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Evaluation of the Implementation of the Global Compact on Refugees and its Comprehensive Refugee Response Framework (CRRF) in Uganda

Evaluation Report

March 2022
CRRF Evaluation Team

About IMPACT

IMPACT Initiatives is a Geneva based think-and-do-tank, created in 2010. IMPACT is a member of the ACTED Group. IMPACT's teams implement assessment, monitoring & evaluation and organisational capacity-building programmes in direct partnership with aid actors or through its inter-agency initiatives, REACH and AGORA. Headquartered in Geneva, IMPACT has an established field presence in over 25 countries. IMPACT's team is composed of over 300 staff, including 180 international experts, as well as a roster of consultants, who are currently implementing over 90 projects across Africa, Middle East and North Africa, Central and South-East Asia, and Eastern Europe.

SUMMARY

Uganda's refugee policy framework has long been recognised as highly progressive and inclusive, maintaining an open-door policy to people fleeing conflict and persecution, a non-encampment settlement approach, and offering refugees freedom of movement, the right to work, own property, and access to national services such as health and education. In 2016, the New York Declaration for Refugees and Migrants and its Comprehensive Refugee Response Framework (CRRF) effectively affirmed Uganda's long-standing refugee model; however, it coincided with unprecedented refugee inflows into Uganda, primarily from South Sudan, the Democratic Republic of Congo (DRC) and Burundi, challenging Uganda's refugee model, and leading it to formally adopt the CRRF in March 2017, one of first countries to do so. The Ugandan CRRF is built on the following five core pillars: Admission and rights (Pillar 1); Emergency response and ongoing needs (Pillar 2); Resilience and self-reliance (Pillar 3); Expanded solutions (Pillar 4); and Voluntary repatriation (Pillar 5).

Uganda now hosts the largest refugee population in Africa, and the third largest in the world. As of 31 January 2022, Uganda was hosting over 1.5 million refugees, of whom more than 950,000 were from South Sudan, more than 450,000 from DRC, and almost 50,000 from Burundi, with the rest largely from Somalia and Rwanda.[1] Almost all (93%) are hosted across 13 formal refugee settlements in 12 districts in the West Nile and South West regions of the country,[2] and with a minority living in Kampala, and an unknown number living in secondary cities.

The New York Declaration recognised that traditional humanitarian assistance, focused on refugee camps with dedicated services and limited rights to move and work, were no longer sufficient to address the increasing scale and protracted nature of refugee crises. It proposed a new approach aimed at addressing the drivers and root causes of large-scale movements of refugees, as well as improving the self-reliance and resilience of refugees and their host communities; it also called for more equitable international responsibility towards the protection of refugees, and predictable support for their host countries. The New York Declaration introduced the CRRF as a vehicle to achieve these objectives, and proposed a Global Compact on Refugees (GCR). The GCR, eventually endorsed in December 2018, incorporated, and built upon, the CRRF's objectives; namely easing pressures on host countries, enhancing refugee self-reliance, expanding access to third country solutions, and supporting conditions in countries of origin for return in safety and dignity.

In 2020, the CRRF Steering Group in Uganda took the decision to evaluate the implementation of the CRRF. As a result, this report evaluates the implementation of the GCR and the CRRF in Uganda. The specific objectives of the evaluation, as set out in the Terms of Reference (ToR) of Uganda's CRRF Steering Group, are:

1. To analyse the CRRF's policy, institutional, organisational, financial, and technical dimensions and processes with respect to the CRRF's ability to achieve the outcomes and deliverables of the CRRF and objectives of the GCR.
2. To assess the results delivered across refugees and host communities, in order to determine the added value of the CRRF and how the refugee response has been shaped in Uganda.
3. To provide recommendations to inform the vision, strategy, planning, and implementation of the CRRF.

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[1] UNHCR & GoU (n.d.) Uganda Comprehensive Refugee Response Portal [website, visited March 2022], available here.
[2] Ibid.

To assess these objectives, the evaluation draws on secondary data analysis and qualitative methods. Primary data was collected through interviews with 99 key informants (KIs) from key government institutions, partner organisations and other stakeholders at the national, sub-national and district level, as well as experts outside Uganda, and 14 focus group discussions (FGDs) in 8 refugee hosting districts (RHDs) between November 2021 and January 2022.

General findings and recommendations

The evaluation concludes that there has been remarkable progress in the implementation of the CRRF in Uganda, in particular when compared to other countries. The Ugandan government has demonstrated continued commitment to the objectives of the CRRF and GCR through the ongoing allocation of land and other resources, and the maintenance of a progressive policy environment that provides freedom of movement and the right to work. Despite the impact of the COVID-19 pandemic, the roll-out of the CRRF in Uganda has continued, albeit at a slower pace.

The CRRF approach has been successful in engaging and bringing together a wide range of stakeholders that had not previously been involved in the refugee response; this can be considered a major outcome. The Government of Uganda leads the application of the CRRF through the Office of the Prime Minister (OPM) and its Department of Refugees (DoR), together with the Ministry of Local Government (MoLG). In accordance with the 1951 Refugee Convention and the 2016 New York Declaration, United Nations High Commissioner for Refugees (UNHCR) is the lead UN agency supporting the government in this. Bilateral and multilateral donors, as well as development agencies, are actively supporting the implementation of the CRRF in Uganda, through both humanitarian and development channels, allocating funding to the response – both to refugees and host communities in refugee-hosting districts (RHDs) – and enabling the transition from humanitarian interventions towards a longer-term development response, under a nexus approach.

In the context of the CRRF, specific policies and plans have been developed and new institutions established, including the National Action Plans (NAPs), a Strategic Direction (SD), Sector Response Plans (SRPs), and a CRRF Steering Group and Secretariat, each of which are discussed in more detail below. However, as the CRRF moves towards full implementation of the new plans and policies, there is a need to revisit, refine, and re-calibrate the existing systems and practices. The evaluation has identified several challenges and shortfalls in the implementation of the CRRF in Uganda, which need to be addressed in this new 'implementation' phase.

As part of the adaptation of CRRF systems and practices in the current phase of CRRF implementation, the Steering Group should review the Strategic Direction and the NAP: this would entail a review of the ToR of the Steering Group and Secretariat, improved alignment with the broader policy and coordination processes, and clarity on the definition and scope of the CRRF. More specific recommendations and suggested adaptations to the institutional structures and implementation strategies of the CRRF in Uganda have been elaborated and set out below; these are intended to build on the solid work and achievements which have already been attained, and to nurture further progress towards the overall objectives of the CRRF. A more detailed set of recommendations is presented in Section V, Recommendations.

If Uganda is to maintain its reputation as a global standard-bearer for the application of the CRRF, both the government and its international partners need to demonstrate their continued commitment to its implementation in Uganda, and their accountability to refugee populations and host communities. The international donor community, both humanitarian and development partners, should continue to invest in the implementation of the CRRF in Uganda, sustaining their joint efforts in the overall refugee response, and increasing their financial contributions, particularly against the Sector Response Plans and in support of government-led service delivery. The government should instill a more robust and inclusive "whole-of-government" approach to addressing the refugee crisis, and maintain attention and financial and human resources to the CRRF institutions (notably to the Secretariat, the SRP

Secretariats, and the Refugee Engagement Forum), to enhance their sustainability and increase government ownership.

Planning and policy processes

To implement the CRRF, policies and plans have been developed and promulgated, notably five costed Sector Response Plans – covering Education, Health, Water & Environment, Jobs & Livelihoods, and Sustainable Energy, which was recently endorsed. These plans have been spearheaded by their respective line ministries and integrate development approaches. As such, they have been instrumental in attracting the attention and engagement of line ministries and development actors. The CRRF Secretariat has developed two consecutive NAPs (2018-2020 and 2021-2022), as well as a Strategic Direction (2021-2025). The Strategic Direction and latest NAP foresee an increased focus on deliverables and sustainable outcomes under the CRRF; and focus on strengthening national arrangements, enhancing stakeholder engagement and coordination at district level, mainstreaming the CRRF into national planning to address the long-term impacts of hosting refugees, fostering regional partnerships, and ensuring international burden-, and responsibility-sharing.

Refugee management has been formally integrated into Uganda's National Development Plans 2 (2015/16-2019/20) and 3 (2020/21-2024/25), establishing the foundation for a comprehensive response that addresses the needs of both refugees and Ugandans living in RHDs through a lens of self-reliance, involving government ministries and development actors.

While the development of CRRF-specific plans such as the NAPs and SRPs has been widely appreciated, findings suggest that there remains a lack of clarity and coherent vision as to how to better align these with the programmatic (rather than sector-based) approach of NDP 3, as well as the District Development Plans (DDPs) and the 'broader vision' and results framework of the CRRF embedded in the Strategic Direction and NAP. In addition, there is a lack of alignment between the different SRPs, even though they sometimes cover the same issues. To promote this broader vision, the CRRF Steering Group and Secretariat, in coordination with Ministries, Departments and Agencies (MDAs), and in particular the National Planning Authority (NPA), should promote better coherence between these different CRRF-specific policies and plans, and their alignment to national-level policies and plans.

Given concerns, raised by KIs and FGD participants, that basic emergency standards and quality of service delivery are not being met, and given that the SRPs do not cover all humanitarian sectors, the RRP remains relevant, and will continue to be so. While efforts are made to align the SRPs with the RRP, there appears to be a lack of consensus on the extent to which humanitarian needs should be incorporated into the SRPs. Therefore, the CRRF Secretariat, together with the humanitarian and development community, should ensure the alignment of, and clarify the respective roles and responsibilities between, the humanitarian Refugee Response Plan (RRP) and the different SRPs, to ensure that both humanitarian and development needs are properly covered under CRRF Pillars 1 (Admission and rights) and 2 (Emergency response and ongoing needs).

The evaluation revealed several policy areas that require clarification or further development. Most of these policy initiatives have been launched and included in different planning frameworks but remain to be fully developed, adopted, and institutionalised. These include:

- The Refugee Policy and the East African Community's Refugee Response Plan, which were referred to in the NAP 2021-2022's Annual Workplan. The CRRF Steering Group should provide clarity on progress towards these documents.

- A Settlement Strategy, to better streamline and standardise the establishment and management of refugee settlements under a common approach.

- A Comprehensive Transition Strategy and guidelines for the handover of essential service provision and facilities to government ownership, including commitments to predictable and sustained funding and other technical support from international donors, in line with the concept of international burden-sharing.

- A Private Sector Engagement Strategy, to enhance the involvement of the private sector in refugee-hosting districts, which would enhance the sustainability of the response.

- A Localisation Strategy, strengthening the role of local and national assistance providers in the refugee response.

- A National Engagement Strategy, aimed at improved awareness and buy-in of CRRF stakeholders, and inter-institutional relationships and coordination. This should embed a Resource Mobilisation strategy and a new CRRF Communications & Outreach Strategy, aimed at promoting genuine two-way engagement with and between all key stakeholder groups.

While the CRRF incorporates the needs of host communities across the different RHDs, there are certain geographic areas which's coverage needs clarification. These include refugee-hosting areas outside the formal RHDs, notably transit districts and secondary cities. Additionally, while there is a government definition of host communities, which includes the whole population of the RHD, findings suggest that there remains a differential approach to targeting host populations in plans and programmes. In light of this, the CRRF Steering Group is recommended to specify the geographic scope of the CRRF, addressing transit districts and urban centres, and host community targeting according to a needs-, and vulnerability-based approach. A degree of flexibility will be required, considering the sectoral specificities of different sectors.

Coordination mechanisms

While coordination of the overall refugee response has undoubtedly improved under the CRRF, there is now a plethora of coordination mechanisms associated to the multiple policy processes. Some of these are specific to individual stakeholder groups, such as the Local Development Partners' CRRF sub-group; others bring together a diversity of actors, such as the Refugee Humanitarian Partners Group (RHPG), Sector Working Groups, SRP-related meetings, national-level Working Groups on the NDP 3, and CRRF Steering Group meetings – all of which was found to limit the efficient use of time and human resources. The CRRF Secretariat should work together with MDAs and the International Community to prioritise, rationalise, and develop better efficiencies between the different coordination fora, working groups and meetings, and ensure their realignment towards NDP 3.

The evaluation has highlighted that there is a lack of consensus of the respective roles of humanitarian and development actors, in particular related to the role of humanitarian actors in the provision of livelihoods support under Pillar 3. While livelihoods remain under-funded, in particular compared to the needs outlined in the RRP and the Jobs & Livelihoods SRP, humanitarian actors should stay engaged in livelihoods support, with a particular focus on income-generating activities, and in close coordination with, and learning from, development actors and, where possible, the private sector.

District-level KIs and FGD participants highlighted that there is limited understanding of the CRRF at the sub-national level; and yet, this is where the plans and policies developed by the CRRF are ultimately being implemented and materialised to address the needs of vulnerable

refugees and host communities. Therefore, the Ugandan government, supported by the CRRF Secretariat, should develop and ensure better alignment between the national and district level. In particular, there should be greater awareness-raising about the CRRF at district level and the contextualisation of available plans, policies and processes to ensure their relevance and implementation in RHDs. Efforts should also be made to enhance the representation of District Local Governments (DLGs) and lower tiers of government at national level, and increase their involvement in decision-making processes, including on financial allocations from the central government to local authorities. This will be facilitated through the elaboration of the National Engagement Strategy (see above), and the establishment of the District Engagement Forum (see below).

In addition, despite the creation of the Refugee Engagement Forum (REF) (see below), there continue to be concerns at both national and district level that refugee and host community voices are not sufficiently considered in decision-making. Furthermore, certain vulnerable groups within these communities do not seem sufficiently represented, including youth and persons with a disability. Similarly, while national and local NGOs are formally represented through the National NGO Forum, KIs raised concerns that NGOs are not sufficiently empowered. Therefore, efforts should be made to enhance the representation of these different stakeholder groups in national and sub-national coordination mechanisms.

CRRF Institutions

The adoption of the CRRF has also led to the establishment of innovative, representative, and nominally inclusive support and coordination structures, notably the CRRF Steering Group, the CRRF Secretariat, the Refugee Engagement Forum (REF) and the proposed District Engagement Forum (DEF).

The Steering Group is the main decision-making body for the implementation of the CRRF in Uganda and the key national institution for the engagement and coordination of different stakeholder groups. It is widely appreciated as a unique, high-level, and inclusive forum, in principle providing space for a broad range of stakeholders, aimed at encouraging a sense of joint ownership and common vision, harmonising approaches across sectors and actors, and promoting overall alignment of government, development, and humanitarian interventions at both national and district level.

The CRRF Secretariat has played a crucial role in the development and roll-out of the CRRF in Uganda, pursuing coherence across the different components to ensure a more robust comprehensive response in the RHDs. Findings suggest the Secretariat has developed strong convening power, bringing together different stakeholders through highly consultative and inclusive processes, supporting the Steering Group, and ensuring momentum between its meetings, driving the development of the SRPs, and developing the NAPs and Strategic Direction 2021-2025.

At national level, refugee leaders from each settlement are brought together in the Refugee Engagement Forum, an innovative and highly progressive initiative, whose participation in the CRRF Steering Group is widely lauded. This participation in a high-level decision-making body is possibly unique to Uganda. A District Engagement Forum has been initiated, aiming to enhance the representation of district-level and host community issues at the Steering Group, and to provide a platform for the exchange of challenges, good practices and lessons learnt among District Local Governments from the different RHDs

Nevertheless, the respective roles and specific ToR of these different institutions, particularly the Steering Group and the Secretariat, need to be re-calibrated and communicated. Findings suggest a lack of clarity and consensus regarding the Secretariat's legal status, including its role vis-à-vis the OPM DoR, at both national and district level. As the CRRF increasingly

focuses on the implementation and operationalisation of what has already been developed, a revised and more comprehensive ToR should be elaborated for the Secretariat, clarifying its mandate, and detailing clear tasks and responsibilities, clear hierarchies and clear reporting or coordination lines to OPM, line ministries and other MDAs. The ToR should also provide for a clearly mandated, dedicated leadership, including a director position that is 100% time-dedicated to the position. The legal positioning and housing of the CRRF Secretariat in the government's system also needs to be clarified, formalised, and communicated.

As the function, mandate, and responsibilities of the CRRF Secretariat evolve, and given funding shortfalls to cover positions in the secretariat, its structure will need to be re-calibrated and the skillset of its staff members adapted, dedicated 100% to newly assigned roles. In this context, the Secretariat should focus more on the alignment of plans, policies, and (financial) reporting and M&E systems, as well as the creation of cross-cutting guidelines, resource mobilisation, and support to MDAs and DLGs in the implementation of the developed plans and policies. Given resource constraints, the Secretariat could combine certain staff functions and develop their individual ToRs accordingly.

According to KIs, there currently is limited space for strategic discussions at the Steering Group meetings, due to long presentations and the inclusion of technical issues on the agenda. Therefore, Steering Group meetings need to be more strategic, allowing for high-level decision-making, which requires sufficient preparation time before the meetings and the clearance of technical issues by the Secretariat with the involvement of relevant stakeholders. Attention needs to be given to ensuring an appropriate level of participation and balanced and consistent representation of all stakeholder groups at the Steering Group meetings.

While the inclusion of refugee voices at the CRRF Steering Group through the REF was considered a success by KIs, REF members were not always given sufficient time and space to raise and discuss their concerns. Therefore, particular focus should be applied on providing more time and space to refugee and host community voices (through the REF and District Engagement Forum representatives). In addition, in line with efforts to galvanise private sector engagement, e.g. through the development of the Private Sector Engagement Plan, it will be important to better engage the Private Sector Foundation of Uganda (PFSU) at the Steering Group. Finally, to ensure a transparent and effective follow-up of Steering Group meetings, a mechanism needs to be developed to allow systematic monitoring and implementation on recommendations and decisions adopted by the Steering Group.

While REF members are participating in the Steering Group, they are often not present at other coordination forums. While this is likely the result of the REF having been specifically designed for the Steering Group, the structure of the REF, allowing for a democratic representation of refugee voices, holds a potential that goes beyond the Steering Group. Therefore, efforts should be made to increase REF participation in such coordination platforms and with bilateral partners, as well as at district-level and in the development of DDPs, to ensure that refugee voices are mainstreamed throughout all key decision-making processes in the refugee response. The REF should also be properly resourced to be able to fulfil its potential.

Resource mobilisation and tracking

The CRRF has attracted the increased attention and engagement of development partners and the rest of the international aid community. However, findings suggest that there remains a mismatch between the ambition of the CRRF – including the initial expectations of the government – and the actual financing provided by the international community for its implementation, especially the proportion of funding that is channeled through the government. This has left the SRPs (as well as the RRP) under-resourced.

There are multiple reporting structures, operated by OPM (Uganda Refugee Response Monitoring System - URRMS), UNHCR (ActivityInfo), the Ministry of Finance, Planning and Economic Development (Aid Management Platform - AMP), and those attached to each SRP, which are not systematically used – many KIs noted a reluctance among donors to report through government-led mechanisms, and findings suggest that no institution has a full overview of funding and implementation of activities. This results in an increased risk of duplication, as well as unidentified and unfilled gaps and priorities. A single "one-stop shop" systematic and transparent financial reporting mechanism should be developed, implemented, and transparently used by all stakeholders. As suggested by KIs, the mechanism would fall under the Ministry of Finance, Planning and Economic Development, and should be designed to allow for reporting against the NAP, the Strategic Direction, and the different SRPs. Additionally, humanitarian and development partners and implementing agencies should commit to systematic reporting and information-sharing at district-level, to ensure awareness among DLGs and to empower them to better identify gaps and needs, and plan and budget accordingly.

