refugees from Nigeria and CAR, 8,196 asylum seekers, 683,238 internally displaced persons, and 105,906 returnees (IDPs who have returned to their communities of origin).2

Some refugees from CAR have been displaced for over a decade, and the political and security situation in CAR has not improved sufficiently to warrant their return. Initially, refugees from CAR arrived slowly throughout the mid-2000s. Renewed violence in 2013 spurred a sudden flow of refugees across the border.3 While the rate of new arrivals from CAR decreased from 2014 to 2017,4 violence in CAR intensified in 2018, resulting in nearly 25,000 CAR refugees crossing into Cameroon that year.5

Fleeing violence and instability caused by Boko Haram, Nigerians began seeking refuge in Cameroon in 2012. In response, Cameroon established a camp in Minawao to accommodate up to 20,000 refugees,6 but the camp’s capacity was nearly exceeded by 2014. By the end of 2015, violence along the Cameroon-Nigeria border displaced more than 90,000 Cameroonian and refugees who had settled in these areas. Due to ongoing insecurity, many IDPs and refugees remain displaced; as of January 2019, Minawao camp hosts nearly 60,000 Nigerian refugees.7 Humanitarian response in the Far North began in earnest in 2015, but access near the Nigerian border remains limited due to insecurity, heavy rains and poor infrastructure.8

Although Boko Haram attacks have specifically targeted refugees and IDPs, some members of the Cameroonian government perceive Nigerian refugees as an economic and security threat.9 Reports document the forced returns of Nigerians by Cameroonian government officials since 2015; a Human Rights Watch report claims that over 100,000 Nigerians have been deported.10 Boko Haram’s tactics of infiltrating local communities and attacking civilian targets have created tensions and mistrust toward members of ethnic groups connected to Boko Haram in Nigeria.11 An attack on Maroua, the largest city in the Far North, in June 2015 led the government to impose more restrictive security measures, which limited refugees’ freedom of movement.

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7 The number of refugees in Minawao has ebbed and flowed since its establishment. In 2017 more than 60,000 were registered in Minawao. Some refugees returned to Nigeria in 2017 and 2019, and population dipped to approximately 50,000, but as of 2019 it again approached 60,000. Mbiyozo, “Cameroon’s Forceful Repatriation of Nigerian Refugees.”
8 Access differs across organizations. Some organizations which have a longer history of presence in the Far North face fewer constraints than others. In other cases, operational protocols limit the areas an organization can access without armed escort.
Figure 1. Displacement in Cameroon as of January 2019

Refugee policy in Cameroon

Cameroon is a signatory to the 1951 Refugee Convention and the 1967 African Union protocol. The government adopted a refugee law in 2005 (Law No. 2005/006), which entered into force in 2011. Together, these international and national regulations guarantee refugees freedom of movement, the right to work, free access to education and healthcare, and access to assistance from UNHCR. They also require authorities to register all asylum seekers and guarantee refugees the right not to be forcibly returned to their country of origin.

The government has recently made additional commitments to support refugees within its borders. At the 2016 Leaders’ Summit on Refugees and Migrants, Cameroon pledged to improve access to primary and higher education, strengthen the process of providing biometric ID cards, and facilitate voluntary returns for refugees. In March 2017, the government signed the Tripartite Agreement with the government of Nigeria and UNHCR outlining modalities of voluntary return of refugees to Nigeria. This agreement resulted from over two years of advocacy by UNHCR and the broader humanitarian community in Cameroon to curtail forced returns of Nigerian refugees. The tripartite commission, which oversees its implementation, first met in August 2017.

In addition, the government issued a Letter of Development Policy in August 2017, in which it requested financing from the IDA18 sub-window and articulated the government’s commitment to move toward a long-term strategic approach to forced displacement. The government committed to prepare a medium-term strategy to manage refugees, facilitating greater access to basic social services for vulnerable populations affected by forced displacement, improving legal security for refugees, issuing biometric and travel documents for refugees, and issuing birth certificates for children of refugees born in Cameroon.

Policy implementation

Although Cameroon has been lauded for its progressive refugee policies, there is a gulf between these commitments and legal arrangements, and practice on the ground. Policies where this gap is most prominent are those regarding registration and status determination—which have an impact on refugees’ access to quality education and decent jobs, and ultimately their ability to become self-reliant—as well as on forced returns.

Status determination and registration

Despite stated commitments to improving its status determination mechanism for refugees and asylum seekers, the process to determine status for refugees has been and remains unclear. The government only began to take ownership of the status determination process in Yaoundé in 2016; expanding this to other parts of the country has been discussed, but not yet implemented.

The government has committed to registering refugees and IDPs, but it has not yet taken ownership of this process either. Registration, when it occurs, is implemented by UNHCR. However, there is disparity in the implementation of the government’s registration policy between the North, East, and Adamawa, where CAR refugees are concentrated, and the Far North, where most Nigerian refugees are located.

CAR refugees living in camps and in host communities can register and be recognized as refugees, and have access to health and education services on the same basis as Cameroonian nationals in these areas. However, UNHCR has faced challenges registering Nigerian refugees due to government restrictions on refugee registration. Initially, the government limited registration to refugees living in Minawao camp and refugees

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coming through the nearby transit center, who were then placed in the already overcrowded camp.\(^\text{15}\)

More recently, there has been important progress in expanding access to registration in the Far North. UNHCR launched a joint initiative with the local government to begin biometric registration in the department of Logone and Chari in November 2018.\(^\text{16}\) This expansion of registration in the Far North is a promising development, resulting from extensive consultation and negotiation between UNHCR, the government, and humanitarian partners. However, refugees living outside of camps continue to face barriers to formal registration in the Far North. Even in the department of Logone and Chari, insufficient funding limits implementation, while logistical and security challenges mean operations may not last long.\(^\text{17}\)

Overall, the barriers out-of-camp refugees face in accessing registration constrain their ability to move freely; without identity cards they cannot pass through security checkpoints. This problem affects both out-of-camp refugees and IDPs who have lost access to their identity documents and have no way to prove their Cameroonian nationality.

**Forced returns**

Forced returns of Nigerian refugees continue in the Far North, in violation of policy commitments and international humanitarian law. This practice has not been reported for CAR refugees in the North, East, or Adamawa regions. Although the exact number of forced returns is unknown even to specialists, there is consensus that the volume of forced returns has decreased in recent years, especially since late 2017, around the time UNHCR made public statements criticizing the practice.\(^\text{18}\)

Nevertheless, public scrutiny has not put an end to forced returns at the Cameroon-Nigerian border, and the situation remains complex and fluid. In January 2019, UNHCR reported that over 9,000 refugees were forcibly returned to Nigeria after fleeing an attack on a Nigerian border town.\(^\text{19}\) UNHCR typically contacts local authorities when it hears of planned or recently enacted forced returns, but it has had limited success in intervening to stop them. Local authorities say they will look into it, but this has not led to sustained changes.

The drivers of forced returns are murky. It is not possible to state with confidence whether forced returns are a strategy disseminated from the central government or the result of disparate responses by local authorities. If these actions are not directly ordered by the central government, they are at least tolerated. Some ministries, such as the Ministry of External Relations for Cameroon (Ministère des Relations Extérieures du Cameroun [MINREX]), completely deny the occurrence of forced returns.\(^\text{20}\) Others, such as the Ministry of State, Minister of Territorial Administration and Decentralization (Ministère de l’Administration Territoriale et Décentralisation [MINADT]), have promised to investigate the practice, but have not yet produced tangible results.