Monitoring and Evaluation

The evaluation has highlighted that there is no harmonised M&E system to track progress of the CRRF, and the monitoring of activities is conducted through parallel systems with limited interoperability. There are indicators in the Strategic Direction and the NAP 2021-2022, but there appears to be a lack of follow-up in measuring these indicators. In addition, findings suggest that there is a lack of awareness of these frameworks outside of the CRRF Secretariat, resulting in their insufficient use by government and international stakeholders. In this light, the Secretariat needs to ensure greater awareness among government and international stakeholders of these documents so that they can be jointly implemented. The next NAP is foreseen to cover the period 2023-2024 – work on elaborating this document and its concomitant work plan should commence as early as mid-2022 to ensure continuity, and to identify and prioritise those outputs that require increased attention, energy, and financing. The Inter-Sector Dialogue process, where MDAs discuss updates on CRRF implementation and compile joint messages to the Steering Group, should be further cultivated as a potential mechanism for systematic reporting on the progress and achievements of the CRRF, particularly of the SRPs.

Finally, while online platforms exist that provide information about the refugee response in Uganda, the availability of publicly accessible information about the CRRF in Uganda is limited. To enhance the understanding of all stakeholders about the implementation of the CRRF in Uganda, it is recommended that a single, comprehensive, updated and publicly accessible online CRRF knowledge management platform is established, which could include a repository of key documents, studies and learning tools.

Progress towards the pillars of the CRRF

The exact impact of the CRRF on progress towards the five CRRF pillars is difficult to determine: the plans and structures are relatively new, and the situation on the ground is influenced by a myriad of factors, many of them unrelated to the CRRF. In addition, the progressive policy framework was already established in Uganda years before the adoption of the CRRF. The impact of the CRRF on Pillars 4 and 5 is particularly hard to ascertain, as these pillars operate largely outside the influence of the CRRF architecture. Several key results, however, *are* likely attributable to the CRRF, particularly under Pillars 2 and 3. These include:

- A so-called 'refugee dividend' for RHDs, due to increased funding from international donors and attention from the central government, as well as the potential economic benefits that the refugees themselves bring.[3]

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[3] See Zhou, Grossman & Ge (2022) Inclusive refugee-hosting in Uganda improves local development and prevents public backlash.

- Improvements in the construction of sustainable facilities and infrastructure, notably in health, education, and water systems. However, there are concerning reports that emergency standards are not always being met in and outside of refugee settlements.
- The inclusion of both refugees and host communities in humanitarian and development programmes, though there are concerns on the appropriateness of and compliance with the recommended 70:30 ratio of assistance to these two groups, which should be adapted to a needs-, and vulnerability-based approach.
- An apparent overall improvement in social cohesion between refugees and host communities since the adoption of the CRRF. FGD participants indicated that accessing the same services and resources, and their mutual involvement in livelihoods projects, have contributed to enhanced social cohesion.
- The transition of services to government ownership, which is being implemented in the health, education, and water sectors, in several areas. The challenge going forward will be to ensure the sustainability of this transition.

In the context of limited humanitarian funding, some KIs raised concerns about a potential over-representation of development perspectives in the context of the CRRF. The Steering Group, Secretariat, and international community should ensure that continued attention is given to ongoing and unmet emergency humanitarian needs under CRRF Pillars 1 (Admission and rights) and 2 (Emergency response and ongoing needs).

Findings suggest a distinct and widespread lack of clarity as to how the transition of responsibility for the provision of essential services from the international aid community to government ownership is to be affected. Concerns were raised over the limited availability of long-term, sustainable international funding to underpin the continued provision of such services; similar concerns apply to the potential development of sustainable shock-responsive safety nets and other social protection mechanisms, to be extended to both refugee and host communities. In light of this uncertainty, development partners must continue to deliver on previous financial pledges and commitments to the CRRF in Uganda, and ensure continued and predictable funding, under CRRF Pillars 2 (Emergency response and ongoing needs) and 3 (Resilience and self-reliance), at a level sufficient to allow the sustainable delivery of integrated service provision by the government.

With ongoing conflicts and insecurity in several of Uganda's neighbouring countries, it is unlikely that refugee inflows will cease, and the need for international actors, both humanitarian and development, will likely remain. In this context, transition of essential services to government ownership certainly does not represent an exit strategy, but rather requires an adaptation of the roles and responsibilities of the international community. Attention should be given to re-defining and adapting the role of international actors in the framework of the CRRF, perhaps through less direct implementation, but continued provision of human and financial resources, and more support through local actors (government and civil society) and to capacity building.

Of the three traditional durable solutions, voluntary repatriation at scale is currently not a possibility for refugees from South Sudan and DRC, and third-country resettlement is not happening at a sufficiently large scale to constitute a viable solution for refugees in Uganda. In any case, it is unclear whether the CRRF institutions have any significant role to play in voluntary repatriation and resettlement, despite them being two of the five pillars of the CRRF in Uganda; they have certainly not received the same level of attention as the other pillars in the Secretariat and at the Steering Group. More broadly, the Steering Group should revisit whether the CRRF has a role to play in Pillars 4 and 5, and if so, what this role should be.

Progress towards pillars 4 and 5 could possibly be supported through the elaboration of a strategic advocacy plan to be communicated to donor capitals and regional governments. In addition, the Ugandan government should seek to further optimise its coordination with, and

leverage of, IGAD's regional engagement framework for refugees. This should entail mobilising resources, exchanging knowledge and good practices, and showcasing achievements, as well as advocating among IGAD Member States to address the root causes of displacement and to help facilitate voluntary return.

It is now five years since the adoption of the CRRF in Uganda. Its adoption coincided with one of the largest refugee inflows in Uganda's history, which required a major scale-up of the existing approach to the management of the country's refugee crisis. The Government of Uganda, supported by the international community, has made significant progress towards the objectives of the GCR and CRRF – though much remains to be done, including under each of the five CRRF pillars identified for Uganda. It is therefore recommended that a full evaluation of impact of the implementation of the GCR / CRRF in Uganda should be undertaken in 2025, coinciding with the completion of the Strategic Direction timeframe. Appropriate time and resources should be dedicated to this evaluation.

CONTENTS

List of Acronyms

BMZ	German Federal Ministry for Economic Cooperation and Development
CAO	Chief Administrative Officer
CRRF	Comprehensive Refugee Response Framework
DDP	District Development Plan
DLG	District Local Government
DoR	Department of Refugees
DPG	Development Partners' Group
DRC	Democratic Republic of Congo
ERP	Education Response Plan
FGD	Focus Group Discussion
GCR	Global Compact on Refugees
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
IGAD	Intergovernmental Authority on Development
KI	Key Informant
KII	Key Informant interview
LC	Local Council
LDPG	Local Development Partners' Group
M&E	Monitoring and evaluation
MDAs	Ministries, Departments and Agencies
MoFPED	Mstinistry of Finance, Planning and Economic Development
MoGLSD	Ministry of Gender, Labour and Social Development
MoLG	Ministry of Local Government
MoWE	Ministry of Water and Environment
MoU	Memorandum of Understanding
NAP	National Action Plan
NDP	National Development Plan
NGO	Non-Governmental Organisation
OPM	Office of the Prime Minister
PIAP	Programme Implementation Action Plan
PSFU	Private Sector Foundation Uganda
REF	Refugee Engagement Forum
RHD	Refugee-hosting district
RHPG	Refugee Humanitarian Partners' Group
RINGO	Refugee INGO Forum
RRP	Refugee Response Plan
RWC	Refugee Welfare Council
SOP	Standard Operating Procedure
STA	Settlement Transformative Agenda
SRP	Sector Response Plan
ToR	Terms of Reference
UBOS	Uganda Bureau of Statistics
UN	United Nations
UNHCR	UN High Commissioner for Refugees
URRMS	Uganda Refugee Response Management Monitoring System
WASH	Water, sanitation and hygiene
WFP	World Food Programme
WHO	World Health Organization

Figures, Tables and Maps

I. INTRODUCTION

This report evaluates the implementation of the Global Compact on Refugees (GCR) and its Comprehensive Refugee Response Framework (CRRF) in Uganda. In 2020, the CRRF Steering Group in Uganda took the decision to evaluate the implementation of the CRRF to make recommendations on the institutional frameworks and implementation strategies of its next phase, including the National Action Plan (NAP) 2021-22. The specific objectives of the evaluation, as set out in the Terms of Reference (ToR), are:

1. To analyse the CRRF's policy, institutional, organizational, financial, and technical dimensions, and processes with respect to their ability to achieve the outcomes and deliverables of the CRRF and objectives of the GCR.

2. To assess the results delivered across refugees and host communities, in order to determine the added value of the CRRF and how the refugee response has been shaped in Uganda.

3. To provide recommendations to inform the vision, strategy, planning, and implementation of the CRRF.

The evaluation is funded by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) through its Global Programme "Support to UNHCR in Implementing the Global Compact on Refugees", which provides support to the CRRF in Uganda on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ).

Following an open tendering process, IMPACT Initiatives, a leading Geneva-based think-and-do tank with specific expertise in data collection and analysis, evaluations, partnership development and capacity-building programmes, was contracted to conduct the evaluation. IMPACT was established in Uganda in 2017 in response to the large inflow of South Sudanese refugees, and has since maintained a strong presence, hosted, and provided operational support by their sister organisation, ACTED. The IMPACT team responsible for undertaking the evaluation is presented in annex A.

The evaluation focuses on processes and results, at the national, sectoral, and district levels; findings were drawn from 82 KIIs, encompassing a wide range of governmental and non-governmental interlocutors at national and district level and 14 FGDs with refugee and host community leaders at settlement or sub-county level, and a review of existing reports and other documentation.

1.1. Historical context

Uganda's refugee policy framework has long been widely recognised as highly progressive and inclusive. Uganda's policy towards refugees is regulated by the 2006 Refugee Act and the 2010 Refugee Regulations, which established an open-door policy to welcome and protect people fleeing conflict and persecution, and which offered refugees freedom of movement, the right to work, own property, and access to national services such as health and education. Some of these provisions even predated the Refugee Act and were enshrined in the Control of Aliens Refugee Act of 1960, which already included refugees' right to work.[4]

The 'self-reliance' model Uganda adopts has existed in different ways since its independence in 1962. The model was formalised through the Self-Reliance Strategy (SRS) in 1999, updated

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[4] Betts (2021) Uganda: The right to work and freedom of movement. *The Wealth of Refugees.* Oxford, UK: Oxford University Press.

by the Refugee and Host Population Empowerment Strategic Framework (ReHoPE) in 2016, after which it was replaced by the CRRF.[5] Uganda's Settlement Transformative Agenda (STA) 2016-2021 reiterated a non-encampment policy to refugee protection and assistance, under which refugees arriving in Uganda are provided with a plot of land for housing and cultivation.[6] Refugee management was fully integrated into Uganda's National Development Plans (NDPs) 2 (2015/16-2019/20) and 3 (2020/21-2024/25), establishing the foundation for a comprehensive response that addresses the needs of both refugees and Ugandans living in refugee-hosting districts (RHDs) through a lens of self-reliance, involving government ministries and development actors.

In September 2016, the UN General Assembly unanimously adopted the New York Declaration for Refugees and Migrants. The New York Declaration reaffirmed the importance of the international refugee regime (the 1951 Convention relating to the Status of Refugees and its 1967 Additional Protocol) and the legal framework for strengthening the protection of refugees (International Refugee Law, International Human Rights Law and International Humanitarian Law).

The New York Declaration recognised that humanitarian assistance programmes focused on refugee camps were no longer sufficient to address the increasing scale and protracted nature of refugee crises around the world. It proposed a new approach aimed at addressing the drivers and root causes of large movements of refugees (and migrants), as well as improving the self-reliance and resilience of refugees and addressing the needs of host communities, under a strengthened humanitarian-development nexus.

The New York Declaration also called for more equitable international responsibility towards the protection of refugees, and predictable support for their host countries; it introduced the innovative CRRF as a vehicle to achieve these objectives, and also proposed a Global Compact on Refugees (as well as a global compact for safe, orderly and regular migration).

The CRRF's four broad objectives are:
- Ease pressure on host countries
- Enhance refugee self-reliance (as distinct from full integration)
- Expand refugees' access to third-country solutions
- Support conditions in countries of origin for return in safety and dignity

The CRRF involves a multi-stakeholder approach, developed and initiated by UNHCR, in close coordination with hosting countries, and including other relevant UN agencies, INGOs (both humanitarian and development), donors, the private sector and other stakeholders. Tailored to each refugee crisis, the CRRF aims to engage development actors in addressing large-scale displacement, to address the needs of both refugee and host community populations, and to support the host government is assuming responsibility for the provision of essential services and livelihoods support. It specifies key elements for a comprehensive response to large refugee crises, including rapid and well-supported reception and admissions, support for immediate and on-going needs (e.g. protection, health, education), assistance for local and national institutions and communities receiving refugees, and expanded opportunities towards durable solutions.

The New York Declaration and its CRRF coincided with unprecedented refugee inflows in Uganda, primarily from South Sudan, the Democratic Republic of Congo (DRC) and Burundi, challenging Uganda's long-recognised progressive refugee model, and leading it to formally

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[5] Betts (2021) Uganda: The right to work and freedom of movement. *The Wealth of Refugees*. Oxford, UK: Oxford University Press.
[6] It should be noted that the STA II (2022-2025) is being finalised as of March 2022.

adopt the CRRF in March 2017, one of the first countries globally to do so[7]. The scale and progression of the crisis is illustrated by the following:

- In 2015, prior to the elaboration of the STA, Uganda hosted an estimated 430,000 refugees, of whom 167,000 were from South Sudan, 190,000 from DRC with the rest largely from Burundi, Rwanda and Somalia.[8]
- Between June 2016 and July 2018, Uganda received over 958,000 refugees, such that by the end of October 2018, Uganda was hosting over 1.15 million refugees, of whom 785,000 were from South Sudan, 284,000 from DRC, 33,600 from Burundi, with the rest largely from Somalia and Rwanda.[9]
- Uganda now hosts the largest refugee population in Africa, and the third largest in the world.[10] As of 31 January 2022, Uganda was hosting over 1.5 million refugees, of whom more than 950,000 were from South Sudan, more than 450,000 from DRC, and almost 50,000 from Burundi, with the rest largely from Somalia and Rwanda. Almost all (93%) are hosted across 13 formal refugee settlements in 12 districts in the northwest (primarily for refugees from South Sudan) and southwest (primarily for refugees from DRC) of the country, and with a minority living in Kampala.[11]

With the adoption of the CRRF in Uganda, a Road Map for its implementation was developed, subsequently revised, and adopted as the NAP 2018-2020. The NAP articulated five CRRF pillars for Uganda (see Figure 1), identified key stakeholders and established coordination mechanisms, including the CRRF Steering Group and Secretariat.

In December 2018, the GCR, initially foreseen in the New York Declaration, was endorsed by the United Nations General Assembly. This framework incorporated and built upon the CRRF. The GCR has the same broad objectives as the CRRF, namely easing pressures on host countries, enhancing refugee self-reliance, expanding access to third country solutions, and supporting conditions in countries of origin for return in safety and dignity. To further enhance self-reliance, the GCR also encourages other local initiatives as viable interim solutions, fostering the inclusion of refugees and the well-being of local communities, and preparing refugees for third country resettlement and voluntary return to countries of origin. 'Complementary pathways', such as family reunification processes, or student or employment visas, have also been proposed to enhance third country resettlement. The GCR lays great emphasis on the notion of international responsibility or burden-sharing, including through the establishment of Regional Support Platforms (IGAD, in the case of East Africa), and long-term predictable funding; it also introduces an Indicator Framework, a regular (4-yearly) Global Refugee Forum pledging event, and a commitment to measure the impact of hosting, protecting, and assisting refugees.

The launch and roll-out of the GCR, together with the completion of Uganda's NAP 2018-20, led to a re-assessment and refinement of Uganda's CRRF vision. This resulted in the new Strategic Direction 2021-25 which, as its name implies, foresees a transitioning from a focus on processes and systems to a focus on sustainable outcomes, drawing on successes and best practices and tackling risks and challenges. The Strategic Direction is largely aligned with the GCR objectives and the NDP 3 timelines and objectives and will serve as the reference framework to guide Uganda's CRRF priorities and activities over the 5-year period. The Strategic Direction encompasses five main components:

- Strengthening national arrangements
- Enhancing stakeholder engagement and coordination at district level

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[7] Other African countries signing up to the CRRF by September 2018 were Chad, Djibouti, Ethiopia, Kenya, Rwanda and Zambia, while IGAD's Nairobi Declaration (2017) represented the regional application of the CRRF to the Somali refugee crisis.
[8] OPM (2015) *Concept Paper for the Settlement Transformative Agenda project 2016-2021.*
[9] UNHCR (2019) *Comprehensive Refugee Response Framework: The Uganda Model.* Available here.
[10] UNHCR (2021) Refugee Statistics: Key indicators [website], accessed March 2022. Available here.
[11] UNHCR & GoU (n.d.) Uganda Comprehensive Refugee Response Portal [website, visited March 2022], available here.

- Mainstreaming the CRRF into national planning to address the long-term impacts of hosting refugees
- Fostering regional partnerships
- Ensuring international burden- and responsibility-sharing

The Strategic Direction will be operationalized by three consecutive NAPs (2021-22, 2023-24 and 2025), the first of which, (NAP 2021-22), presents a results matrix aligned to the Strategic Direction, and a 2-year work plan detailing the different outputs to be achieved.

As noted above, the CRRF Steering Group underlined the need to base the development of these guiding frameworks on a comprehensive evaluation. The CRRF evaluation has thus been included in the current NAP 2021-22.

1.2. The CRRF and the National Arrangements

Refugee management in Uganda falls under the mandate of the Office of the Prime Minister (OPM), guided by the OPM Department of Refugees (DoR). The humanitarian response is co-led by OPM and the UN High Commissioner for Refugees (UNHCR). As Uganda started shifting away from an emergency response to forced displacement towards a more development-oriented response, the CRRF was launched in Uganda in March 2017. As noted above, this framework is part of a global move to improve the protection of, and assistance to, refugees through better-coordinated and cohesive response frameworks, the sharing of responsibilities between national and international stakeholders, and support for refugee-receiving countries. The Ugandan CRRF identifies the following five core pillars, which are visualised in Figure 1.
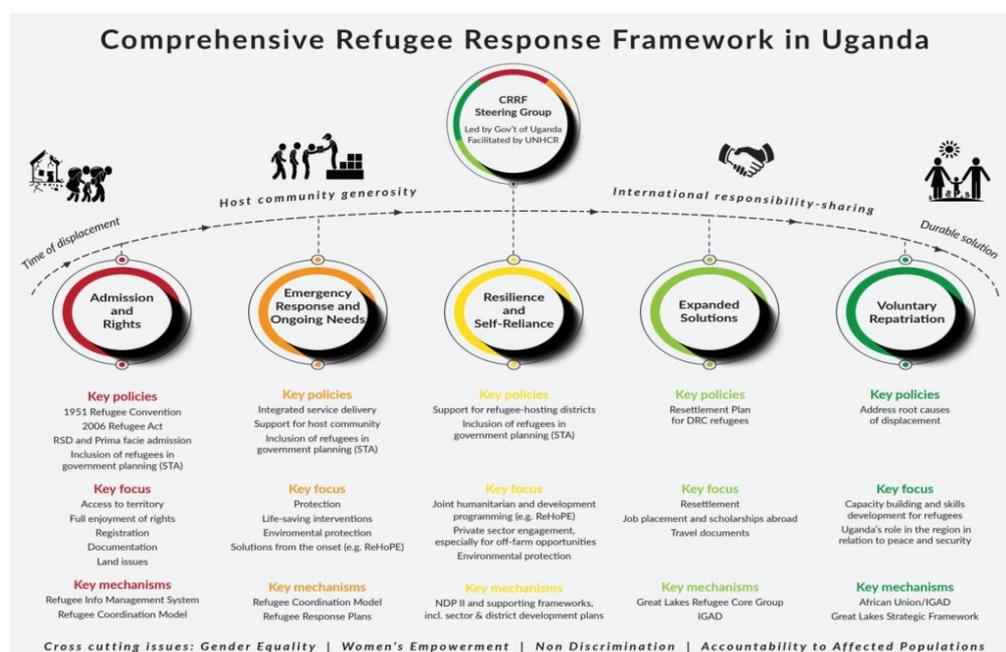
Figure 1. The pillars of the CRRF in Uganda[12]

The CRRF provides a whole-of-government and multi-stakeholder framework for the refugee response in Uganda, including both refugees and host populations, and addressing humanitarian and development dimensions with government-led Sector Response Plans (SRPs) for education, health, water and environment, jobs and livelihoods, and sustainable energy.