**Cameroon’s refugee response structure**

Despite two decades of experience with forced displacement, coordination at the central government level for meeting displaced people’s needs remains disjointed.\(^\text{21}\) MINADT is the focal ministry for humanitarian affairs and plays a central role in the

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government’s management of refugees in rural areas through local government representatives, governors, or prefets and sous-prefets. However, refugee issues, including status determination, are managed separately by a technical secretariat within MINREX. The provision of identity documents for all residents of Cameroon, including refugees, is managed by a separate structure, the Directorate of National Security (Délégation Générale à la Sureté Nationale [DGSN]), a security body that reports directly to the president. Matters related to development, including all World Bank projects, are managed by yet another ministry, Ministry of Economy, Planning, and Territorial Administration (Ministère de l’Economie, de la Planification et de l’Amenagement du Territoire [MINEPAT]). Overall, it appears there is no clear institutional arrangement to manage a medium- or long-term response to forced displacement as responsibilities either overlap among or are lost between ministries.22

To implement their programs, humanitarian and development actors typically coordinate separately with their Cameroonian focal ministries and with sectoral ministries (e.g., Ministry of Education, Ministry of Health). The capacity and dynamism of these ministries varies substantially. NGOs working in both humanitarian and development sectors report fruitful coordination with local authorities and greater challenges coordinating at the central level.

World Bank involvement in forced displacement

The World Bank will be implementing four projects in Cameroon under the IDA18 sub-window, totaling $130 million. These four projects were the first projects under the sub-window to be approved by the World Bank Board of Directors on May 1, 2018.

Three of the four programs encompass additional financing for existing World Bank-funded projects in Adamawa, the North, the Far North, and the East. One newly approved program will target education in areas served by the three existing programs. These four programs are intended to provide an integrated approach to addressing key challenges facing refugees and host communities. The programs include: Community Development Program Support Project Response to Forced Displacement, Social Safety Nets Project, Health System Performance Reinforcement Project, and Education Reform Support Project. (See Annex for more details.)

The projects are intended be structured around five-year development plans created by commune planning committees. The existing development plans do not yet include refugees in population counts or needs assessments, and most commune planning committees do not yet have representation from refugee populations. However, funding from the IDA18 sub-window intends to leverage these existing local government structures and create incentives for them to include refugees in their planning.

Villages to benefit from the sub-window in the East, North, and Adamawa regions are being identified, with refugee burden among the selection criteria. Eighty-five villages, across 17 communes, each hosting at least 400 refugees will benefit from the IDA18 sub-window projects. A total of 6,800 refugees are expected to be reached.

UNHCR, the World Bank, and the government carried out a needs assessment in these 17 communes to develop targets. They are currently finalizing a document that establishes needs and what is necessary to meet them, called the plan de soutien (Support Plan). The plan de soutien was initially intended to meet 100 percent of needs, but the government asked to reduce the targets to the national average once they were made aware of the magnitude of needs.

UNHCR, with the support of the World Bank, has advocated for the completion of an analogous process to develop a plan de soutien for the Far North. This may be more difficult to implement as the commune-level development plan for this area has not been updated since 2014. Conducting a needs assessment will also be politically sensitive, as it will require the central government to acknowledge the presence of Nigerian refugees living outside of Minawao camp and the scale of internal displacement.

Decision-making around IDA18 RSW projects

The selection and negotiation of projects funded under the IDA18 sub-window resulted from a close consultation between UNHCR, the World Bank, and MINEPAT. Consultation was centralized and largely limited to representatives of these three actors.

According to both the World Bank and UNHCR, the selection of projects was pragmatic; expanding existing projects expedited approval processes within the World Bank. Negotiations among the World Bank, UNHCR, and the government remained largely uncontentious, with the exception of geographic targeting of the additional financing. The Government of Cameroon did not want to target specific areas; however, UNHCR successfully advocated targeting assistance to areas with the highest refugee hosting burden. Due to its longstanding relationship with the World Bank and other development actors, MINEPAT has advocated in favor of these projects within the central government.

UNHCR and the government have agreed to set up a Steering Committee and Technical Secretariat, with regional and commune level committees for

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23 The agreement between UNHCR and MINEPAT ended on 31 December 2017 and was not renewed, primarily because UNHCR is not an development actor not contributing with an important development budget.
implementation (see Figure 2). This agreement was signed in October 2016, but it is being renegotiated, and the coordinating structures may change due to recent reshuffling of ministerial authority.\textsuperscript{24} The coordination structure is meant to support the World Bank’s “integrated approach,” in which multiple programs are targeted in the same geographic areas using a unified results framework. Although a departure from the World Bank’s typical way of working, there is substantial support and enthusiasm within the Bank, particularly by staff in Washington, to take an integrated approach.

**Commitments to refugee protection**

Negotiating the terms of the Bank-funded projects provided an opportunity for UNHCR and the World Bank to secure explicit government commitments to refugee protection. The government articulated three commitments in its Letter of Development Policy, which requested the sub-window financing: 1) issuing biometric identity cards to refugees, 2) issuing birth certificates for children of refugees born in Cameroon, and 3) strengthening the capacity of the Technical Secretariat to register asylum seekers and make decisions on refugee status.\textsuperscript{25} Although consistent with existing legal frameworks, these explicit commitments would likely be absent if the World Bank and UNHCR representatives had not pushed for them.

The World Bank Board of Directors approved all four projects in May 2018. However, the approval process proved more difficult than expected. Several weeks before the board meeting, in April 2018, UNHCR published a statement calling attention to the continued occurrence of forced returns of Nigerian refugees.\textsuperscript{26} Verification of a sufficient protection environment is one of three key eligibility requirements for the IDA18 sub-window.

At the request of the World Bank, UNHCR assessed the adequacy of the refugee protection framework and attested to its adequacy. UNHCR committed to monitoring protection for the duration of the sub-window projects. The agency will provide updates to the World Bank when protection incidents occur and issue semiannual reports to the Bank and to MINEPAT. UNHCR, in consultation with the government and World Bank, identified key protection indicators on which these reports will be based.


\textsuperscript{24} MINEPAT’s authority over commune-level development spending was recently reduced and transferred to a new ministry, Ministere de la Development (MINDEVEL).


Challenges of development solutions for the refugee crisis

Cameroon is among the first countries to receive financing through the IDA18 refugee sub-window. Although Bank-funded projects were quickly approved by the World Bank board, the pace of progress is relatively slow. Cameroon has progressive refugee policies, but implementation in practice has fallen short; accountability mechanisms appear insufficient to ensure best practices are employed; and NGOs, civil society and affected populations have been largely left out of the decision-making process around policies and programs. This section outlines challenges and constraints to the current response effort, and areas where all actors responding to the crisis can improve their strategy and actions.

Disconnect between policy and action

Although all refugees in Cameroon have robust legal protections, these policies are implemented unevenly. Encouragingly, the government has delivered on many of its promises in the East, North, and Adamaoua regions. However, the government’s stance toward out-of-camp refugees and other displaced persons is inconsistent in the Northwest, Southwest, and parts of the Far North. Some government officials continue to forcibly return Nigerian refugees, in direct violation of the government’s commitment to ensuring safe and voluntary returns in the Tripartite Agreement.

Similarly, violence by government security forces that has contributed to the displacement of hundreds of thousands of Cameroonians can only be seen as a failure to provide sufficient protection. The choice to pursue predominantly military solutions to combat Boko Haram and separatists in the North West and South West has resulted in a relative under-investment in social services in these areas. The government has not invested its own resources in implementing its policy commitments to improve access to basic services for refugees and host communities.

Accountability

The projects funded by the IDA18 refugee sub-window represent an attempt to create incentives for governments to invest in the development of long-neglected areas. While humanitarians lack clear mechanisms to hold governments accountable to their own policy commitments, the conditionality of the IDA18 sub-window financing could provide leverage to encourage the government to live up to its protection commitments.

Successfully leveraging the sub-window requires the World Bank work with UNHCR and other partners to clearly define the condition of “a sufficient protection framework” and for the World Bank to be willing to hold funding until this condition is met. Indeed, the World Bank has already indicated its willingness to do this, and has delayed the sign-off on and paused project agreements in response to reports of forced returns. This may strain relationships and directly challenge the government, conflicting with the World Bank’s traditional approach of implementing programs in close cooperation with its government partners.