Following its launch in 2017, a CRRF Steering Group and a CRRF Secretariat, which supports the Steering Group, were established. Together, they represent the key national arrangements for the engagement of different sections and levels of government, humanitarian, development, and private sector partners, as well as the affected populations (refugee and host community). The Strategic Direction as well as the previous and current NAPs outline the specific roles and responsibilities of the Steering Group and Secretariat.

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[12] OPM (n.d.) Comprehensive Refugee Response Framework Uganda [website], accessed March 2022. Available here.

1.3. Stakeholder analysis

The CRRF in Uganda aims at a whole-of-government approach and involves a wide and fully comprehensive range of stakeholders including UN agencies, international donor agencies (humanitarian and development) and International Financial Institutions, international and national Non-Governmental Organizations (NGOs) and the Red Cross Movement, academia, the private sector, refugees and host communities, and other members of civil society. Different organisations and relevant personnel within these broad stakeholder groups were identified and prioritised as interlocutors by the evaluation team. Further detail on the key stakeholder groups is provided below:

Government of Uganda

The CRRF Steering Group and Secretariat represent the key national arrangements for the inclusive participation of these key stakeholder groups. The Steering Group, co-chaired by the Ministers for OPM and MoLG, coordinates the overall implementation of the CRRF in Uganda. All stakeholders mentioned in this section are represented at the CRRF Steering Group. The Steering Group is supported by the CRRF Secretariat, headed by a Director and housed within the OPM. The Secretariat pursues coherence across the different components of the CRRF to ensure a more robust comprehensive response in the RHDs. It supports stakeholder engagement and technical implementation of the CRRF, including the planning and monitoring of its roll-out in Uganda, and also provides analytical, communication and knowledge management support.

OPM is responsible for coordination and implementation of government policies, programmes and projects across Ministries, Departments and other public institutions, and coordinates the implementation of the NDPs. It is mandated to develop capacities for the prevention, preparedness and response to natural and human-induced disasters and refugees. The OPM is directly responsible for coordination of the overall refugee response, through its DoR, which is also established at sub-national and settlement level. It is supported in this by UNHCR, under an annual Project Partnership Agreement.

The National Planning Authority is responsible for overall guidance, technical support and mentoring local governments throughout the local government development planning and implementation cycle.

The Ministry of Finance, Planning and Economic Development (MoFPED) is responsible for providing financial resources, technical guidance and mentoring on budgeting required to effectively execute the National Development Programmes; as refugees are increasingly incorporated into NDP 3, MoFPED will necessarily play a greater role. The MoFPED also operates the Aid Management Platform (AMP), which tracks all international funding for Uganda, and is currently leading the development of a Private Sector Engagement Strategy for the CRRF.

The MoLG oversees and supports the Local Government development planning processes. With local governments at the frontline of the refugee response, the need for proper coordination with, and ownership by, RHDs, was recognised by the CRRF Steering Group from the start of the implementation of the CRRF.[13] The Uganda Bureau of Statistics (UBOS) is responsible for providing reliable data for planning, technical advice, and capacity development in data collection and management.

Line Ministries, Departments and Agencies (MDAs) are responsible for integrating district sector priorities in their sector plans, and supporting the financing and implementation of Local Government Development Plans. Specific CRRF-related SRPs have been developed for

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[13] OPM (2018) CRRF Secretariat: Strengthening District Coordination. *Issue Paper #1.* CRRF Secretariat, April 2018.

Education (Ministry of Education and Sports), Health (Ministry of Health), Water (Ministry of Water and Environment (MoWE), Jobs and Livelihoods (Ministry of Gender, Labour and Social Development (MoGLSD)), and Sustainable Energy (Ministry of Energy and Mineral Development). Steering Committees have been established under the leadership of the respective line ministries to oversee the elaboration and implementation of the different SRPs.

District Local Governments (DLGs) play a leadership role in terms of increasingly integrating refugees in District Development Plans (DDPs) and budget frameworks, spearheading the integration of refugee services at the district level, and ensuring overall coordination of CRRF implementation at district level.

The United Nations
In accordance with the 1951 Refugee Convention and the 2016 New York Declaration, UNHCR is the mandated coordinating agency supporting the Government's application of the CRRF in Uganda; UNHCR supports OPM under an annual Project Partnership Agreement, and is responsible for the elaboration and coordination of the Refugee Response Plan (RRP). Other UN agencies support the refugee response to the refugee situation in Uganda; these Agencies aim at the inclusion of refugees and host populations in existing and new programmes.[14]

International Donor Agencies and International Financial Institutions
Bilateral and multilateral donors[15] and development agencies are actively supporting the implementation of the CRRF in Uganda, through both humanitarian and development channels, allocating funding to the response in key RHDs - both refugees and host communities - and enabling the transition from humanitarian towards longer-term development response. These donor agencies coordinate their planning and activities in the framework of the Local Development Partners' Group (LDPG). Besides sector-specific Development Partners' Groups (DPG), support of development partners is also coordinated within a dedicated CRRF DPG. Many of these partners pledged support to CRRF implementation in Uganda at the Global Refugee Forum in December 2019. This Forum included the announcement of concrete pledges and contributions towards the GCR's objectives and to consider opportunities, challenges and ways in which burden- and responsibility-sharing can be enhanced; it is anticipated that the Forum will take place every four years.

National and International NGOs and the Red Cross movement
National and international NGOs are key stakeholders implementing both humanitarian and development programmes in the refugee response in Uganda. National NGOs coordinate their planning and activities under the National NGO Forum; international NGOs coordinate their planning and activities under the Refugee INGO Forum (RINGO). The refugee response is further supported by the Uganda Red Cross Society, which, in turn, is supported by the International Federation of the Red Cross and Red Crescent Society, and individual Supporting National Societies.

Refugees and Host Communities
Refugees are critical stakeholders in all planning processes and decisions that directly affect them; to ensure their representation, Refugee Welfare Councils (RWCs) have been established in each refugee settlement. At national level, the RWCs are represented by the Refugee Engagement Forum (REF), which in turn participates in the CRRF Steering Group. To ensure the representation, prioritisation, and ownership of districts and host communities, a focal person from the MoLG and five District Chairpersons and Chief Administrative Officers

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[14] A full overview of UNICEF's activities in the context of the CRRF can be found in UNICEF (2021) *Documentation of UNICEF Uganda Country Office (UCO) Contribution to the Comprehensive Refugee Response Framework (CRRF).*
[15] These donors include the World Bank, the European Union, the United Kingdom, the United States of America, Germany, Denmark, the Netherlands, Japan, Sweden, Ireland, and Norway.

(CAOs) are a part of the CRRF Steering Group. At district level, host communities are represented by Local Council (LC) leaders. Local community representation would be further enhanced by the proposed District Engagement Forum. The active engagement of both host communities and refugee populations is intended to promote equitable access to basic services, and thus peaceful co-existence, social cohesion, and eventually full integration.

Private Sector

The private sector offers potential for broader, more innovative, and ultimately more sustainable investments in refugee settlements, both for the refugees and the host communities, particularly in terms of jobs and livelihoods, sustainable energy, transport infrastructure, and telecommunications.

Academia

Some international and national academic institutions, as well as evaluation departments of international organisations and NGOs, have undertaken research into, and provide evidence for, the extent to which the CRRF approach is adopted, relevant and effective in yielding tangible results. Academic institutions can monitor, document, and evaluate the progress of CRRF processes and activities, and provide recommendations for a more appropriate, sustainable and comprehensive refugee response.

Regional partnerships

The key regional player in the application and rollout of the CRRF is the Intergovernmental Authority on Development (IGAD), whose Nairobi Declaration on Durable Solutions for Somali Refugees and Reintegration of Returnees in Somalia was subsequently expanded to all refugees across the IGAD area, and which represents the regional application of the CRRF. Subsequent to the Nairobi Declaration, IGAD Member States also committed to the Djibouti Declaration on Refugee Education (December 2017) and the Kampala Declaration on Jobs, Livelihoods, and Self-reliance (December 2019), plus the IGAD Support Platform (2019). Regional Offices of UN Agencies, international NGOs and other international organisations can also play a role in leveraging additional resources and ensuring quality and coherence of approach across refugee-hosting countries in the region.

II. METHODOLOGY

The evaluation studies the processes and deliverables of the CRRF, with the expectation that the findings will inform the next phase of CRRF implementation in Uganda, and a potential revision of the NAP and the broader Strategic Direction. It pays particular attention to the institutional framework and policies, and implementation strategies, as well as to the roll-out of the CRRF.

The evaluation also assesses the extent to which the broad objectives of the GCR as a whole have been met in Uganda. Given the Uganda-prioritised focus of the NAPs and the Strategic Direction, the timeframe of the evaluation and the resources available, the focus of the evaluation is inevitably on the first two of these objectives, namely easing pressures on host countries, and enhancing refugee self-reliance.

2.1 Evaluation questions

To address the objectives (see the I. **INTRODUCTION**), a series of preliminary questions were suggested in the initial ToR for the evaluation, grouped according to policy, organisational, institutional, financial, and technical focus areas. To enable clarity and structure, the evaluation team refined these slightly into five overarching questions, as follows[16]:

- **Policy**: To what extent and how has the CRRF supported the Ugandan government and other key stakeholders in the adoption of refugee-related policies and planning processes?

- **Organisational**: To what extent and how has the CRRF affected the organisation and coordination of the refugee response in Uganda?

- **Institutional**: What has been the effectiveness of the institutional framework of the CRRF in advancing the CRRF's goals?

- **Financial**: To what extent and how has the CRRF enabled the mobilisation, identification and tracking of (additional) financial resources for the refugee response?

- **Technical**: To what extent and how has the CRRF supported the planning and monitoring of refugee programmes in the response?

- **Results:** What key results have been delivered to refugees and host communities since the adoption of the CRRF?

2.2. Timeframe

The evaluation covers the period from 2017 when Uganda adopted the CRRF, aiming to take stock of its first five years of implementation, learning from best practices and experiences, as well as identifying gaps and challenges. The evaluation takes a structured and systematic approach to assessing the CRRF's roll-out in Uganda, with the ultimate aim of guiding the implementation of the CRRF from 2022 onwards and improving the protection and assistance of refugees through a coordinated, coherent, and sustained response.

2.3. Geographical scope

The evaluation has been implemented at national, sub-national, and district levels. At the national level, the overall implementation of the CRRF has been evaluated. To obtain a more

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[16] The evaluation team also developed a set of sub-questions specific to each focus area, detailed in Annex II.

granular understanding of the implementation of the CRRF, additional consultations were organised at sub-national, district, and settlement level.

Uganda has 13 refugee settlements located in 12 districts, as well as more than 95,000 refugees registered in Kampala. Eight RHDs were visited for in-depth data collection in December 2021: Adjumani, Kamwenge, Kiryandongo, Kikuube, Lamwo, Koboko, Isingiro, and Yumbe (see Figure 2. Map of assessed areas of the CRRF evaluation).

Figure 2. Map of assessed areas of the CRRF evaluation
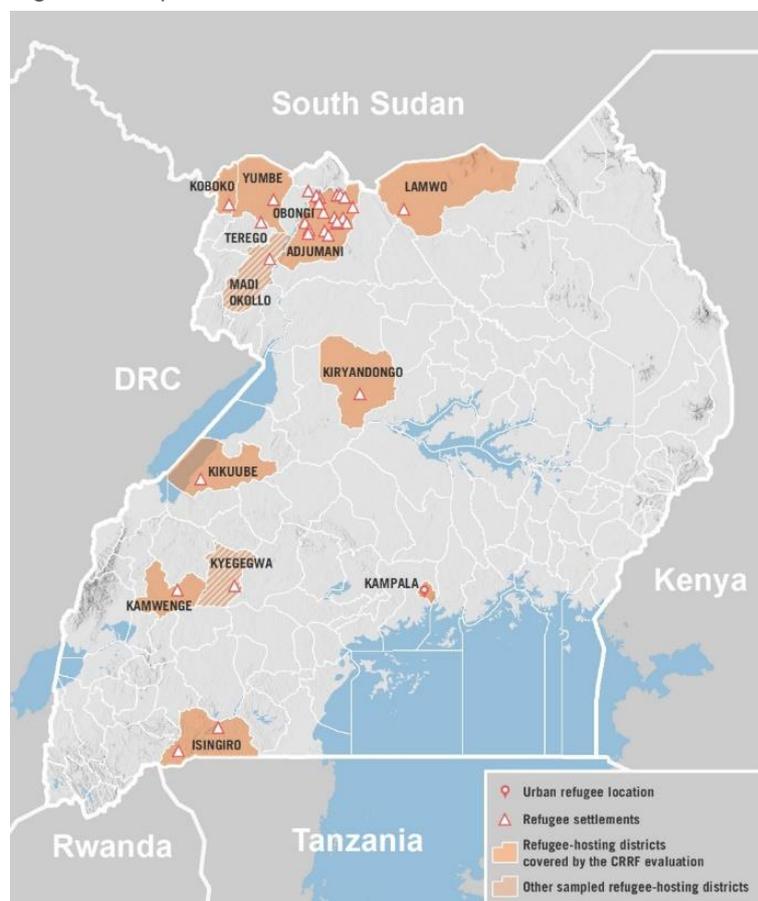
These districts were purposely identified according to the following criteria, to ensure a diversity of contexts to which the CRRF has been applied:

- Primary Country of Origin of the refugees in the district[17]
- Level of integration between host and refugee communities[18]
- Timeframe of arrivals[19]
- Settlement population size[20]

This diversity of contexts allowed for the identification and comparison of cases where the different mechanisms and approaches of the CRRF have worked well or less well, and the extent to which they have yielded results.

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[17] Presence in the district of refugees from South Sudan, DRC, Burundi, and/or Somalia.
[18] Proximity of the settlement to the host population and existence of integrated planning in the district
[19] Districts where the majority of refugees arrived during the 2017-2018 surge and settlements that have seen new arrivals from DRC in 2021.
[20] Districts with a relatively small refugee population size (e.g. Koboko, with about 5,000 refugees), districts with 50,000-100,000 refugees, and districts with more than 100,000 refugees.

Finally, the evaluation has taken account of the implementation of the CRRF in other countries, primarily within the East Africa region, to identify and document recommendations and lessons learnt that might be applicable to, and be replicated in, Uganda, as well as common challenges.

2.4 Data collection and analysis strategies

Table 1. Number of interviews and participants per stakeholder group

Stakeholder group	Number of interviews	Number of participants
Key informant interviews	**82**	**99**
International level	**4**	**4**
National and international level	**54**	**67**
Government	22	23
Donors and international financial institutions	10	11
UN and NGOs	17	23
Other (research institutions, private sector)	5	10
District level	**24**	**28**
District local government[21]	10	10
OPM (Refugee Desk Officers and Commandants)	5	5
REF members	3	3
District sector leads	6	10
Focus Group Discussions	**14**	**119**
Refugee representatives	7	51
Host community representatives	7	68
Total	**96**	**218**

To address the objectives and answer the evaluation questions, the evaluation draws on secondary data analysis and qualitative methods. The data was collected through a desk review, key informant interviews (KIIs), and focus group discussions (FGDs) between 24 November 2021 and 14 January 2022. Table 1 provides a summary of the KIIs and FGDs that were organised as part of the evaluation. It should be noted that some KIIs were held with multiple interlocutors, e.g. when belonging to the same organisation or programme. More information about these interviews is outlined in the next sections.

2.4.1. Desk Review

The evaluation includes an extensive literature review, based on a checklist of key relevant documentation. This review comprises secondary data analysis of both publicly available resources as well as documentation held and provided by the CRRF Secretariat, such as management and administrative procedures and guidelines, minutes and participant lists of meetings, and technical reports. This desk review has mostly been used to corroborate and contextualise the findings of the primary data collection.

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[21] District local government KIs include Chief Administrative Officers, Local Council leaders and District Planners.

2.4.2. Key Informant Interviews

IMPACT interviewed 99 key informants (KIs), identified from key government institutions, partner organisations and other stakeholders at the national, sub-national and district, as well as regional, level (71 at national and international level, 28 at sub-national, district or settlement level); selected regional actors were interviewed to provide a perspective vis-a-vis the implementation of CRRF in other countries. From each entity, one or multiple KIs were selected based on their knowledge and experience of the implementation of the CRRF. The interviews at national level were mostly held online, while the interviews at sub-national level were conducted in person.

2.4.3. Focus Group Discussions

In each of the eight selected districts, IMPACT mobilised the RWCs and local host community leaders (including LC1 and sub-county/LC3 leaders) to participate in a series of FGDs.

The FGDs were designed to facilitate community-level discussions so as to better understand the perceptions of affected refugees and host populations on the assistance they receive, and their perception of the changes in the organisation and coordination of this assistance over recent years. As such, the FGDs provided a beneficiary perspective of the effectiveness, efficiency, sustainability, and impact of CRRF on the target groups.

2.4.4. COVID-19 and data collection

In consultation with the relevant stakeholders, KIIs were conducted in-person or via virtual platforms. Wherever in-person data collection was undertaken, COVID-19 infection risks were minimised as the evaluation team strictly followed the regulations and Standard Operating Procedures (SOPs) of the Government of Uganda, as well as IMPACT's SOPs for data collection during COVID-19, developed in coordination with the WHO and the Global Health Cluster.[22]

2.5 Data analysis

2.5.1 Qualitative data analysis

Qualitative data obtained through the KIIs and FGDs were analysed using a 'data saturation and analysis grid'. In this context, thematic coding was used to link and track the themes addressed and issues raised by the interviews to the different interview questions.

2.5.2. Secondary data analysis

Descriptive statistics (e.g. on the number of meetings or participants) were collected throughout the desk review. Unfortunately, however, more meaningful, and reliable data such as on financial flows, school enrolment and job creation were often unavailable, either due to a lack of harmonised reporting mechanisms or as recent data was not available due to delays resulting from COVID-19. As a result, the evolution of most processes and results throughout the past five years is based largely on qualitative findings, cross-checked where possible by quantitative data, which has been used to better understand, contextualise, and triangulate the qualitative findings.

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[22] IMPACT (2020) *SOPs for Data Collection during COVID-19.* Available here.

2.6. Data quality assurance

The quality of the data and its analysis has been ensured in the following ways:

- The evaluation team relied on IMPACT's guidelines and policies related to research design, data collection, data analysis, and report drafting.
- The inception report, which was created to outline the methodology, was validated by IMPACT's research department in Geneva and the CRRF Reference Group.
- Data checks were conducted regularly by the evaluation team during the data collection phase, to ensure the proper interpretation of the questions by interviewers and respondents.
- The data was analysed using qualitative analysis methods to identify key themes across respondents.
- The data and analysis were reviewed among the consultants and went to a technical review and validation process by IMPACT's research department.
- Findings emerging from specific interviews and the desk review were triangulated or cross-checked against secondary data.

2.7. Confidentiality and data protection

In accordance with IMPACT's data protection guidelines, the anonymity of all participants – particularly potentially vulnerable populations such as refugee and host community leaders – was guaranteed to the greatest extent possible. The treatment of data and access rights to raw datasets have been specified in IMPACT's internal Data Management Plan, which can be made available upon request. Informed consent was requested from all participants in the KIIs and FGDs.

2.8 Challenges and limitations

- Given the very broad scope of the CRRF and the limited timeframe and available resources of the evaluation, it was difficult to fully address all aspects of the CRRF. Since the focus of the evaluation was on the application of the CRRF in Uganda, the team and the interviewees paid most attention to CRRF pillars 1 to 3, and less on pillars 4 (expanded solutions) and 5 (voluntary repatriation), as pillars 1 to 3 have been the main focus of the CRRF Steering Group and Secretariat.