If the government does not perceive the threat of withdrawing or holding-up financing as credible, it has little to lose by neglecting its commitments to protect and improve the lives of refugees, host communities and others affected by displacement.

If the World Bank does not clearly define the condition or does not withdraw funding upon violation, it would fail to live up to the innovative promise of the sub-window. In such circumstances, continuing to provide financing directly to the government could produce unintended consequences; if the government anticipates donors like the World Bank will continue to fund social services, even in the absence of a sufficient protection environment, the government will likely continue to underinvest in social services for vulnerable populations in favor of its preferred security-first approach.

Additionally, since 2017, government security forces have perpetrated violence against civilians and contributed to the displacement of over 360,000 IDPs.
in the Northwest and Southwest regions. These areas and populations are not intended beneficiaries of projects funded by the IDA18 sub-window, but the World Bank should decide if the condition of maintaining a sufficient protection framework is violated by government security forces engaging in violence against civilians that results in displacement.

**Selection and design of World Bank sub-window projects**

There is broad consensus that the World Bank and UNHCR suggested appropriate geographic areas for a development-led approach. However, many aspects of the sub-window projects, including the justification for project selection, the implementation timeline and the methods of coordination, remain opaque to humanitarian actors. In addition, it is unclear if or how the World Bank is adapting its projects to best serve and meet the unique needs of refugees and others living in refugee-hosting areas.

Some donors, NGOs, and representatives of other UN agencies have criticized the World Bank and UNHCR for failing to consult more broadly on project development, while some humanitarians have adopted a wait-and-see approach to supporting or criticizing the World Bank. Those involved with the decision-making process have noted, however, that broader consultation could have delayed the project approval and design process. For humanitarians, the largest source of uncertainty is a lack of concrete information about project implementation, and what it means for existing projects with overlapping sectors and implementation areas.

Notably, the World Bank and UNHCR leveraged the consultation process to secure commitments to serve refugee protections, but the sub-window does not provide substantial financing to implement these commitments. For example, the health project includes $4 million for civil registration, but it is not clear how these funds will be used specifically to assist refugee populations to access documentation that would facilitate their freedom of movement and access to government services.

**Humanitarian-development consensus on principles but not implementation**

Humanitarian and development actors in Cameroon welcome donors' shift to an integrated approach to addressing forced displacement, which addresses structural development challenges and serves all members of vulnerable populations—including refugees and host communities. However, there has not been a clear coordination framework to enable implementation of an integrated approach.

Both World Bank and humanitarian actors emphasize that success will depend on coordination among themselves and with local government actors, but the formal mechanisms through which this coordination will occur needs to be concretized. Bank representatives acknowledged that implementation would likely be slow, and cautioned that failure to coordinate with humanitarian actors would undermine their ability to implement with local ownership.

One remaining question is the level at which coordination must occur. World Bank documentation proposes coordinating mechanisms at the national and regional levels; humanitarian coordination mechanisms also exist at these levels. However, the World Bank’s four programs will be implemented at the commune level, where few coordination mechanisms currently exist.

**Implementation approach**

There is broad concern – including within the World Bank and UNHCR – about the capacity of the government to implement projects effectively. Projects funded by the sub-window will be implemented according to existing IDA18 infrastructure, which relies entirely on implementation by government, led by PNDP, with support from line ministries. Three problems could arise from this approach.

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28 Humanitarians voice frustrations that the Bank does not attend its numerous coordination meetings, whereas Bank representatives critique humanitarians for failing to engage the government in coordination.

29 For example, if they are trying to implement health clinics that require investment and humanitarians offer to open a clinic which provides services for free, local authorities have no incentive to engage in the longer, more costly process.

30 Although it was created in 2004 during the first phase of the project, it still depends on the World Bank for financing and direction. The weakness of the agency was raised by many interviewees in both humanitarian and development roles.
First, the World Bank will monitor implementation by the PNDP from Yaoundé; however, if the project targets local governments (commune councils) and is implemented by the national government (PNDP), there is no obvious accountability mechanism that refugees—who reside outside the traditional state-citizen relationship—and IDPs can easily access.