- While the evaluation team interviewed a large number and range of stakeholders at national and district level, from the government and the international community, as well as with refugee populations and host communities, not all districts could be visited and not all relevant stakeholders could be interviewed. We made a purposive selection to ensure a wide range of perspectives from all key stakeholder groups.

- Measuring the impact of the CRRF is complicated, given 1) the policies, plans and processes established by the CRRF are still relatively new, and 2) the results on the ground are influenced by a complex array of factors, which in turn are also influenced by multiple concurrent factors, and are thus not always directly attributable to the CRRF.

- The COVID-19 pandemic has had socio-economic impacts across Uganda, including on the refugee response and how it is organised. This translated into a limitation on face-to-face meetings, adaptations to programme implementation, reduced funding, and other consequences. For the evaluation team, it meant that most interviews were held online, which bears risks of limited understanding of interlocutors, in particular when faced with connection issues during the calls. In addition, as field travel was more expensive due to the adherence to COVID-19 SOPs (e.g., the procurement of PPE, limitations to the number of staff per vehicle), eight out of 12 districts were visited.

- For many questions, respondents provided their 'perceptions' rather than facts. This in turn led to a risk that respondents' answers might be ill-informed or biased, as they may have an interest in providing answers that benefit their own agency or organisation. The evaluation team mitigated this as much as possible by triangulating with the responses from different stakeholders and, where available, with relevant secondary data.

- Not every stakeholder was aware / had knowledge of all aspects of the CRRF. We took this into account when designing the interview grids for each stakeholder and triangulating the findings.

- Despite repeated attempts, it was not possible to reach all pre-identified potential interlocutors, especially at regional (East Africa) and international level, limiting the depth and scope of the cross-country analysis.

III. FINDINGS

3.1 The development and roll-out of the CRRF in Uganda

3.1.1. Planning and policy processes

Available planning and policy documents

The key planning and policy documents specific to the CRRF in Uganda are the CRRF Road Map (later renamed NAP 2018-2020), the Strategic Direction (2021-25), the NAP 2021-2022 operationalising the Strategic Direction, and the series of SRPs. These documents are aligned to the CRRF approach, and their elaboration has been crucial for the roll-out of the CRRF in Uganda.

Table 2. Key planning and policy documents developed as part of the CRRF in Uganda

Name	Year[23]
Overarching documents	
2018-2020 Revised CRRF Road Map	2018
CRRF Communications and Outreach Strategy 2018-2020	2019
Strategic Direction 2021-2025	2021
National Action Plan 2021-2022	2021
Sector Response Plans	
Education Response Plan for Refugees and Host Communities (ERP)	2018
Health Sector Integrated Refugee Response Plan (2019-2024)	2019
Water and Environment Sector Response Plan for Refugees and Host Communities	2020
Jobs and Livelihoods Integrated Response Plan for Refugees and Host Communities	2021
Sustainable Energy Response Plan for Refugees and Host Communities	2021

According to the KIs in all different stakeholder groups, the development of these different policy documents, led by the Government and the CRRF Secretariat, were largely considered to be consultative processes, involving MDAs, development partners and the wider international community (UN and NGOs), as the CRRF allowed for different stakeholders to be brought together around a common direction. The processes demonstrated government engagement and ownership, further building on the progressive policy environment that was already in place. Having line ministries, whose involvement in the refugee response prior to the CRRF was limited, taking the lead on the development of the SRPs, was considered as one of the main positive effects of the development of the SRPs by KIs.

The development of the policy documents also promoted the operationalisation of the 'nexus' approach, bridging humanitarian and development dimensions in the refugee response. This is visible in the increased engagement of development actors and line ministries in the refugee response, as well as the inclusion of the host community in the programming of humanitarian actors: for both sets of actors this represented something of a departure from long-established practice. In addition, the SRPs promote the establishment of more sustainable types of interventions, moving away from emergency structures for education, health or water, sanitation and hygiene (WASH) facilities, with the vision that these facilities would ultimately be managed by the government.

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[23] Year of adoption by the CRRF Steering Group.

There is a sense among KIs that the CRRF, and in particular the SRPs, have generated additional development funding for the refugee response in Uganda, but that this has been considerably less than anticipated – and also largely unquantified. Government interlocutors pointed to the lack of long-term financial commitments by development partners, while development partners raised concerns on insufficient ownership and financial commitment from Government counterparts (see 3.1.4. Resource mobilisation and tracking).

Finally, there is a strong and prevailing view among interlocutors that the different plans and policies are potentially useful individual documents, but that there is insufficient connection and alignment between them, and insufficient follow-up in terms of actionable roadmaps or actual implementation – despite the availability of the 2-year work plan in the 2021-2022 NAP. This is particularly the case for the Water and Environment SRP and the Sustainable Energy SRP, which cover broadly the same themes. While the Sustainable Energy Response Plan does refer to its links to the other SRPs, including the Water and Environment SRP, it does not include how it will engage with the Water and Environment SRP and related working groups and secretariat to avoid duplication and identify respective areas of focus.

Geographic coverage of planning and policy documents

The CRRF in Uganda has traditionally focused on the districts that are hosting refugee settlements and urban refugees in Kampala; the so-called RHDs. However, several interlocutors raised concerns about a lack of attention to refugee-hosting areas outside of these recognised districts, or where refugees reside outside of the settlements. Furthermore, the reconfiguration of districts over time has complicated the implementation of the CRRF. These areas can be classified as follows:

- **Transit districts:** when entering Uganda, refugees arrive in 'transit districts' and reside in initial reception centres before being allocated a plot in one of the formal refugee settlements in an RHD. While the transit districts are not explicitly included in the scope of the planning and policy documents of the CRRF, systematic preparedness for future inflows is needed, and such inflows apply additional pressure on natural and infrastructural resources (vegetation, public buildings, water systems, etc.).

- **Secondary cities:** while refugees are registered and assisted only at settlement level, there are pendular movements of refugees to and from secondary urban areas, in particular Arua, Mbarara, and Gulu, where their presence is not properly captured, leaving them excluded from the CRRF planning processes. Interlocutors noted a reluctance to provide humanitarian or development assistance to urban refugees as this might generate a pull factor to areas already facing pressure in terms of access to land and housing, basic services, and livelihoods. That said, the presence of refugees in these secondary cities does affect the services provided in these areas, including for the residents of these cities, as the use of these facilities by refugees is not properly incorporated into urban planning figures.

- **Areas with self-settled 'refugees'[24]:** several KIs pointed out that an unknown number of refugees are 'self-settled' in border areas; they arrive without being officially registered and are not residing in the refugee settlements. However, these self-settled refugees do put additional pressure on existing resources, services, and infrastructure in the districts where they choose to settle.

- **Districts neighbouring the RHDs:** finally, given the large size of the refugee settlements in Uganda, they may also impact those districts bordering the RHDs; for example, affecting the environment, labour markets, services, and infrastructure – in positive or negative ways. The effects of the presence of refugees, and the refugee response 'industry', on districts beyond the RHDs are not captured by existing data and studies.

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[24] It should be noted that these self-settled 'refugees' are not legally considered refugees and did not apply for refugee status. This also means that the government, UNHCR and the rest of the international community do not have the same responsibility towards them as they do towards those with refugee status.

The discrepancy in the geographic coverage of the CRRF is clearly visible in the SRPs, which was made evident as part of the desk review and highlighted by KIs. Almost every SRP defines the geographic scope and targeting of districts differently, while some SRPs do not provide a definition at all. For example, the ERP and the Water & Environment SRP do not seem to cover refugees outside of refugee settlements, while the Jobs & Livelihoods SRPs also covers urban refugees in Kampala. Going beyond this, the inception report Sustainable Energy SRP would cover "rural, peri-urban and urban areas where refugees are living"[25] – although the draft version of the full SRP does not provide a definition[26], and the Health SRP includes support for "government health facilities in urban areas and prisons to provide health services to urban refugees, self-settled refugees and host communities" under Action 5.[27] In fact, the Health SRP recognises that resource shortfalls in health service provision in settings with urban refugees, self-settled refugees and refugees in prisons and host communities "results into frequent stock-outs, increased workload and catastrophic out-of-pocket spending for both communities"[28], citing the example of Arua Regional Referral Hospital, which is not supported by the refugee health programme even though refugees contribute "up to 30-40% to health services work load".[29]

Besides the ambiguities and inconsistencies related to the targeting of certain districts, there seems to be a certain disagreement as to who should be prioritised among the host community within RHDs. Officially, the government of Uganda defines host community the entire population of the district that hosts a refugee settlement. However, this is not always reflected in planning and programme implementation, which sometimes focuses on supporting the host community in sub-counties most directly affected by the presence of refugees (i.e. those covering, or adjacent to, the settlements). The coverage of certain sub-counties only is not compatible with government policy and excludes vulnerable host community members living further away from the settlements, who may have a lower level of access to services, considering that settlements often provide a concentration of services and infrastructures. It should be noted, however, that there is limited data available about the levels of vulnerability of the host community. Interestingly, the first view has mostly been expressed by KIs from the international community, while district-level KIs tend to be favouring the second position.

Again, the lack of consensus among stakeholders is reflected by different approaches taken by the SRPs. While the 'official' stance of the CRRF Secretariat is to include the full population of the RHDs, some of the SRPs only target those sub-counties within the RHDs most affected by the presence of refugees. For example, the ERP covers 34 refugee-hosting sub-counties, while in the Water & Environment SRP, water supply is only focused on 9 sub-counties[30] that host refugees and that did not have piped water supply systems at the time of the adoption of the SRP.[31] The Health SRP, on the other hand, takes a broader approach and does consider the needs of those living far away from the settlements.[32] Finally, the Jobs & Livelihoods SRP targets "host community households in refugee hosting districts", and has quantified the number of households to be covered by the plan – 1,152,087 – without providing an explanation of who would be covered by this number, and how it was calculated.[33] In short, while there may be a need for flexibility in the targeting of host communities, based on the district, sector, and levels of vulnerability, there is a need for plans and programmes to define

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[25] Ministry of Energy and Mineral Development (2020) Sustainable Energy Response Plan for Refugees and Host Communities 2022-2025: Inception report, p.5.
[26] Ministry of Energy and Mineral Development (2021) Sustainable Energy Response Plan for Refugees and Host Communities 2022-2025: Draft Version November 2021.
[27] Ministry of Health (2019) Health Sector Integrated Refugee Response Plan (2019-2024), p. 28.
[28] Ibid, p. 24.
[29] Ibid, p. 24.
[30] Ministry of Education and Sports (2018) *Education Response Plan for Refugees and Host Communities.*
[31] Ministry of Water and Environment (2020), *Water and Environment Sector Response Plan for Refugees and Host Communities.*
[32] Ministry of Health (2019) *Health Sector Integrated Refugee Response Plan (2019-2024)*
[33] Ministry of Gender, Labour and Social Development (2021), *Jobs and Livelihoods Integrated Response Plan for Refugees and Host Communities.*

who is targeted and why. In addition, a definition of the host community has not been included in the Strategic Direction nor the NAP.

Strategic Direction and National Action Plans

The Strategic Direction and the NAPs provide the over-arching framework for the CRRF in Uganda. These documents provide overall guidance for the implementation of the CRRF, including the milestones to be achieved and the deliverables to be met.

There is limited awareness of, or engagement with, the Strategic Direction and the NAPs outside of the Government and the CRRF Secretariat. Many KIs, in particular in the districts, indicated that there is a lack of an overarching strategic document, seemingly unaware of the existence of the NAPs and Strategic Direction. At the national level, a number of KIs, both from MDAs and from the international community, stated that there is a lack of indicators or a monitoring and evaluation (M&E) framework as part of the CRRF, while this is in fact included in the Strategic Direction. Similarly, the NAPs are generally not referred to in the SRPs.

Sector Response Plans

Whereas there is limited visibility for the NAPs and the Strategic Direction, the SRPs are relatively well-known among KIs, especially at the national level. They are considered by a wide range of KIs to be a key achievement of the CRRF, and are widely regarded as potential resource mobilisation tools, although it should be noted that not all partners align their programming with the plans, as was indicated by several KIs from the donor community. Again, the development of the SRPs was strongly supported by the CRRF Secretariat, the establishment of SRP Secretariats within the relevant line ministries, and the development partners and mandated humanitarian agencies (UN and NGOs). KIs highlighted that the elaboration of the SRPs was widely consultative and inclusive, though not always sufficiently early in the process. Many KIs held the view that the focus should now be on the consolidation, rollout, and implementation of these five SRPs as opposed to developing new SRPs.

The ERP, which was the first SRP developed as part of the CRRF, and was adopted in 2018, is widely regarded by KIs as the 'gold standard' SRP, considered high-quality both in process and product, with district-level ERPs already developed and under implementation. From the start, the ERP received strong buy-in from the Ministry of Education, and generated interest from both humanitarian and development donors, including global initiatives such as Education Cannot Wait.[34] According to KIs, the ERP was properly informed by a needs and gaps assessment, and is largely aligned with other policy processes, including the national Education Sector Strategic Plan and the RRP. It will be important to maintain the momentum through ongoing development of ERP 2.

Interlocutors also considered the implementation of the Health Response Plan, adopted in 2019, to be progressing well, including at the district level, although it has reportedly faced significant human and financial resource gaps due to the re-focusing of the sector on the response to COVID-19. In addition, KIs pointed out that the Health SRP Steering Committee meetings were not held sufficiently regularly.

However, several interlocutors noted a declining momentum since the development of the Education and Health SRPs, with a concomitant reduction in quality (process and product) and implementation of subsequent SRPs, which were considered by some to be insufficiently strategic, with variable identification of needs, gaps and priorities (Water and Environment, and Sustainable Energy) and at risk of being over-ambitious (Jobs and Livelihoods) – all of which restricts donors' appetite for the provision of resources to these plans. The implementation of the Water and Environment SRP meanwhile is considered to be too focused on access to water, with insufficient attention to environmental protection.

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[34] See Education Cannot Wait (2022) Uganda: Children of Hope, available here, which refers to the ERP.

While the different SRPs demonstrated government engagement at different levels, there is variable engagement from the relevant line ministries, with specific concern expressed about low capacity (specific reference was made to the MoGLSD) and a lack of financial and human resources provided by the relevant line ministries for the coordination and implementation of the SRPs (specific reference was made to the MoWE). The SRP-specific Secretariats hold a key potential role, but there is insufficient engagement between them, yielding insufficient synergies between the SRPs. DLGs were not always sufficiently engaged at the beginning of the SRP process, resulting in differential awareness and roll-out at district-level – with particular concerns raised about the Water and Environment, and Jobs and Livelihoods sector plans. The Sustainable Energy SRP has only recently been endorsed (December 2021), and we were therefore unable to assess its implementation.

In short, after a relatively consultative phase of SRP development, the quality of the end products varies; the SRPs are sometimes considered insufficiently prioritised, not all feedback from the consultation phase is considered, and in practice, several KIs among the donor community report difficulties in aligning their programmes with the SRPs due to predetermined agendas and priorities that lack the flexibility to contextualise them to the SRPs. Currently, with all SRPs in place, it will be paramount to focus on the effective implementation of the plans, which will heavily depend on the (financial) buy-in from both international and government actors; the engagement generated at the 'creation' stage will now need to be carried over into the implementation phase. This will likely also imply a larger focus on capacity development at MDAs and among DLGs, to further enhance government ownership and implementation of the plans.

CRRF alignment with existing planning and policy processes

The National Development Plan

Many interlocutors highlighted the increasing integration and anchoring of refugees into national planning, most notably under the NDPs 2 (2015/16-2019/20) and 3 (2020/21-2024/25). This process has been crucial in encouraging line ministries to integrate refugee populations in their planning and budgets, and local governments to integrate refugees into their DDPs, and in facilitating development financing to refugee populations.

Refugees were already included, though not systematically, in NDP 2, which was developed prior to the launch of the CRRF in Uganda; refugee issues were mainly addressed in the annex on the STA. The move, in 2020, from NDP 2 to NDP 3 presented both a challenge and an opportunity for the further mainstreaming of refugee issues in national planning.

In NDP 3, refugees were more systematically integrated into the body of the development plan. The plan itself took a radically different approach to the development plans that preceded it; instead of being structured around *sectors* (health, education, etc.) and directly linked to ministries, it came to be organised around *programmes*, and their Programme Implementation Action Plans (PIAPs). This new approach presents an opportunity for development action that breaks through silos. However, as it also prescribes a new way for MDAs to cooperate, several KIs have indicated that there is a considerable degree of confusion as to how the NDP 3 is to be implemented in practice.

This new approach has consequences for the integration of CRRF-related policy documents – and in particular the SRPs – into the new NDP 3. As the majority of the SRPs were conceived prior to the launch of the NDP 3, and are still organised by sector, there is a considerable challenge for SRP Secretariats in ensuring the SRPs' alignment with the programming approach and monitoring systems of the new NDP 3, although efforts have been made to realign the SRPs to the new programme-based approach.

District Development Plans
According to district-level KIs, Districts Local Governments have generally started to include refugees in their DDPs and budgets, progressing towards one of the outcomes of the Strategic Direction[35]. Results of KIIs suggest that the DDPs are to various degrees be aligned to the SRPs, in particular the Education and Health SRPs, which were developed first. However, with the exception of the ERP, several national-level interlocutors noted insufficient cascading of the SRPs down to the district. Meanwhile, several district-level interlocutors claimed that there is insufficient allocation of resources to districts (by government and development partners) to allow full implementation of the SRPs at district level.

The Refugee Response Plan
The CRRF is meant to guide interventions in both the humanitarian (in particular under CRRF pillars 1 and 2) and development (in particular under CRRF pillar 3) sectors. On the humanitarian side, OPM and UNHCR develop the RRP every two years; a costed plan that outlines the key priorities for the refugee response. With the development of the SRPs, some KIs raised questions as to whether the RRP is still relevant, and to what extent the SRPs cover, or should cover, the emergency needs that are also covered by the RRP.

While noting the importance of the engagement of government and development actors, several humanitarian interlocutors argued that the SRPs (and the NDPs) pay insufficient attention to humanitarian needs and provide only basic (but improving) alignment between the SRPs and the RRP. That said, most SRPs do emphasise the need for the inclusion of both development and humanitarian needs, rather than moving away from emergency response. For example, the ERP, the Health SRP and the Water & Environment SRP all draw on the 'comparative advantages' of humanitarian and development actors and address both "immediate humanitarian crisis-response as well as medium- and long-term investments towards recovery and development".[36] It should be noted, however, that the plans adopt exactly the same language, and have likely copied the language from one another, potentially indicating a lack of proper contextualisation of what these 'comparative advantages' mean in each sector. The Jobs & Livelihoods SRP is the only one explicitly mentioning the objective to move away from humanitarian assistance.[37]

The SRPs do not address all humanitarian sectors (e.g., food/cash transfers; shelter and non-food items; protection), and there is a high likelihood of continued new inflows, and therefore ongoing and new emergency needs. With this in mind, many interlocutors, including from the government, considered that the RRP is still highly relevant, and will continue to be so.
KIs noted a lack of alignment between the SRPs and the RRP, with two different approaches emerging:

1. The 'ERP' model, where the SRP and the relevant sections in the RRP (in this case related to education) are completely aligned. This includes an alignment of objectives and indicators, without discrepancies related to the scope of the two documents.

2. The 'Water and Environment SRP' model, in which the SRP covers the more development-related aspects of the provision of water systems, while the RRP is focused on emergency needs. It should be noted that here, besides the discrepancy in focus, there is the added challenge that there is no one-to-one overlap between the Water and Environment Ministry and the Water and Sanitation Sector Working Group under the RRP, the former covering both water and environment issues and the latter covering the sector of water, sanitation, and hygiene.