Second, there is currently no built-in consultation with humanitarian organizations working at the local level. The needs of refugees, IDPs, and other persons of concern differ in important ways from host communities. NGOs and civil society organizations have a critical role to play in helping ensure these unique needs are met from both a policy and programmatic perspective. Humanitarian NGOs can also support the Bank by providing guidance on how to best adhere to humanitarian principles. While consultation at the national level is a good place to start, not all organizations are represented in Yaoundé and those in the capital may lack granular knowledge of local dynamics that could affect implementation. Improving consultation will require both the World Bank and NGOs to agree to meaningfully coordinate and engage with one another.

Third, the decision to implement wholly through the government could result in the exclusion of the most vulnerable—those whose existence the government does not acknowledge. It took time for the government to acknowledge that a humanitarian situation exists, and some government actors continue to deny the presence and scale of internal displacement and out-of-camp refugees in some parts of the Far North. For Bank programs to reach these individuals, the government will need to acknowledge them, include them in needs assessments, and deliver services to them. If the government is solely responsible, it is unlikely these groups will be counted and served.

**Measurement and indicators of success**

Several of the program’s development objective indicators—the main way the Bank evaluates the outcomes and success of its projects—do not appear to be sufficiently tailored to measure impacts for both host communities and refugees. While the Community Development Program Support and Social Safety Nets projects disaggregates a handful of indicators by status and gender, just one indicator for the Health System Performance Reinforcement project and none of the Education Reform Support Project indicators mention refugees. Furthermore, the indicators that state they will include refugees tend to measure activities, not outcomes. For example, the Social Safety Nets project measures the number of refugee households receiving cash, rather than the number of refugees who have increased their income or consumption, and the Health System Performance Reinforcement project measures the number of refugees who have received healthcare at facilities in refugee-hosting regions, rather than mortality or infection rates. While inclusion and access are important to measure, it is important to include refugees in outcome measures to determine if projects are having an impact on people’s lives.

**Refugee inclusion in commune planning**

The success of all four projects depends in large part on decisions made by commune-level planning committees. However, only a few displaced people have been involved in commune level planning, and it is presently unclear how refugees and their needs will be integrated into these processes. Some local leaders contend that the commune council and its development plans should only benefit Cameroonian. If this status quo continues, displaced people could be excluded from programs intended to benefit them, which could increase their vulnerability as humanitarian aid dwindles.

**Disjointed and opaque central government decision-making**

There is no single ministry or agency within government with a clear mandate to oversee all aspects of policy related to forced displacement. This creates inefficiencies in both policy-making and implementation as buy-in from multiple ministries is needed to make reforms happen. It is hard for to know where directives come from within the government or to whom one can or should appeal. In addition, policies are not always transparently communicated. For example, one interviewee with knowledge of government negotiations on the RSW programs said the government limit the percentage of refugee beneficiaries to around 8 percent of all beneficiaries. However, because this is not an official or written policy, it is difficult to contest.

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Recommendations

Development-led approaches to the forced displacement crisis in Cameroon are promising. World Bank-funded projects could make significant improvements in the lives of refugees and host communities and support Cameroon's progress towards the Sustainable Development Goals. To achieve this, existing policies, programs and coordinating structures require changes. Importantly, lessons learned in and recommendations for Cameroon could have meaningful relevance in other refugee contexts.

The **Government of Cameroon** should:

1. Create a new office and appoint a focal point for the government’s response to forced displacement to strengthen coordination between ministries and agencies and with non-government partners.
2. Include refugees in national development plans, and measure progress of refugee populations towards the SDGs in its voluntary national reviews.
3. Create a task force of relevant government agencies and ministries and development and humanitarian partners to support implementation and provide oversight of policies and programs.
4. Increase the capacity of the National Bureau of Civil Status (BUNEC) to provide birth certificates to children of refugees born in Cameroon by opening and staffing new offices in refugee hosting areas.