As the Water and Environment SRP shows, complete alignment might sometimes be difficult due to differences in scope between the ministries and sector working groups, and it is

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[35] OPM (2021) *CRRF Strategic Direction 2021-2025*; outcome 2.1.
[36] Ministry of Education and Sports (2018) *Education Response Plan for Refugees and Host Communities*, p. 22, and Ministry of Health (2019) *Health Sector Integrated Refugee Response Plan (2019-2024)*, p. 10., Ministry of Water and Environment (2020), *Water and Environment Sector Response Plan for Refugees and Host Communities*, p. 1.
[37] Ministry of Gender, Labour and Social Development (2021), *Jobs and Livelihoods Integrated Response Plan for Refugees and Host Communities*.

therefore understandable that different models of alignment between the SRP and the RRP exist for different sectors. The elaboration of the 2022-2025 RRP has included a deliberate strategy to better align the RRP with the CRRF, and in particular the SRPs, so as to ensure that neither development or emergency needs become neglected.

Other planning and policy documents
Several interlocutors noted that the CRRF-related policy documents need to be considered within a broader context of existing non-refugee specific planning and policy documents. Besides the NDPs, the DDPs and the RRPs, which have been described above, this also includes several other policy documents. KIs have provided examples of documents they are using in the implementation of their interventions, including the "Parish Development Model"[38], the Peace, Recovery and Development Plan, the Agricultural Sector Policy, and the Disaster Response Management Plans, as well as international frameworks, such as the 2030 Agenda and the related Sustainable Development Goals[39]. While the policy context, along with corresponding regulations and relevant policy documents, are generally included in the different SRPs and provide a useful overview of relevant existing frameworks, not much attention seems to have been given in these documents on how exactly the SRPs will relate to and align with these documents, and what the specific opportunities and challenges are related to their alignment with the broader policy environment. It should be noted, however, that the recently created Sustainable Energy SRP does include an overview of the interactions between the policies and the position of the SRP in this broader policy framework.[40]

Refugee response actors in Uganda should also better align with, and potentially leverage, IGAD's broader regional engagement framework for refugees. This began with the Nairobi Declaration on the Somali Refugee Situation 2017 (subsequently expanded across East Africa as the regional application of the CRRF), and its consequent Djibouti Declaration on Refugee Education and Kampala Declaration on Jobs and Livelihoods. These provided the basis for the Education SRP and the Jobs & Livelihoods SRP. Building on these initiatives, the IGAD Support Platform, launched at the Global Refugee Forum in December 2019, is a comprehensive cooperative approach for Member States' refugee responses in the region, serving as a means to mobilise resources, to exchange knowledge and good practices, to showcase achievements of states in the region and to undertake advocacy within the IGAD region to address the root causes of displacement and to help facilitate voluntary return[41] (see International and regional engagement).

Planning and policy gaps

Following the endorsement of the Sustainable Energy Response Plan in 2021, few interlocutors saw the need for the creation of new SRPs, for sectors or topics that had not yet been covered, at this stage. KIs generally sensed that the focus should now be on the implementation of the existing SRPs. Some interlocutors also questioned the value of additional SRPs given that refugees are now already included in the NDPs and DDPs.
That said, an Infrastructure SRP is reportedly being developed, and is noted in the CRRF Secretariat's Annual Workplan 2022[42]. Given the many potential overlaps with existing SRPs (such as the education and health SRPs), some KIs suggested that the Infrastructure SRP

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[38] The Parish Development Model, to be implemented from 2022 onwards, is aligned with NDP 3 and would 'deepen the decentralisation process' in order to alleviate poverty among Ugandan households. As such, it could significantly affect relations between the national, district, sub-county and parish level and therefore have an effect on the roll-out of the CRRF in Uganda. At the time of the evaluation, however, KIs had limited awareness of the Parish Model and the possible consequences for the CRRF. More information about the Parish Model can be found in the Ministry of Local Government's *Implementation Guidelines for Parish Development Model* (June 2021), available here.
[39] The Strategic Direction specifically refers to SDGs 1, 3, 4, 6, 7 and 8 and anticipates that the implementation of the CRRF and its SRPs will reduce poverty among refugees and host communities, provide services of education, better health, clean water and sanitation, and alternative energy.
[40] Ministry of Energy and Mineral Development (2021) Sustainable Energy Response Plan for Refugees and Host Communities 2022-2025: Draft Version November 2021.
[41] OPM (2021) *CRRF Strategic Direction 2021-2025*, pp. 21-22
[42] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*; output 3.1, main activity.

should focus on those areas that are not yet covered (e.g. road construction) and ensure close alignment with SRPs that have already been developed.

However, several interlocutors emphasised the need for developing or revisiting, finalising and institutionalising the following cross-cutting documents or guidelines:

- **Settlement Strategy[43]:** several interlocutors are pleading for the creation of a strategy to better streamline and standardise the creation and management of refugee settlements under a common approach, as this is currently done on a more or less 'case-by-case basis'. This would include the harmonisation of the spatial planning of settlements (e.g. the organisation around consolidated residential areas or scattered homesteads), ensuring better preparedness for future inflows, improving agricultural land management, adopting a more development-focused approach, and establishing common standards.[44] This strategy could also include a tool or model to help identify the best areas for settlements in relation to the surrounding environment and resources, as suggested in the Water & Environment SRP.[45] It should be noted that some KIs questioned the extent to which the standardisation of settlement creation and management would be useful, considering that each settlement has a different context, and may be guided by different land ownership regulations. A "Settlement Land Management Strategy" is supposed to be developed according to the 2021-2022 NAP[46], although there was a lack of clarity among the KIs as to the current status of the strategy. There is no mention of a Settlement Strategy in the CRRF Strategic Direction[47], but it is foreseen in the Secretariat's 2022 Annual Workplan[48].

- **Private Sector Engagement Strategy:** the importance of engagement with the private sector, in particular to ensure the sustainability of the CRRF approach, has been stressed by a large number of interlocutors, and had prompted the development of a Private Sector Engagement Strategy in 2019. Upon finalisation of the draft strategy in early 2020, however, it became clear that relevant government actors had been insufficiently consulted throughout the development of the document. The strategy is now being revitalised, under the leadership of the MoFPED, and according to the 2021-2022 NAP, the strategy should have been developed by Q2 2021 and its creation is therefore delayed compared to the timeline in the NAP.[49] A wide range of KIs confirmed the continued need for the finalisation of the strategy to enhance the engagement with the private sector (see Private sector engagement).

- **Localisation Strategy:** the Localisation Agenda aligns closely with the CRRF objectives, strengthening the role of local and national assistance providers in the refugee response. In 2018, an initial paper on operationalising the localisation agenda in Uganda was provided to the CRRF Steering Group.[50] The agenda has been further taken forward as part of the CRRF's Strategic Direction,[51] and the establishment of a Localisation Task Force, as well as a roadmap to advance localisation, is included in the 2021-2022 work plan of the NAP[52]. Interlocutors confirmed the importance of moving this process forward, in particular due to the limited space and resources provided to national and local NGOs in the refugee response. A concept note for the Localisation Task Force and roadmap was presented to the CRRF Steering Group in December 2021.[53]

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[43] The Settlement Strategy should not be confused with the Settlement Transformative Agenda (2016-2021), which preceded the CRRF, was annexed to the NDP 2, and provided a framework to 'achieve the self-reliance and local settlement for refugees and to promote social development in refugees hosting areas as a durable solution to the refugees' problem, while protecting national and local interests' (OPM (2015) *A concept paper for the settlement transformative agenda project*).

[44] The lack of standardisation was also mentioned in the CRRF Secretariat's *Issue Paper on Strengthening District Coordination* (2018), which notes that existing service delivery standards, and standards for the humanitarian response (i.e. the SPHERE standards) are not always the same (p.6).

[45] Ministry of Water and Environment (2020), *Water and Environment Sector Response Plan for Refugees and Host Communities*, p. 26.

[46] OPM (2021) *National Plan of Action 2021-2022*.

[47] OPM (2021) *CRRF Strategic Direction 2021-2025.*

[48] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*; Pillar 3, output 3.2.

[49] OPM (2021) *National Plan of Action 2021-2022*.

[50] RINGO (2018) *Operationalization of the localization agenda in Uganda: A paper prepared for presentation to the CRRF steering committee.*

[51] OPM (2021) *CRRF Strategic Direction 2021-2025.*

[52] OPM (2021) *National Plan of Action 2021-2022*.

[53] OPM (2021) *Investing in Local Humanitarian Action: CRRF Task Force and Road Map Concept Note.*

- • **Guidelines for the transition of service facilities to government ownership**: under the CRRF, facilities should as much as possible be 'coded' and eventually moved under the management of the Government of Uganda. As part of the SRPs, this process has already started, notably in the education and health sectors, as well as, to a certain degree, in the context of water systems. However, KIs, both at national and district level, pointed out that there is a lack of guidance related to how exactly this transition should be implemented, and how their sustainable transition and management is envisioned, including the availability of longer-term financial commitment for these services. In fact, the ERP already identified the need for such a document in 2018, when it recommended the Ugandan Government "to develop a long term plan to transition primary schools to Government ownership and/or oversight" and suggested this could include "exploring new approaches to partnerships between Government of Uganda and non-state providers of education".[54] It further added that the transition of facilities will "require long term donor support for increased recurrent costs."[55] The CRRF Secretariat's Annual Workplan 2022 includes the development of a Transition Strategy, or guidelines[56].

Finally, a number of interlocutors raised the importance of better mainstreaming of protection and gender in the existing SRPs. While protection working groups were consulted during the development of the SRPs, some KIs argued that they were not involved early enough in the process, or that their input has not been taken into account in the final product. One KI suggested to strengthen the protection and gender elements during the mid-term review processes of the existing SRPs.

Communications and Outreach Strategy

In 2018, the CRRF Secretariat launched the *2018-2020 CRRF Communications and Outreach Strategy*. The strategy aimed to "increase the flow of information to different audiences and structures of funding mechanisms" in order to "stimulate home grown solutions, call upon non-traditional donors to come on board, encourage the traditional donors to increase on the funds allocated, and urge implementing partners to efficiently use the scarce resources available to them".[57] As noted later in this report, communication and awareness raising are key to the successful roll-out of the CRRF, in particular due to the many stakeholders involved in its implementation and the evolving mandates and roles these stakeholders adopt in the context of the CRRF. As such, the CRRF will only be as strong as the stakeholders owning its vision and driving it forward.

The Communications and Outreach Strategy provides a relatively detailed overview of messages to be communicated to each stakeholder group, with a focus on 'primary audiences' - host communities; policy makers and opinion leaders; funders and donors; and refugees – along with tools and channels to be used to communicate these messages. The strategy also includes an M&E framework, along with a financing strategy and a detailed work plan.

Although the strategy contains a detailed set of messages, tools and implementation plans, there are several important points for further consideration. First, the strategy is built around the *one-way* communication of messages to stakeholder groups, rather than genuine *two-way* engagement with these stakeholders, and between different stakeholder groups. The CRRF Secretariat's Annual Workplan 2022 foresees a review and adoption of the strategy[58] – if a new version of the strategy were to be created, it would be worth rebranding and focusing it to encompass not just communication, but also engagement, to ensure the active involvement of other stakeholders in the strategy. In this context, it should also be noted that none of the

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[54] Ministry of Education and Sports (2018*) Education Response Plan for Refugees and Host Communities*, p. 14.
[55] Ibid, p. 47.
[56] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*; pillar 3, output 2.1
[57] OPM (2018) *Communications and Outreach Strategy 2018/20: Comprehensive Refugee Response Framework (CRRF) Office of the Prime Minister*, available here, p. 7.
[58] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*; pillar 6, output 4.2

interlocutors outside of the CRRF Secretariat indicated their awareness or use of the Communications and Outreach Strategy.

In addition, the strategy divides stakeholders into two categories, "primary audiences" and "secondary audiences", the latter category including MDAs, local governments, UN agencies and NGOs. Given these stakeholders, and in particular MDAs and DLGs, are crucial for the roll-out of the CRRF, it would be important to prioritise them in any potential new strategy. Similarly, it would be worth better highlighting actors whose engagement so far has been somewhat deprioritised, such as the private sector and academia.

Finally, although the strategy makes a reference to the five pillars of the CRRF, the strategy focuses primarily on the first three, with limited to no attention given to pillar 4 (expanded solutions) and pillar 5 (voluntary repatriation). Depending on the role the CRRF will be playing in these two pillars in the future (see Pillar 4: Expanded solutions and Pillar 5: Voluntary repatriation), a new strategy will need to take all pillars of the CRRF into account.

3.1.2. Coordination mechanisms

The implementation of the CRRF has mostly relied on existing coordination mechanisms through which the CRRF has been mainstreamed. These include the DPG and the RRP-related working groups. In addition, a number of new coordination forums have been established, notably the CRRF Steering Group (see CRRF Steering Group), the REF (see Refugee Engagement Forum), and specific coordination bodies for the SRPs. In short, the CRRF relies on a broad array of coordination mechanisms and platforms at different levels to facilitate the development and awareness of the CRRF in Uganda, and to promote its effective roll-out and implementation. Most KIs, at both national and district level, reported appreciating the role played by the CRRF Secretariat in driving coordination between the different stakeholder groups (see CRRF Secretariat).

Across stakeholder groups, KIs generally considered that there are sufficient coordination mechanisms in place, and despite a degree of overlap and duplication, KIs generally reported that these mechanisms are largely functional. That said, there is a reported lack of synergy between them, especially at sector level. For example, for each sector, there are coordination mechanisms in the frameworks of the RRP, the DPG, the SRPs (or at least spearheaded by an MDA), as well as those connected to the NDP 3 and the different PIAPs. As issues tend to be discussed at multiple forums, this can result in inefficiencies: no-one can attend all the different meetings, and as meetings are sometimes held without clear agendas, decision-making authority and structured feedback, there may be a creeping risk of 'coordination fatigue'. As suggested by the EU Trust Fund's Research and Evidence Facility, "the various refugee coordination mechanisms…can feel like a complex maze that is difficult to navigate, and it's not always clear who is doing what or how these different structures link up".[59]

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[59] Research & Evidence Facility (2020) *Comprehensive Refugee Responses in the Horn of Africa: Regional Leadership on Education, Livelihoods and Durable Solutions.* London: EU Trust Fund for Africa Research and Evidence Facility. The study refers here to the Sector Working Groups, the LDPG, the RHPG, the CRRF DPG and the National Partnership Forum.

Table 3. National-level coordination mechanisms relevant to the roll-out of the CRRF in Uganda

Forum	Participants	Chairs
Inter-sector coordination mechanisms		
CRRF Steering Group	High-level officials of all stakeholder groups	OPM and MoLG
REF	Refugee representatives	Refugee representatives
DPG	Development partners, with UN agencies and NGOs (development focus)	World Bank and the Danish government
Refugee Humanitarian Partners Group (RHPG)	UN agencies, NGOs and development partners (humanitarian focus)	UNHCR and BPRM
Inter-Agency Meetings	OPM, MoLG, UN agencies and NGOs	UNHCR, OPM and MoLG
Inter-Sector Dialogue	MDAs involved in the roll-out of the CRRF	CRRF Secretariat
RINGO	International NGOs active in the refugee response	International NGOs
Sector-specific coordination mechanisms		
RRP Sector Working Groups	Relevant MDAs and humanitarian partners	Relevant line ministry and technical partner (UN/NGOs)
DPG Working Groups	Development partners, with relevant UN agencies and NGOs	Development partners
Working groups at MDAs	Government actors and others involved in the roll-out of the SRPs	MDAs

Intra-government coordination

Following the adoption of the CRRF in Uganda, there was strong initial enthusiasm and engagement at the senior level of the Ugandan government, including the line ministries, as well as the OPM. KIs have pointed out that prior to the adoption of the CRRF, the refugee response was predominantly led by OPM DoR and UNHCR, with little to no significant engagement by MDAs and development partners. The inclusion of those actors in the refugee response can be seen as a key achievement in this regard.

However, KIs indicated that the increase in the number of partners engaged in the refugee response may have coincided with a lack of clarity on where the mandate of DoR stopped and the mandate of MDAs, DLGs and the CRRF Secretariat started. The inclusion of new stakeholders, and the importance of generating a sense of ownership among these stakeholders, also meant that existing relations, roles and responsibilities had to be redefined. Both government KIs and KIs from the international community noted that this resulted in tensions, in particular between DoR and other government agencies, and in particular between the CRRF Secretariat and DoR, not least due to differences in hierarchies between the Director of the Secretariat and the Commissioner of the DoR (see CRRF Secretariat).

While some of these difficult relationships still exist, and the lack of clarity on the exact roles and responsibility of each stakeholder continues to influence the effectiveness of the roll-out of the CRRF, relations do seem to have improved over time. KIs listed several measures and processes that played a role in enhancing these relations, including the co-chairing arrangement of the Steering Group by the MoLG, the creation of an MoU between UNHCR, MoLG and OPM, and changes in leadership at both DoR and the CRRF Secretariat. It should be noted that KIs at DoR generally saw the increased involvement of the MDAs and DLGs in the refugee response as a positive development, and noted the important work done by the CRRF Secretariat, even though KIs continued to disagree about the Secretariat's position outside of DoR (for more on this, see CRRF Secretariat).

Aside from challenges related to overlapping or unclear mandates, concerns have also been raised related to the continued momentum for the CRRF among MDAs, and the degree of

ownership government agencies are willing to take to drive the CRRF forward. The high-level interest in the CRRF that was there at the outset, including at certain MDAs (e.g. the Ministry of Education) seems to have decreased, and a number of KIs – in particular development partners – have indicated a certain frustration related to the lack of human and financial resources provided by these agencies to the implementation of the CRRF (in particular the SRPs), as it continues to rely heavily on international funding.

At the sectoral level, MDAs seem to continue to engage mostly in silos. Although the CRRF – as well as the programme-based approach of NDP 3 – provides opportunities to coordinate activities more closely, government KIs noted that this has not yet been incorporated into the MDAs' ways of working. This is visible in the SRPs themselves, which do not sufficiently cross-reference each other, and a limited degree of learning between the agencies. It should be noted that the recently initiated Inter-Sector Dialogues, when structured well, could provide a real opportunity for meaningful engagement for the identification of synergies, common challenges and lessons learnt between MDAs.

As noted in the Strategic Direction, the CRRF and its national and sector-level arrangements need to be clearly rooted in government structures. True Whole-of-Government coordination needs to be implemented with all relevant agencies, beyond those that are directly involved in the CRRF (the ministries hosting the SRPs, OPM and the MoLG). A number of KIs have welcomed the increased engagement by the MoFPED and the National Planning Agency, whose sustained and meaningful involvement will be important for the continued roll-out of the CRRF. In addition, there is a need to clarify the roles of other relevant MDAs, such as UBOS, the Ministry of Internal Affairs, the Ministry of Foreign Affairs and the Ministry of Housing and Urban Development. For these agencies to further enrich the CRRF, their roles will need to be more clearly defined, as well as the resources needed for their involvement.

National-district coordination

Anchoring the CRRF at local levels remains key to successful implementation; Pillar 2 of the Strategic Direction aims towards enhancing stakeholder engagement and coordination at district level.

Findings suggest that national-district level coordination has been greatly enhanced by having MoLG as co-chair of the Steering Group, since MoLG will be a key player in the sustainable roll-out and implementation of the CRRF at district level. Several KIs highlighted the usefulness of district or regional-level workshops organised, mostly prior to the COVID-19 pandemic, involving staff of the CRRF Secretariat and different MDAs from Kampala and relevant staff from the DLGs (CAOs) and OPM (Refugee Desk Officers). These field visits reportedly enhanced coordination, brought district-level concerns to the attention of the central government, and also provided a potential channel for district, sub-county and parish-level contributions to national-level planning and policy development.

However, according to both national and district-level KIs, there remains a disconnect between the national (Kampala) and district level concerning CRRF structures, processes and plans, with concerns that what is planned and agreed in Kampala is not systematically disseminated to, and understood by or implemented at, district level. This pertains to both government and non-government agencies.