The **World Bank** should:

5. Develop a set of outcomes, in collaboration with government and NGO partners and aligned to Cameroon’s development plans, to be achieved with RSW financing and adjust Program Development Objective indicators to measure program benefits and outcomes among host communities, refugees and IDPs. Indicator data can support inclusion of these populations in Cameroon’s SDG voluntary national review.
6. Clearly define and make public a sufficient refugee protection framework, which includes how the Bank will assess whether the government is implementing the framework and what measures the Bank will take if the framework conditions are not met.
7. Standardize consultation with non-governmental actors on RSW policy and program decisions. This should include consultation with humanitarian actors and refugees on design and implementation of projects. It could be done through existing humanitarian forums (e.g., Humanitarian Country Team meetings).
8. Enhance the information campaign to sensitize refugees about their opportunities to participate in commune-level planning, and fully implement the grievance mechanism for reporting complaints at the commune level that refugees and IDPs can access.

**Humanitarian and development actors:**

9. UNHCR should help facilitate a more robust consultation process for Bank-funded projects, and share reports on protection monitoring produced for the RSW projects with the humanitarian community.
10. Donors should increase their multiyear financing for refugee response in Cameroon, in alignment and with World Bank efforts to invest in longer-term solutions.
11. Willing NGOs—particularly those with expertise in protracted displacement contexts—need to coordinate with development actors.
Annex: World Bank RSW-funded projects

As of March 2019, the World Bank was funding four projects to support refugees and host communities in Cameroon.

**Community Development Program Support Project Response to Forced Displacement (CDPSP)**

The Bank’s Community Development Program Support Project Response to Forced Displacement (CDPSP) is a long-running project intended to improve delivery of social services, strengthen the ongoing decentralization process, and boost local governments’ capacity to plan for and finance their nationally-mandated activities. Two phases of this project have been implemented since 2004 and it is anticipated to run through 2022.

The main focus of intervention has been at the commune level, with the creation and support of commune level planning committees. During the project’s first phase (2004-2009), Programme National de Dévelopement Participatif (PNDP) was established within MINEPAT; classrooms were built, and textbooks were provided to students; hospitals were built and rehabilitated; water points were developed; and roads were rehabilitated. The second phase (2010-2016) expanded these activities to a larger number of communes, assisted them in creating five-year Communal Development Plans, and provided grants to finance activities under these plans. The impending third phase aims to improve the financial management by communes already being supported by the project.

The IDA18 replenishment provides additional financing in the form of an $8 million loan and a $40 million grant from the refugee sub-window. In areas affected by displacement, the objective of the additional IDA18 sub-window financing is to support the integration of displaced people into the commune level planning process. These commune-level committees will also oversee the implementation of the other projects implemented under IDA18.

**Social Safety Nets Project (SSNP)**

The latest World Bank data reports 37.5 percent of Cameroonians fall below the poverty line; the absolute number of poor people in Cameroon is 8.1 million. These rates are higher in the three of the regions of intervention: Far North (74.3 percent), North (67.9 percent) Adamawa (47.1 percent). The poverty rate among refugees is even higher; 96 percent of CAR refugees in the East, Adamawa, and North regions fall below the extreme poverty line.

To tackle these high poverty rates, the Bank is implementing the Social Safety Nets Project (SSNP), which aims to create a national safety net system, including piloting cash transfers and public works programs targeting the most vulnerable people in rollout areas. To date the program has developed targeting and payment systems for cash transfers, emergency cash transfers, and cash-for-work programs. The government implemented emergency cash transfers in response to the influx of refugees and IDPs in the Far North. Cash transfers are intended to facilitate income generating activities, such as raising livestock and agriculture. An evaluation of the pilot program found cash transfers improved beneficiaries’ access to government services, including education, health services, and civil registration. Beneficiaries invested in income-

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generating activities, most frequently agricultural inputs (e.g., fertilizer, livestock vaccinations).