For instance, there was a widely-held view among district-level KIs that there remains a lack of awareness of the CRRF among DLGs, although an acknowledgement that this is being addressed and improved, not least through the support of international actors and MDAs (e.g., through trainings, capacity-building and support in aligning the DDPs with the SRPs). In addition, DLGs are reportedly insufficiently involved in national-level coordination, further limiting the influence and ownership they could have over the implementation of the CRRF in their district. KIs reported a continued need for field visits from national-level actors, and

awareness-raising and capacity-building at district-level, not least due to the turnover of staff at district-level; this should include resource allocation and budgeting processes and aligning DDPs with NDP 3 (which is not specific to the CRRF only). The CRRF Secretariat's Annual Workplan 2021 identified a need for "Accelerated Action Plans" specifically for newly-created RHDs such as Terego, Madi Okollo and Obongi, to assist in addressing such capacity gaps; the Annual Workplan 2022 expanded this to CRRF induction workshops for all district governments[60]. Generally, national-level KIs pointed out that there are technical and logistical capacity gaps at district-level (i.e. beyond awareness of the CRRF), and some district-level KIs emphasised that despite some isolated cases[61], there is a general lack of resources channeled through the districts to support DLGs and RWCs.

Furthermore, district-level KIs reported that both government and development partners channel insufficient funding directly through the DLGs, hindering their involvement in the CRRF. The national-district (and inter-governmental) disconnect was additionally illustrated by several incidents of visits to, and activities in, refugee settlements by national-level actors (including development partners, UN agencies, NGOs and MDAs) which by-passed the DLGs, thereby limiting their ability to manage and prioritise the response.

Finally, while there are mechanisms for refugees and host communities to register complaints to national-level actors, some refugee and host community FGD participants indicated that these complaints are not always followed up.

Sub-national coordination mechanisms

In June 2020, an MoU was signed between the MoLG and UNHCR, laying out the principles for strengthened coordination of the refugee response in RHDs through convening regular inclusive coordination meetings with all relevant partners. District-level KIs noted the existence of functional district-level inter-sectoral and sectoral coordination mechanisms between DLG, OPM, and implementing partners, resulting in a largely well-coordinated response. These mechanisms include monthly sectoral meetings, and information sharing with refugee communities through local leaders.

However, despite this, challenges remain. Several district-level KIs expressed a lack of clarity about mandates, roles and responsibilities in relation to the implementation of the CRRF at district level, and whether this should be spearheaded by OPM or the DLGs, which, several KIs noted, has resulted in a difficult relationship between DoR and DLGs in some districts. This challenge was already identified in the CRRF's Issue Paper on Strengthening District Coordination in 2018, which argues that "attempts to improve coordination [between local government and OPM representatives] within the existing legal framework are often hampered by the lack of adherence to roles and responsibilities enshrined in the legal framework and complacency of some leaders. As a result, the level and modalities of collaboration vary from district to district".[62] Although several district-level KIs have indicated an improvement in relations between OPM representatives and DLGs, they note that the nature of these relationships still varies between districts.

Moreover, several KIs raised concerns about the genuine representation and involvement of lower tiers of government (LCs, parish/sub-county level) in RHDs, hindering their sense of ownership and empowerment. In particular, there are concerns about the inclusion of sub-counties that do not host refugee settlements but whose facilities might be used by refugees (e.g. referral hospitals). Interviews at national and district level indicated a lack of awareness

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[60] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*; pillar 2, output 2.2
[61] These include reports of direct funding for Koboko district, as well as about 1,5 million USD channeled by UNICEF through the financial systems of districts, see UNICEF (2021) *Documentation of UNICEF Uganda Country Office (UCO) Contribution to the Comprehensive Refugee Response Framework (CRRF)*.
[62] OPM (2018) CRRF Secretariat: Strengthening District Coordination. *Issue Paper #1*, p. 5.

of the nascent Parish Development Model, which would further empower lower levels of government, and its articulation with the CRRF in RHDs.

While efforts have been made to ensure the representativeness of different stakeholder groups in district-level coordination, participants in the FGDs indicated that the host and refugee communities are insufficiently involved in the different platforms and meetings, which hinders their sense of awareness, ownership, and engagement in the CRRF. Despite the existence of the REF and their representation at the Steering Group (see Refugee Engagement Forum), refugees are rarely included in 'everyday' decision-making at district level, according to the FGD participants.

In addition, KIs raised particular concerns related to the growing yet insufficient representation of local and national NGOs, youth, persons living with disabilities and older persons in sub-national coordination mechanisms.

Coordination between government and international actors

Key to enhanced coordination between the government and the international community are the Steering Group and the CRRF Secretariat, to which staff are seconded by both parties (see 3.1.3. CRRF Institutions). KIs identified several other good practices that further enhance coordination: the co-leading of different working groups (in the absence of a UN-activated Cluster coordination system) by the government and international partners; the existence of a DLG Support Group under the DPG; Memorandums of Understanding (MoUs) between OPM, DLGs and partners at district level; the provision of capacity development and expertise to districts (a prime example being the GIZ RISE project); and the provision of (limited amounts of) funding through the government by some development partners and UNHCR.

However, despite the above, and the initial strong interest in and commitment to the CRRF following its adoption in Uganda in 2017, the relationship between the government and the international community remains beset by a number of challenges. KIs have reported prevailing difficulties in the relationship between development partners and the government, which KIs indicate are driven by ongoing mistrust among development partners regarding governance issues, making them reluctant to channel funding directly through the government. At the same time, there appears to be limited alignment and use of the different plans (SRPs, NDPs) by donors, reportedly due to a combination of previously earmarked funding, individual donor priorities, limited flexibility and incompatible timelines. Additionally, the different DPG Working Groups do not seem to be well-aligned with the Government-led Working Groups under NDP 3. A notable exception is funding channeled through the World Bank's IDA Window for Host Communities and Refugees, which is reportedly provided on-budget and is aligned with government priorities, including the SRPs (see Resource mobilisation).

According to KIs, all this is sometimes interpreted by Government representatives as disengagement of development partners and non-adherence to commitments made. Several KIs among development partners also raised concerns over a lack of ownership by the Government: these concerns include the continued reliance on UNHCR for the financing of and technical support to the DoR, and on the development partners and UNHCR for the financing and staffing of the CRRF Secretariat, as well as a reported lack of ownership and commitment of certain line ministries to the corresponding SRPs.

In addition, there are differential understandings among government and the international commmunity about the definition and vision for an "exit strategy" vis-à-vis the long-term commitments of international actors, be they development partners, UN agencies or NGOs. This is in turn related to a lack of guidelines on the transition of services to government ownership (see Planning and policy gaps and Pillar 2: Emergency response and ongoing needs). KIs from both government and humanitarian actors reiterated that the CRRF should

not be regarded by development partners as a de facto exit strategy, but that there are ongoing responsibilities under the CRRF and GCR commitments to burden-sharing. In addition, there is a need to more clearly articulate the vision related to the changing roles and responsibilities of the international community in the CRRF, with a likely increased focus on financing (development partners), as well as technical support and capacity development (by UN agencies and NGOs), shifting away from direct implementation of activities (though a certain involvement in the provision of assistance to cover unmet humanitarian needs may still be required).

As noted in the section on National-district coordination, district-level KIs indicated that there is insufficient engagement between international actors and DLGs, and between international actors and local communities. This encompasses a lack of information sharing with DLGs and community leaders about projects, insufficient bilateral engagement between development partners and DLGs, and a consideration that NGOs can be aloof and non-accountable to their different district-level constituencies.

Humanitarian-development coordination

As noted in section 3.1.1. Planning and policy processes, enhanced humanitarian-development coordination, under a nexus approach, is fundamental to the CRRF. The approach aims at engaging development actors in RHDs, advancing the inclusion of the host community in humanitarian programming, and building towards the eventual transfer of services and infrastructure to government ownership (while maintaining donors' financial commitments).

According to some interlocutors, the CRRF has brought increased awareness, buy-in, and a certain 'mindset change' among humanitarian actors, including UNHCR, about the need for more sustainable and longer-term interventions. However, while humanitarian and development actors meet in coordination fora such as the RHPG and DPG, there is a risk of duplication of discussions, as "the same people often talk about the same issues in two different meetings", according to one KI.

At sector level, KIs reported positive relations between some of the RRP sector working groups and certain SRP working groups or secretariats, notably education. Humanitarian actors are increasingly engaged with host communities; development partners increasingly integrate refugees in their country plans (in line with NDP 3). In addition, there are also several examples of humanitarian and development sectors working together (e.g., UNHCR and the World Bank); this is further discussed in section. However, despite this common engagement, some challenges remain regarding the cooperation between humanitarian and development actors – which are by no means specific to the CRRF. For instance, the nexus approach is not always well-reflected within donor organisations, with humanitarian and development funding often coming from different funding streams. Humanitarian and development actors pursue different ways of working, at different speeds and across different timelines, and they tend to take different perspectives (development actors often looking at the needs of 'systems', with humanitarian actors looking at the needs of individuals). Nevertheless, leveraging their comparative advantages is essential for the successful roll-out of the CRRF.

Several KIs from humanitarian organisations made the point that in their refugee programming they have long addressed both humanitarian and development needs in a holistic manner, leading them to question the "false dichotomy" of the humanitarian-development nexus. There are however divergent views on the role of humanitarian actors in the CRRF: some claim that humanitarian actors should focus solely on the first two pillars. In fact, the Jobs and Livelihoods SRP identifies no particular role was identified for humanitarian partners, which were not mentioned as part of its summary of stakeholder roles and responsibilities.[63]

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[63] Ministry of Gender, Labour and Social Development (2021), *Jobs and Livelihoods Integrated Response Plan for Refugees and Host Communities.*

Other KIs, however, question the extent to which development actors have thus far addressed needs in RHDs, obliging the humanitarian actors to remain engaged in the provision of basic services (water, health, education) and longer-term livelihoods support, at least until development partners increase their engagement. There is a particular concern among humanitarian KIs that the CRRF's focus on longer-term development interventions has led to humanitarian needs being deprioritised, contributing to reduced humanitarian funding (see 3.1.4. Resource mobilisation and tracking and Pillar 2: Emergency response and ongoing needs), and leading to increasing unmet emergency needs in refugee settlements.

Private sector engagement

Most KIs considered the private sector to be a vital element in ensuring the increased and sustainable operationalisation of the CRRF in Uganda. The private sector is formally represented in the CRRF Steering Group by the Private Sector Foundation Uganda (PSFU), though they are not considered to be a proactive player in that forum (see CRRF Steering Group). There have been several isolated attempts to enhance the involvement of the private sector, including their consultation in the development of the Sustainable Energy and Jobs and Livelihoods SRPs. In addition, there are a number of ad-hoc good practice cases, such as private sector roundtables organised in a number of RHDs to identify opportunities for refugee inclusion in the workplace and the involvement of the private sector in the creation of some of the DDPs. However, overall, there has been limited involvement of the private sector in coordination mechanisms, at national and at district level, with no systematic engagement in planning and coordination mechanisms.

The private sector is increasingly engaged in RHDs as financial service providers for cash transfer programmes implemented by WFP and NGOs.[64] District-level KIs provided numerous other examples of the presence of the private sector in their districts, including in telecommunications, private schools and clinics, agricultural inputs suppliers, agricultural processing and hospitality – but thus far there has been little traction in terms of systematic and large-scale investment in RHDs. Instead, private sector individuals or companies are mostly involved as contractors for the government or the international community. Yet real private sector engagement will need to go beyond the mere outsourcing of service delivery, and will require flexible financing arrangements, cross-sectoral partnerships and the better collection, provision and sharing of information.[65]

The lack of effective demand, plus remoteness and logistical challenges as well as a complicated regulatory environment, were reported as discouraging private sector actors from investing at scale in refugee settlements, as it is simply not seen as sufficiently profitable. On this latter point, some KIs raised concerns on the potential misalignment between the private-sector's profit-making objective and humanitarian principles, notably in terms of child protection and exploitation of a vulnerable labour force – implying the need for better regulation of the private sector.

Ultimately, as mentioned in Planning and policy gaps, interlocutors emphasised the need for a well-developed Private Sector Engagement Strategy. KIs suggested that this strategy should not only be developed with the 'traditional' stakeholders around the table – government actors and the international community, but there should be further broad consultation with private sector actors such as the Federation of Uganda Employers, the PSFU, local business and other small- and micro-business organisations and associations that may already exist within the settlements. KIs stressed that it is vital that the private sector is fully consulted and

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involved, and endorses the Private Sector Engagement Strategy before it goes to the CRRF Steering Group for adoption.

International and regional engagement

IGAD is the leading regional organisation in East Africa, with the stated mission of achieving food security and environmental protection, promotion, and maintenance of peace and security and humanitarian affairs, and economic cooperation and integration in the IGAD region.

In 2017, IGAD issued the Nairobi Declaration on the Somali Refugee Situation 2017, subsequently expanded across East Africa as the regional application of the CRRF; this was followed by the Djibouti Declaration on Refugee Education (2017), the Kampala Declaration on Jobs and Livelihoods (2019) and the IGAD Support Platform (2019), aimed at addressing the objectives of the GCR in the IGAD region.

The extent to which refugee response actors in Uganda have been able to leverage IGAD's broader regional engagement framework – in terms of technical support or financing - is unclear. However, the Djibouti and Kampala Declarations provided a model for the development of the corresponding SRPs in Uganda. There does not seem to have been significant engagement on the CRRF with the African Union, but the East African Community is reportedly developing a Regional Refugee Management Policy, and there have also been a number of isolated international workshops and meetings relevant to the CRRF such as the first Africa Private Sector Forum on Forced Displacement (2021) and regional meetings of key UN Agencies (UNHCR, UNICEF).

3.1.3. CRRF Institutions

CRRF Steering Group

Following the launch of the CRRF in 2017, a CRRF Steering Group and a supporting Secretariat were established. The Steering Group is the main decision-making body for the implementation of the CRRF in Uganda and the key national institution for the engagement and coordination of different stakeholder groups. Co-chaired by the OPM and MoLG, the CRRF Steering Group comprises 38 government and non-government stakeholders, ensuring national and district-level representation from OPM, MDAs, as well as donors, UN agencies, NGOs, the private sector, and refugee representatives as well as district authorities. The Steering Group meets on a quarterly basis to make decisions about the roll-out of the CRRF, which are then enshrined in minutes that are distributed to each stakeholder group. The ToR of the Steering Group are annexed to the Strategic Direction.

The Steering Group is appreciated by many KIs as a unique high-level, and inclusive forum, in principle providing space for a broad range of stakeholders, aimed at encouraging a sense of joint ownership and common vision, harmonising approaches across sectors and actors, and promoting overall alignment of government, development, and humanitarian interventions at both national and district level. It is the only forum that brings all the different stakeholders together in one room, with senior-level participation from government, and with decision-making authority. As such, the Steering Group theoretically provides an opportunity for advocacy from representatives of both international and national NGO communities, as well as refugee populations (through the REF) and host communities (through DLGs). All this is in line with the Steering Group's ToR.

The Steering Group members also undertake advocacy, communication, and resource mobilisation activities at regional and global level, including through the IGAD Support Platform, established in response to the GCR, and associated to the 2017 Nairobi Declaration on the Somali Refugee Situation. Steering Group members also represented Uganda at the 2019 Global Refugee Forum in Geneva, showcasing Uganda's progress in CRRF

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implementation and attracting significant financial pledges – over $170 million of ongoing and fulfilled financial pledges[66]. Again, these activities at regional and global level are in line with the Steering Group's ToR.

The analysis of the Steering Group's ToRs, as well as the status of the implementation of different workstreams, as obtained from KI interviews, work plans and annual reports, highlights several points in the Steering Group's ToR that still require further attention. For example, the Steering Group should monitor the status and progress of funding of the CRRF, as well as guide the development and implementation of a resource mobilisation strategy. In particular, it should lead on resource mobilisation for the implementation of the SRPs and ensure its appropriate alignment and support the monitoring of the use of funds under the Government-led financial tracking mechanism. It should identify mechanisms to establish a multi-donor trust fund and oversee its operations. The ToR also specify that the Steering Group ensures that the CRRF Communication Strategy is funded and properly implemented, that a knowledge management hub is established in the CRRF, and that goodwill ambassadors are appointed. Most of these issues were discussed in different Steering Group meetings through 2020 and 2021 and were included in the 2021 and 2022 Annual Workplans of the CRRF Secretariat, but there appears to have been slow or insufficient progress in their implementation.

In 2018, the CRRF Steering Group adopted guidelines to strengthen district coordination. DLGs shared their appreciation for the sharing of documentation about the Steering Group meetings in the districts. Several KIs appreciated the former practice of holding biannual Steering Group meetings at district level, with corresponding field visits at settlement level. Curtailed due to COVID-19, many KIs stressed that these meetings and visits should be reactivated when the situation allows.

Prior to the Steering Group meetings, each stakeholder group (MDAs, REF members, NGOs, DPG members) coordinate their respective inputs and priorities, and the representatives at the Steering Group provide feedback about the meeting to their stakeholder group after the quarterly meetings. The depth of these consultations varies; while there seems to be a relatively high level of consultation within the REF and among DPG members, including through meetings, consultations are less extensive among international NGOs (where it seems limited to email communication) and MDAs (which tend to operate in silos, although the inter-sector dialogues may change this). That said, the international NGO and LDPG representatives do coordinate to ensure common messages to the Steering Group. There is limited consultation among DLGs prior to the Steering Group meetings, though the proposed District Engagement Forum may change this (see District Engagement).

While some KIs noted a recent improvement in the organisation of Steering Group meetings, many highlighted challenges related to the agenda, the preparation and depth of discussions, and the relevance and follow-up of decisions taken. According to KIs, Steering Group meeting agendas and corresponding documents to be discussed at Steering Group meetings are frequently shared late, allowing insufficient time for participants to consult and prepare input. Moreover, agendas are reportedly often packed and sometimes hijacked by long presentations which taken together do not always allow time for meaningful discussion. The introduction of joint, harmonised reporting of SRP updates by the MDAs (instead of on each individual SRP), through the inter-sector dialogue process, was appreciated in this regard, and fulfils the ToR's requirement to monitor the status and progress of CRRF plans and provide recommendations.

The Steering Group's co-chairing by OPM and MoLG was widely appreciated by KIs as a positive step towards balancing the potential over-dominance of OPM, and ensuring broader buy-in across government at both national and district level. Nevertheless, KIs indicated the

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[66] OPM (2022) *CRRF Annual Report 2021.*

importance of ensuring an appropriate and balanced level of participation and representation of stakeholders. High-level ministerial participation is welcome, but is not always matched by corresponding levels from development partners and results in insufficient space for (and attention to) REF members and DLGs to raise their concerns, or to highlight their achievements. In this context, several KIs advocated for a dedicated slot for refugee representatives at the Steering Group meetings (see Refugee Engagement Forum).

Some KIs identified a divide between the political perspectives of senior government representatives and technical interests of other participants which can be difficult to bridge in the meetings. One solution to this might be the establishment of a technical-level sub-group attached to the Steering Group, to focus on specific technical issues. There is also concern that static, permanent representation of different stakeholder groups, particularly the DLG and UN, is not sufficiently representative of their broader constituencies, with attendees representing 'themselves' rather than their broader stakeholder group. Finally, there is reportedly a lack of engagement or attendance from the PSFU, a key potential stakeholder in the implementation of the CRRF in RHDs.

All this inhibits genuine engagement in the Steering Group meetings and identification of concrete outcomes and next steps, leading to insufficient continuity or follow-up of recommendations and decisions between Steering Group meetings.

CRRF Secretariat

Since its establishment in 2017, the CRRF Secretariat has played a crucial role in the development and roll-out of the CRRF in Uganda, pursuing coherence across the different components to ensure a more robust comprehensive response in the RHDs. It has developed strong convening power, bringing together different stakeholders through highly consultative and inclusive processes, supporting the Steering Group, and ensuring momentum between its meetings, driving the development of the SRPs, and developing the NAPs and Strategic Direction 2021-2025.

In the early days this seems to have been a somewhat ad-hoc process ("building the plane as we were flying it" in the words of one KI), relying on the drive and energy of a small coterie of high-calibre staff, largely seconded from OPM, international organisations and development partners. The technical staff now numbers 13, comprising 10 national staff (mostly secondees from OPM) and 3 international secondees / placements; the international staff play a key role in forging links and coordination with the wider international community.
Many national-level KIs noted the legally ambiguous status of the Secretariat, allowing it to be continually challenged by the DoR, Uganda's legally-mandated agency for refugee response; there is a lack of understanding and consensus among KIs on the hierarchical relations and reporting/coordination lines between the Secretariat and the DoR.

Since its inception, the Secretariat has been housed within the OPM, but outside of the DoR; this has been challenged by the DoR and some humanitarian KIs who consider that it separates the policy and operational functions – but regarded as appropriate by many other KIs. Outside of the DoR, KIs generally regarded the position of the Secretariat as appropriate; the housing of the Secretariat outside the DoR was a deliberate decision, encouraged by the development partners, to ensure a degree of distance as the DoR was at the time considered to be plagued by governance issues. The DoR was also mandated specifically for the refugee response, and was heavily reliant on the support of UNHCR, whereas the Secretariat was charged with delivering on the broader ambition of the CRRF, envisioning the inclusion of the host communities and increased long-term engagement of development partners and MDAs. A small number of KIs considered that the Secretariat should be housed outside of OPM, to ensure its full independence.

Several KIs also pointed out an apparent hierarchical contradiction in having the DoR, the mandated agency for refugees, headed by a Commissioner, but the Secretariat headed by a higher-level Director. This physical, functional and hierarchical separation of the CRRF Secretariat has never been fully accepted by the DoR, reportedly leading to deep-rooted and ongoing tensions between the two entities. That said, with recent changes in leadership at both the DoR and the Secretariat there are encouraging signs that this situation is improving. The Secretariat is guided by a ToR, which is embedded in the Strategic Direction. However, it comprises just six short bullet points (though with a specific ToR per staff position). Given the wide-ranging expectations among KIs of what the Secretariat should be and do, as well as the limited information in the Strategic Direction, ToR seems insufficiently developed, and there is a lack of awareness among KIs of the Secretariat's tasks and responsibilities.

Each year, the Secretariat develops an Annual Work Plan and provides quarterly updates on progress towards the work plan to the Steering Group; however, as noted in the Steering Group section above, there has been slow or insufficient progress in the implementation of the Annual Workplan (see CRRF Steering Group). The 2021 Annual Workplan included the development of a National Engagement Strategy, the finalisation of the Private Sector Engagement Strategy, taking forward the Localisation Agenda, finalising the SOPs for research in the RHDs, and (addressing) Financial Tracking – all these were cited as having been rolled over as uncompleted priorities from 2020[67], yet they all remain unfulfilled.

The development of a National Engagement Strategy, aimed at improved awareness and buy-in of CRRF stakeholders, and inter-institutional relationships and coordination, was included in the Secretariat's 2021 Annual Workplan (but not in the 2022 version) and in the NAP 2021-2022 Workplan; this has yet to be achieved, and may have been hindered by the ongoing vacancy of Engagement Advisor position in the Secretariat.

The finalisation and adoption of the Private Sector Engagement Strategy (see Planning and policy gaps, and Private sector engagement) was included in the Secretariat's Annual Workplans 2021 and 2022 Annual Workplan[68], the NAP 2021-2022 Workplan, discussed at the 12th and 13th Steering Group meetings, and noted as an ongoing priority in the 2020 CRRF Annual Report - but was not addressed in the 2021 CRRF Annual Report. The strategy is still to be finalised, although the initial Task Force has reportedly been re-constituted.

Addressing the Localisation Agenda (see Planning and policy gaps) was also included in the Secretariat's Annual Workplans 2021 and 2022[69] and the NAP 2021-2022 Workplan. The Localisation Taskforce has been constituted, but more remains to be done towards the development of a structured framework, or strategy.

The Secretariat's Annual Workplans 2021 and 2022 included the development and finalisation of SOPs for research studies in the RHDs[70], and the 2020 CRRF Annual Report identified it as a priority for 2021. This issue was also discussed at the 7th and 12th Steering Group meetings; while the latter meeting recommended the constitution of a specific inter-agency Task Force for the purpose, it should be noted that the development of such SOPs did not gain much traction among the KIs interviewed on the matter.

The Secretariat's Annual Workplans 2021 and 2022[71], the Strategic Direction and the NAP 2021-2022 Workplan all identified the need for a "long overdue"[72] financial tracking framework to be developed under the stewardship of the MoFPED; this should include tags, or markers, for actions benefiting refugees and host communities. It was further discussed at the 14th and

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[67] OPM (2020) *Annual Workplan 2021: CRRF Secretariat*, p. 2
[68] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 3, output 3.3
[69] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 3, output 3.4
[70] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 3, output 1.4
[71] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 1, output 2.1
[72] OPM (2021) *CRRF Strategic Direction 2021-2025.*

15th Steering Group meeting. The CRRF Annual Report 2021 identifies this as an ongoing priority, to be re-discussed at the next Steering Group meeting (16th). The need for a single, systematic, complete and transparent financial tracking mechanism was raised by multiple KIs, and is addressed elsewhere in this report (see Resource tracking, and V. **RECOMMENDATIONS**).

Both the 2021 and 2022 Annual Workplans, as well as the workplan embedded in the NAP 2021-2022, include the development of a Resource Mobilisation Strategy[73]; while examples of overall efforts at resource mobilisation are highlighted in this report (e.g. the Solidarity Summit in 2017, attendance at the GRF 2019 and High-Level Official Meeting 2021, engagement with IGAD – see section 3.1.4, there is no formal strategy as such, and it is not mentioned in the 2021 CRRF Annual Report. Linked to this, the ToR of the Steering Group and the Strategic Direction 2021-2025 refer to the establishment of a multi-donor trust fund; however, there is no mention of this in the Secretariat's 2021 and 2022 Annual Workplans, the two CRRF Annual Reports 2020 and 2021, the NAP 2021-2022, or recent Steering Group meeting minutes.

Furthermore, both the 2021 and 2022 Annual Workplans, as well as the NAP 2021-2022 Workplan and the ToR of the Steering Group, identify the need for an online knowledge management platform[74], accessible to the public. The 2021 Annual Workplan actually identifies a website – ugandarefugees.org (which is also referenced in the NAP 2021-2022) – but this does not provide much specific information about the CRRF itself. Finally, the 2022 Annual Workplan includes the operationalisation of the Settlement Strategy[75], which needs to be finalised and adopted by the Steering Group (see Planning and policy gaps).

The preceding paragraphs indicate a certain mismatch between the ToRs of the Steering Group and Secretariat, the activities and outputs foreseen in different work plans, and the expectations among stakeholders of what the Steering Group and Secretariat should be or do. This implies the need for more realistic and prioritised commitments and timelines, taking into account the available capacities and resources.

Several KIs indicated a need to review the structure, role, and responsibilities of the Secretariat as the CRRF implementation evolves. There is a perceived loss of momentum and direction according to a number of KIs, and lack of effective leadership; to maintain its relevance, the Secretariat cannot stay static. Several KIs considered that it should be downsized, or adapted towards new challenges; for instance, additional sector plans require additional expertise (possibly "de-centralised" into line ministries); new approaches (NDP 3) require new competencies. KIs identified multiple skills and competence gaps and needs within the Secretariat: resource mobilisation skills (not a specific post in the Secretariat's ToR, but falling under the responsibility of the Communications Team), M&E skills (not in the initial Secretariat structure, a position has been approved by the Steering Group but remains vacant), stakeholder engagement (currently a vacant post in the Secretariat), gender and protection awareness (with a need for a gender expert at the Secretariat), and an increased focus on district implementation. The need for capacity and skills development of staff was also noted by KIs within the Secretariat.

Multiple KIs, particularly from the international community, raised concerns on the sustainability of the Secretariat; most of the key positions, not only the secondments of international partners, continue to be financed by international actors (in particular UNHCR). It is within the ToR of the Steering Group to ensure that the Secretariat is adequately resourced; there are however concerns that senior-level Government staff are deployed to the Secretariat as an add-on to their existing functions and thus are not committed full-time and

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[73] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, pillar 1, output 2.1
[74] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, pillar 6, output 4.1
[75] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, pillar 3, output 3.2

not all staff were competitively recruited, which has had effects on the level of skills and expertise present at the Secretariat. [76]All this has caused some KIs among the international community to question the financial commitment and ownership of the CRRF Secretariat by the Government. In addition, some KIs argued that, on the government's side, there should be a greater involvement of MDAs beyond OPM, with positions seconded by other MDAs as well. The mooted recent creation of a Deputy Director position at the Secretariat, sourced from MoLG, may go some way towards alleviating this concern.

National and district-level KIs highlighted a need for more communication and awareness-raising by the Secretariat with all key stakeholders; district-level KIs recommended renewed field visits by the Secretariat, and more robust engagement at the district level.

Refugee Engagement Forum

To ensure the representation of refugees in all planning processes and decisions which directly affect them, RWCs have been established in each refugee settlement. At national level, refugee leaders from each settlement are brought together in the REF, an innovative and highly-progressive initiative, which in turn participates in the CRRF Steering Group.

A concept note for refugee engagement was first developed in 2018, following a field consultation by OPM and UNHCR, and a first version of the REF – the Refugee Advisory Forum – was created in October 2018 to ensure the representation of refugee voices at national level.[77] The Refugee Advisory Forum, which was attended by 75 refugee leaders, was later changed into the REF in 2019. The REF limited the number of participants to 37, which was considered more feasible and allowed for more in-depth discussions, while still maintaining a balanced representation.

The REF meets four times a year, mirroring the calendar of the CRRF Steering Group.[78] The REF Task Force, co-chaired by OPM DoR and UNHCR, supports the REF in the organisation of the quarterly REF meetings, as well as on matters including resource mobilisation, stakeholder coordination and information sharing.[79] An overview of the roles and interactions of the REF structure has been visualised in Figure 3. REF support structure and feedback mechanism.

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[76] OPM (2021) Minutes of the 14th CRRF Steering Group Meeting held on 6th October 2021, at Golf Course Hotel, Kampala
[77] U-Learn & the REF Task Force (2021) Refugee Engagement Forum in Uganda: Good Practice
Study, available here, p. 8.
[78] Ibid, p. 8.
[79] Ibid, pp.9-10.

Figure 3. REF support structure and feedback mechanism.[80]
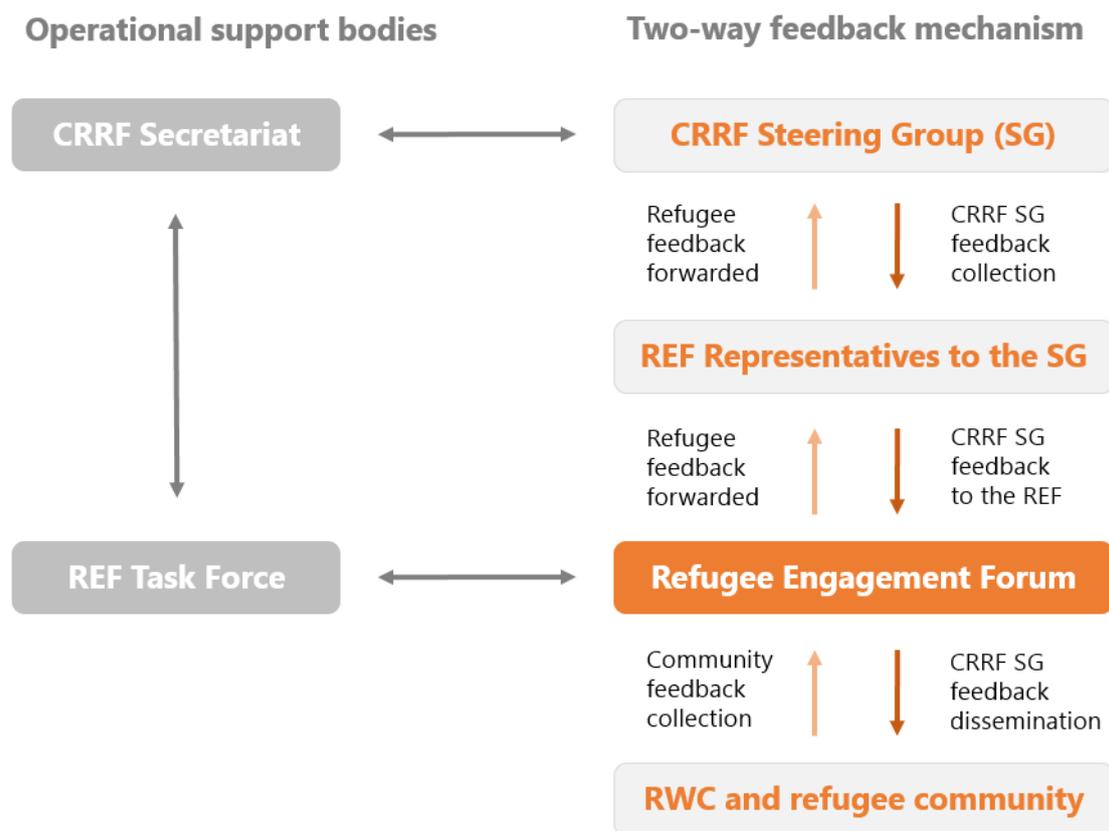
The participation of REF members in the Steering Group meetings is widely lauded among KIs, allowing refugee participation at the highest decision-making body of the CRRF and aimed at promoting a sense of ownership of decisions made; this practice is possibly unique to Uganda. To ensure genuine representation of all refugees from RHDs at the Steering Group, the two participating REF representatives (one male, one female) are elected by the REF members and serve fixed terms.

The *REF Good Practice Study*[81], conducted by U-Learn and the REF Task Force in 2021, identified six drivers behind the success of the REF in Uganda:

1. **The REF builds on existing structures**, in particular the RWC structure, which provides the REF with the legitimacy to speak on behalf of refugee populations.

2. **The REF intentionally promotes diversity and inclusion** by reserving leadership positions to specific groups, aimed at ensuring an adequate reflection of refugees by gender, country of origin, settlement, and age.

3. **The REF fosters interpersonal relationships**, as it brings together a diverse community of refugees across refugee settlements, promoting a sense of unity among refugees.

4. **The REF structures are adaptable and flexible,** for example through the appointment of substitute REF representatives and the switch to virtual meetings in the context of COVID-19.

5. **The REF has allowed for ongoing learning and adaptation**, which has resulted in incremental improvements throughout the years.

6. **The REF has been supported across stakeholder groups** from the outset, including staff time and financial support, which has been essential for the development of the mechanism.

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[80] This figure is an adapted version of the visualisation of the U-Learn & REF Task Force (2021) *Good Practice Study,* p. 9.
[81] Ibid.

While KIs generally emphasised the successes and good practices of the REF, several challenges were also highlighted. For example, although REF members are generally seen as representative of the refugee population,[82] some KIs and refugee FGD participants still raised some concerns related to the representation of persons living with disability, youth, older persons, and persons with special needs.

In addition, while REF representatives participate in Steering Group meetings, they are reportedly not always allotted sufficient time and space for their voices to be heard; suggested solutions to this included the establishment of a standing agenda item for the REF, or an annual Steering Group meeting specifically focused on the REF.

Interviews with REF KIs, as well as refugee FGDs, suggest that there is insufficient follow-up and documentation on the outcomes of issues raised at the Steering Group by the REF. Additionally, there are concerns about the rigour and quality of the REF's structured feedback from the Steering Group meetings to the refugee communities they themselves represent. KIs also raised that there is currently insufficient engagement among REF members in between Steering Group meetings, leading to lack of continuity in addressing key issues.

REF participation in other coordination platforms and with bilateral partners appears to be generally recognised as a good practice. For example, REF representatives have participated in consultations related to the National Plan of Action (2021-2022)[83] and the RRP. That said, KIs indicated that it does not happen sufficiently regularly, and REF participation could be standardised to enhance understanding of refugee concerns. While district-level KIs appreciated refugee representation in district-level meetings with local authorities and community representatives, some KIs considered that refugee representatives should be better involved in the development of the DDPs.

KIs shared that institutional funding for the REF is insufficient to allow regular and systematic engagement in coordination fora and meetings at both national and district level; participation would be enhanced with better access to technology and transport.

District Engagement

The CRRF Steering Group currently includes two District Chairpersons and three CAOs, representing district-level and host community issues, as well as a MoLG focal person, in addition to the position of the MoLG as co-chair of the CRRF Steering Group. Questions have been raised as to their genuine representativeness, as there is currently no rotation of these representatives, and therefore the same five people systematically participate at each Steering Group meeting, with no 'common voice' on behalf of DLGs.[84] The creation of a District Engagement Forum has therefore been proposed; it has not yet been formally adopted, but is included in the CRRF Secretariat's 2022 Annual Workplan[85]. The District Engagement Forum aims to achieve the following results[86]:

- Establish a link between CRRF National Arrangements and RHDs, and amplify the voice of RHDs in these Arrangements;

- Ensure democratic representation of DLGs from RHDs in the CRRF Steering group by election and rotational representation;

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[82] Ibid, p. 11.
[83] Ibid, p. 13.
[84] OPM (2020) Strategic Direction and National Plan of Action: District Engagement and Coordination. Presentation to the CRRF DPG Sub-group meeting, 25 November 2020, slide 13.
[85] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 2, output 2.1
[86] OPM (2020) Strategic Direction and National Plan of Action: District Engagement and Coordination. Presentation to the CRRF DPG Sub-group meeting, 25 November 2020, slide 14.

- Provide a platform for the exchange of challenges, good practices and lessons learnt among DLGs from RHDs;

- Support the organisation of field visits by the CRRF Steering Group.

KIs largely agreed on the need to formalise and institutionalise the District Engagement Forum; as for the REF, continued funding will be required for this to ensure its effective roll-out, e.g. to facilitate the organisation of quarterly meetings and to support the communication and feedback mechanisms between the Steering Group and the local authorities.

Currently, CRRF structures, such as CRRF Steering Groups, Secretariats or focal points are not established in all districts to mirror the CRRF architecture in Kampala. Several district-level KIs have identified a need for continued support to the development or strengthening of CRRF-relevant institutions at the district level, ranging from the availability of a 'CRRF focal point' for each district to the establishment or strengthening of district-level CRRF Secretariats to help guide local authorities in the implementation of the CRRF. For those districts where district-level Secretariats were established, however, concerns were raised related to their practicability and functionality.

3.1.4. Resource mobilisation and tracking

Resource mobilisation

Following the launch of the CRRF, the Government of Uganda invested in resource mobilisation by organising the Solidarity Summit in June 2017, and participating in events such as the Global Refugee Forum in 2019, which drew significant pledges for Uganda. However, there is still no formal resource mobilisation strategy, despite this being in the ToR of the Steering Group, and the 2021 and 2022 Annual Workplans[87] of the Secretariat.