The original project was financed by a $50 million IDA loan. Additional financing, including a $30 million IDA loan and a $30 grant from the sub-window will extend the coverage of existing activities through 2022 to vulnerable populations in refugee-hosting areas.

Health System Performance Reinforcement Project (HSPRP)

Cameroon’s National average rate of maternal mortality (782 deaths per 100,000 live births) and child mortality (103 deaths per 1,000 live births) exceed peer countries like Uganda.38 Access to care and health outcomes are poorer in underserved regions.39 Malnutrition rates illustrate these dynamics: nationally 32 percent of children are stunted, with higher rates in the Far North (44 percent), North (40 percent), Adamawa (40 percent), and East (38 percent).40 Refugees face a higher disease burden compared to their hosts. The most prevalent diseases are upper respiratory tract infections, malaria, intestinal worms, and diarrheal diseases. Contributing to these health issues is lack of access to potable water—only 28 percent of refugees living in the North, East, and Adamawa regions have access.41

In December 2016, the Bank’s board approved the Health System Performance Reinforcement Project (HSPRP) to increase access and quality of health services, with a focus on reproductive, maternal, child and adolescent health and nutrition services.42 As of writing, the project had already reached 100 percent coverage of districts in the North, East, and Adamawa regions and 41 percent coverage in the Far North.

The existing project is funded by $100 million loan and $27 million grant. Additional financing from a $6 million loan and a $30 million grant from the IDA18 refugee sub-window supports the expansion of this project to include refugees and to geographically cover the entire country. It also devotes $4 million to strengthen civil registration by supporting the recently created National Bureau of Civil Status (Bureau National de l’Etat Civil, or BUNC), which is intended to coordinate interventions from different ministries related to civil registration, including birth certificates, marriage licenses, and death certificates.43

Education Reform Support Project (ESRP)

The government’s current education system strategy, drafted before the height of the displacement crisis, does not address the needs of refugees or IDPs and has not been updated to do so.44 The government has stated its commitment to ensuring refugees’ access to host community public schools, but this has not yet been implemented.45 There are large regional disparities in school enrollment in Cameroon. The national enrollment rate in secondary education is 50.4 percent for girls and 55 percent for boys, but these numbers are much lower in the Far North (16.2 percent for girls; 31.8 percent for boys) and North (18.4 percent for girls; 36.2 percent for boys).46

In the Far North, 92 preschools and primary schools remain closed due to insecurity, and 23,000 children— including refugees, IDPs, and host communities— are not in school.47 Non-state armed groups have called for a ban on government run schools, attack schools, and threaten those who violate their boycott.48 Donors and NGOs that provide education to refugees focus predominantly on access within refugee camps.

39 Child mortality rates in the North and Far North regions are 173 deaths and 154 deaths per 1,000 live births, respectively. World Bank, 15.
45 Interview with NGO representative, Yaoundé.
Schools operate in the Far North’s Minawao camp, but many children do not attend; instead, they work to help provide basic needs for their families. In 2017, approximately 16,000 children were enrolled in schools in Minawao camp, but in 2018 just 7,000 were enrolled. This drop in enrollment was primarily because many parents stopped sending their children to school in anticipation of returning home after the Tripartite Agreement was signed and voluntary return appeared possible.\(^{49}\)

Aligned with Cameroon’s commitments at the Leaders’ Summit, the government and Bank are implementing a new education project, the Education Reform Support Project (ESRP), which aims to improve equitable access to quality basic education in disadvantaged areas.\(^{50}\) The project is funded by a $100 million loan, supplemented by a $30 million grant from the IDA18 sub-window. These disadvantaged places include refugee-hosting areas, including the Far North, North, Adamawa, and East regions. At least 300 schools serving 20,000 refugee children are expected to be supported by this project. The project will train primary and pre-primary teachers in a new curriculum, provide textbooks to primary schools, and send government-recruited teachers to primary schools where more capacity is needed.

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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 million who are uprooted and struggling to endure. The IRC leads the way from harm to home.