Overall development funding has since increased, both in terms of the number of donors and the amount of financing - but there is overwhelming concern, expressed by a wide range of stakeholder groups at both national and district level, that this has been insufficient to fulfil the ambitions of the plans and policies developed under the CRRF. The most recent figures in the GCR Indicator Report 2021 show that Uganda was the eighth largest recipient of bilateral Official Development Assistance (ODA) in the period 2018-2019, climbing from approximately $200 million in 2018 to $300 million in 2019, at which point there were 22 donors of bilateral aid[88]; nevertheless, this only accounted for 3% of total ODA to refugee situations worldwide[89], despite Uganda hosting approximately 5% of the world's refugees at that time[90]. Numerous KIs stated that the amount of additional funding generated had been less than anticipated, despite the commitments and pledges made, which has led to a certain degree of frustration and disillusionment among the government and may even undermine the sustainability of Uganda's refugee-hosting model.[91]

KIs also noted that additional funding was neither sufficiently predictable nor sustainable to allow for the implementation of a strategic approach to development programming. In particular, there has been insufficient long-term development funding to the SRPs, and to ensure the sustainability of the envisaged transition of infrastructure and services (water, schools, health centres) from international community to government ownership. Multiple KIs emphasised that the GCR's emphasis on international burden-sharing does not only relate to the provision of resettlement opportunities, but also requires long-term predictable funding for

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[87] OPM (2021) *Annual Workplan 2022: CRRF Secretariat*, Pillar 1, output 2.1
[88] UNHCR (2021) *Global Compact on Refugees: Indicator Report.* Available here, pp. 25-27
[89] Hesemann, Desai & Rockenfeller (2021) Financing for refugee situations 2018-2019, OECD Publishing, Paris, p. 21.
[90] Ibid, p. 22
[91] According to KIs, as well as Research & Evidence Facility (2020) *Comprehensive Refugee Responses in the Horn of Africa: Regional Leadership on Education, Livelihoods and Durable Solutions.* London: EU Trust Fund for Africa Research and Evidence Facility,

this transition. This was also noted by a recent study on the implementation of the GCR, which calls for more predictable, long-term funding, as "GCR approaches require more – not less – funding when a combination of humanitarian, catalytic, transitional and development financing is needed."[92]

Following the adoption of the CRRF in Uganda and the launch of the different SRPs, there were high expectations from the government that additional development funding would be channeled through the MDAs. Government KIs indicated, however, that this has been insufficient. Besides insufficient funding for central government institutions, KIs also highlighted concerns related to a lack of sufficient funding channeled through local government and local NGOs. Many development partners seem to be reluctant to channel resources through the government, and instead may prefer to finance programmes "off-budget", through technical agencies, UN agencies or NGOs. Reasons cited for this include concerns over governance, as well as a perceived lack of technical capacity among MDAs. It should be noted, however, that bilateral donors do provide on-budget support for the CRRF through the World Bank's IDA Window for Host Communities and Refugees, which is aligned with government priorities, including the SRPs, and amounts to $626 million.

Several KIs noted the absence of a functional multi-donor trust fund, which might provide oversight and added confidence for donors to channel dedicated CRRF funding through government counterparts, but concerns were raised by development partners on the added value of such a fund, potential duplication, and whether the complex government arrangements necessary will be commensurate with the resources it would attract.

While the Ugandan government is allocating land and other resources to the refugee response, some KIs noted limited government funding going into the CRRF institutions (in particular the CRRF Secretariat and the SRP Secretariats). Furthermore, while there are some isolated exceptions, DLG KIs generally noted that they do not have influence over central government budget allocations to the districts and DDPs.

At the same time, humanitarian funding is reducing[93], raising concerns about the lack of coverage of emergency needs. According to several humanitarian KIs, this is primarily due to donor prioritisation of other crises in the world, as well as re-prioritisation towards COVID-19 response programmes.

In addition, reduced funding may also be somewhat fueled by the perception that Uganda is a CRRF success story, and therefore less in need of emergency support. For example, the BBC reported in 2016 that "Uganda is one of the best places to be a refugee".[94] In fact, "[showcasing] Uganda's progressive policy and [offsetting] negative narratives about the refugee response in Uganda" was one of the first strategic objectives of the CRRF Communications and Outreach Strategy 2018-2020.[95] In this sense, some KIs pointed out that Uganda may be a victim of its own rhetoric, a sentiment that has been echoed by the International Refugee Rights Initiative, which identified "a tendency to idealise Uganda's model", which is "neither helpful to Uganda nor to other countries that might be looking to emulate Uganda's example."[96]

Resource tracking

While most KIs were confident that the overall amount of development funding has increased, and individual donors were aware of their own financing levels, none of the KIs were able to provide an overview of funding amounts or trends in the context of the CRRF. Furthermore,

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[92] DRC, IRC & NRC (2021) The Global Compact on Refugees Three Years On: Navigating barriers and maximizing incentives in support of refugees and host community, p.4.
[93] An overview of RRP finances since 2018 was shared bilaterally by UNHCR with the CRRF Evaluation team.
[94] BBC (2016) Uganda: 'One of the best places to be a refugee'. BBC News, 13 May 2016.
[95] CRRF (2018) Communications and Outreach Strategy, p. 21.
[96] Hovil (2018) We need a more honest discussion of Uganda's 'model' refugee policies. Refugees Deeply, 22 October.

the different overviews that do exist present markedly different figures. The CRRF Annual Report 2021 reports approximately $970 million of funding in 2018-2019, while the GCR Indicator Report 2021 reports approximately $500 million of ODA (which combines humanitarian and development financing: approximately 60% was humanitarian, 40% development[97]) over the same period.

UNHCR tracks progress against pledges made at the Global Refugee Forum, but this does not capture all financing. There are several parallel reporting mechanisms in Uganda: the Aid Management Platform (AMP) managed by the MoFPED, the Uganda Refugee Response Monitoring System (URRMS) managed by OPM, and ActivityInfo, managed by UNHCR, as well as systems to report against some of the SRPs (for instance, Education, and Water & Environment) and direct reporting to relevant line ministries. This led some KIs to consider that financial tracking mechanisms are in place, but there is no common standard system for reporting and tracking development financing, and no inter-operability between those that do exist. In addition, findings suggest that there is also limited awareness of the government's financial contributions to the CRRF among the international community.

Government interlocutors consider the AMP to be the official platform through which international funding is to be reported, but concerns were raised by development partners about its usability, functionality, and its ability to effectively track off-budget support. A specific tag to track CRRF or refugee-related funding was raised at Steering Group meetings, but this has so far not materialised. In addition, several KIs were unaware of the existence of the AMP.

More generally, several KIs indicated that they are reluctant to report into Government-managed reporting platforms altogether, especially those donors that are financing programmes 'off-budget'. As a result, government reporting forms are not always systematically and fully completed by donors or their implementing agencies. This has in turn led many government KIs to consider that development donors are increasingly non-transparent and therefore non-accountable in their financing. In September 2021, development and humanitarian partners were reminded by the MoFPED of their obligation under the Public Finance Management Act 2015 to report their financial contributions to the AMP.

While development funding is not properly tracked, the level of humanitarian financing appears to be more complete and transparent, as it is consolidated and specified through the RRP and ActivityInfo. However, even these platforms do not capture all funding, and notably, do not include development funding. In addition, in the spirit of the CRRF, the monitoring of the response should move to the government, and for this purpose, the URRMS was created by OPM. However, for the moment, the two parallel systems (ActivityInfo and URRMS) continue to coexist, without much inter-operability between them. This has led to frustration by partners in the response, who are asked to report twice about their activities in two different systems. In addition, some KIs indicated that OPM has never published any information products based on URRMS, which increased the reluctance of some stakeholders to report into this system. It should be noted that there are some ongoing efforts to harmonise the two systems between UNHCR and OPM.

Furthermore, while there are budgeting and planning tools available at district level, KIs indicated that there is no overview of funding at district level, again mostly due to a lack of reporting by both humanitarian and development partners. KIs acknowledged that this lack of accurate and systematic reporting within Uganda needs to be addressed on a priority basis.

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[97] Hesemann, Desai & Rockenfeller (2021) Financing for refugee situations 2018-2019, OECD Publishing, Paris, p. 26

3.1.5. Monitoring and evaluation

As for financial tracking, there are parallel systems to track activities, including URRMS (OPM) and ActivityInfo (UNHCR), with limited inter-operability. KIs pointed to a lack of a commonly adopted system or harmonised framework to measure the impact or progress towards the overall objectives of the CRRF. The broader M&E framework in the Strategic Direction, and the detailed work plan of the 2021-2022 NAP appear to be insufficiently known or used; only one KI mentioned these. It should be noted that at the global level, the GCR indicator framework provides an overview of progress towards the GCR objectives by measuring 15 indicators[98]; the outcomes are published in the *GCR Indicator Report*.[99]

The Strategic Direction M&E Framework is built around the 5 components of the Strategic Direction[100]; across these 5 components, 10 outcomes and 33 indicators are identified. The Framework however is not sufficiently well-developed: its content is relatively generic, its indicators cannot be said to be SMART[101], and the means of verification are not sufficiently rigorous.

The NAP 2021-2022 includes a 5-year Results Matrix and a 2-year Workplan and is strongly aligned to the Strategic Direction. The Results Matrix is built around the 5 components of the Strategic direction, which are immediately grouped into 3 Strategic Priorities: Accountable and Inclusive Coordination Arrangements at National and Sub-National Level (components 1 and 2 combined), Mainstreaming CRRF into national planning (component 3), and Effective burden- and responsibility-sharing (components 4 and 5 combined). The 3 Strategic Priorities are broken down into 10 outcomes, to be achieved by 2025; these are almost identical (4 are slightly more detailed) to the 10 outcomes of the Strategic Direction. The 10 outcomes are then broken down into 22 outputs, to be achieved by (end-)2022, with 4 additional cross-cutting issues identified. The Results Matrix is followed by several pages of narrative which are built around the 10 outcomes and their 5-year timeframe. Although there has been a clear attempt to align the Results Matrix of the NAP and the M&E Framework of the Strategic Direction, the differences in the structure of the two frameworks, as well as the inclusion of a five-year results matrix in the NAP (which covers 2021-2022 only), can be a source of confusion.

The NAP also includes a detailed 2-year Workplan, to achieve the outputs identified in the Results Matrix. This Workplan details 85 deliverables to be achieved by the end of 2022, with quarterly benchmarks, several of which have already been achieved or are part of a regular established process. However, particular attention needs to be given to several of the foreseen outputs and deliverables: these are detailed in V. RECOMMENDATIONS. Notably, the first output of the Workplan foresees the adoption and operationalisation of a Refugee Policy[102]; this however was not referenced in any of the other documentation reviewed or in any of the KIIs undertaken. The elaboration of the next NAP (foreseen to cover the period 2023-2024) and its concomitant Workplan should commence as early as mid-2022 to ensure continuity, and to prioritise and highlight those outputs that require increased attention, energy and financing.

Every SRP set out to develop an M&E framework; however, some have been better developed than others. According to KIs, the M&E framework embedded in the ERP is considered to be particularly well functioning, with clear time-bound deliverables, and financial tracking. The M&E framework for the Water & Environment SRP is currently being developed. As for the

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[98] See UNHCR (2019) Global Compact on Refugees: Indicator Framework.
[99] UNHCR (2021) Global Compact on Refugees: Indicator Report.
[100] Strengthening national arrangements; Enhancing stakeholder engagement and coordination at district level; Mainstreaming the CRRF into national planning to address the long-term impacts of hosting refugees; Fostering regional partnerships; Ensuring international burden- and responsibility-sharing.
[101] Specific, Measurable, Achievable, Realistic, Timely
[102] See output 1.1.1 in the workplan of the 2021-2022 NAP (OPM (2021) *CRRF National Plan of Action 2021-2022*).

Jobs and Livelihoods SRP, the development of an M&E system is foreseen but yet to be financed, and externalised to consultants. Several KIs stressed the need for improved assessment and reporting at sector-level – including the challenge of aligning this with NDP 3; the Inter-Sector Dialogue process, with its common reporting mechanisms, has the potential to better harmonise reporting between the different SRPs.

Many KIs at the district level noted that there is regular supervision and monitoring of activities in the context of the refugee response by OPM and DLGs – but that there is still a need for harmonised standards of monitoring with the inclusion of all stakeholder groups, plus capacity-building and additional budgets to OPM and district sector leads to carry out these monitoring activities. This was also highlighted in a UNICEF lessons learnt document, which notes that the capacity of DLGs "to plan, implement and monitor services for refugees and host communities remains inadequate".[103]

In addition, government KIs highlighted that humanitarian and development partners are not sufficiently sharing information about their activities, leading to a lack of awareness among district authorities about the implementation of the CRRF in their districts. As a result of limited information sharing, activities of implementing partners in the refugee response are not always integrated within district processes of planning, budgeting, monitoring and reporting, which provides a further obstacle to the development and follow-up on district plans.[104]

While several KIs at district level considered that sufficient data or statistics are available for planning purposes, others identified multiple data gaps in assessment and reporting. These included, inter alia, data on refugees in secondary cities, refugee returns and pendular movements, and gender- and age-disaggregated data. KIs also identified a lack of broader joint assessments on issues that are fundamental to the CRRF approach, namely the impact of refugees on hosting districts, and the concomitant host community needs. Several KIs pointed to the limited capacity and engagement of UBOS in refugee data collection through assessment, M&E activities, including verification/profiling exercises – though refugees are included in the national censuses, and while they were included in the Uganda Refugee and Host Communities Household Survey 2018, in collaboration between the World Bank and UBOS[105], refugees were left out of the corresponding survey in 2021.

More generally, KIs pointed out that there are separate systems for assessments of refugees and host communities (e.g., the independent verification and individual profiling of refugees, led by OPM and UNHCR, and the socio-economic survey of Ugandans implemented by UBOS). As needs are assessed differently between the two communities, this might pose an obstacle to the harmonisation of the response in the framework of the CRRF. That said, KIs pointed out that some efforts are made to align the indicators of the assessments between host communities and refugees (e.g. between the individual profiling exercise and the socio-economic survey).

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[103] UNICEF (2021) *Documentation of UNICEF Uganda Country Office (UCO) Contribution to the Comprehensive Refugee Response Framework (CRRF),* p. 5.
[104] OPM (2018) CRRF Secretariat: Strengthening District Coordination. *Issue Paper #1,* p.6.
[105] UNHCR (2021) *Global Compact on Refugees: Indicator Report,* footnote 94.

3.2. Progress towards the pillars of the CRRF

This chapter provides an overview of the progress made towards the five pillars of the CRRF: admission and rights (pillar 1); emergency response and ongoing needs (pillar 2); resilience and self-reliance (pillar 3); expanded solutions (pillar 4); and voluntary repatriation (pillar 5). While this section outlines the main achievements and challenges towards the CRRF pillars since the adoption of the CRRF, it is difficult to establish a clear causal connection between the CRRF and specific outcomes.[106] For example, the CRRF repackages a number of ideas that were already embedded in Ugandan legislation prior to the adoption of the CRRF (such as refugees' right to work and freedom of movement), as well as ideas that were already circulating prior to the adoption of the CRRF (such as the humanitarian-development nexus and the importance of private sector engagement). In addition, the CRRF – and in particular the sector response plans created in the context of the CRRF – were adopted relatively recently and their tangible achievements may not yet be visible, particularly considering the context of COVID-19, which has slowed down the implementation of the CRRF.

Pillar 1: Admission and rights

Pillar 1 focuses on refugees' access to Ugandan territory, their full enjoyment of rights, as well as matters related to registration, documentation, and land issues. Progress towards Pillar 1 has been strongly facilitated by a highly progressive refugee policy framework which was already in place, pre-dating the CRRF, and backed up by political support for these policies at the highest levels of government. This included an open-door policy, the allocation of land to refugees on arrival to construct a permanent shelter and to promote their self-reliance in terms of food production, and their right of freedom of movement and right to work – provisions that are not always available in neighbouring countries. The government has generally maintained its open-door policy towards asylum seekers and new arrivals for most of the period since March 2020, despite COVID-19 and the fact that borders have been closed to other movements.

There has been a strong role for humanitarian partners in support of the government, particularly at points of entry, and in registration, access to documentation and other protection issues. That said, FGD participants indicated several ongoing challenges in the registration and documentation process, including delays in the issuance of new or replacement refugee identity documents (though this also applies to host communities in remote rural areas of Uganda); non-issuance of, or inaccurate, birth certificates for newborns; corruption, preferential treatment, and rudeness towards refugees. The challenge of differentiating between refugees and host communities during verification exercises was also highlighted, particularly in the northern RHDs, with cases of Ugandans registering as refugees to avail humanitarian assistance.

District-level KIs and FGD participants also noted different treatment of different nationalities (Burundi, Rwandese, South Sudanese), with Rwandans reportedly facing particular difficulty in acquiring refugee status and documentation.
FGD participants illustrated the need for more sensitisation about refugee rights, to authorities, host communities and to refugees themselves, with a need for awareness-raising and improved avenues for both refugees and host communities to register complaints and concerns. While these systems are in place, FGD participants highlighted that they see limited follow-up on the issues they raise.

Several other issues remain. For instance, different systems of land ownership make it difficult to create a harmonised policy on land provision. In the northern RHDs land is communally

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[106] Challenges related to analysing the impact of the CRRF are also described in Research & Evidence Facility (2020) *Comprehensive Refugee Responses in the Horn of Africa: Regional Leadership on Education, Livelihoods and Durable Solutions.* London: EU Trust Fund for Africa Research and Evidence Facility, pp. 21-23.

owned which can lead to long and complex negotiations on land allocations to refugees – though this is somewhat balanced by a long history and acceptance of refugee movements across the northern Ugandan border, in both directions. In the south-western RHDs, land is owned and directly allocated to refugees by the government, which can also lead to tensions between the refugees and the host communities who are subsequently denied access.

Nevertheless, the existing land policy is under pressure due to ongoing refugee inflows, the coming-of-age of refugee children, as well as high natural population growth of both the refugee population and the host community. Given the numbers involved, many KIs at both national and district level highlighted that there is insufficient quality land available in and around the existing refugee settlements, resulting in reduced plot sizes that no longer allow for self-reliance in food production. Furthermore, land allocations to refugees are not always formalised or respected by landlords, leading to lack of clarity on ownership, disputes and tensions between refugee populations and host communities, and the need for renegotiation. Registration of refugees and other emergency support such as WFP food rations and cash transfers take place only within the formal settlements, in part so as not to create a pull factor towards secondary urban centres. However, KIs at both national and district levels raised concerns on the presence and dynamics of refugees in urban centres outside the formal settlements, with pendular movements between the two – for example, in centres such as Koboko town where refugees from Bidibidi are able to assimilate due to cultural similarities. This causes increased pressure on the resources, facilities, and infrastructure of secondary urban centres, which are not fully equipped or supported to accommodate them. The above issues are underpinned by a lack of clarity on the finalisation and promulgation of the Settlement Strategy, noted in the section on Planning and policy gaps.

Finally, while Uganda is considered a benchmark country for addressing refugee admissions and rights in other refugee contexts, some government KIs identified a certain threat to asylum space in Uganda should adequate engagement and financial support from international donors in pursuance of the other CRRF pillars not be forthcoming.

Pillar 2: Emergency response and ongoing needs

Pillar 2 focuses on the provision of life-saving emergency food and non-food assistance to refugees, primarily by humanitarian agencies, as well as the integrated delivery of basic services, namely education, health and water-sanitation, in RHDs. Integrated service delivery aims at ensuring equal access to services for both refugee populations and host communities, drawing in development partners, and with the ambition of an eventual transfer of responsibility for and ownership of these services to the government.

WFP and its implementing partners continue to provide food rations and cash transfers to refugees in settlements, but reduced humanitarian budgets have led to reduced rations; in 2021, food rations dropped to 40-60% of the recommended minimum standard depending on the level of vulnerability of the settlement.[107] Emergency food and non-food assistance is not provided to host communities, though, according to KIs, this does so far not seem to have led to significant tensions with refugee populations. At present, there is no corresponding government-owned shock-responsive safety net for vulnerable Ugandans living adjacent to refugee settlements – or elsewhere in Uganda for that matter.[108] As the future targeting of food and cash rations is to be based on vulnerability, some KIs suggested that vulnerable host community members could, or should, also be included.

KIs at national and field level, as well as the FGD participants, indicated having perceived an overall improvement in the access of both refugees and host communities to basic services in

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[107] See The Economist (2021) Rationed out: Refugees in east Africa go hungry as funds dry up. *Middle East & Africa*, 7 August.
[108] It should be noted that a Cabinet Paper has reviewed this in early 2022 and committed to the development of a Uganda Social Action Fund Program.

the RHDs, particularly in relation to education and health, since the launch of the CRRF in 2017. According to KIs, the CRRF has encouraged the construction of more sustainable education and health facilities (as opposed to temporary structures) and improvements have been made to water infrastructure, as well as to roads, electricity and telecommunications networks – much of which has been made possible through increased financing from development partners.

However, while facilities have been built, findings suggest that they cannot always meet the increased demand of the growing refugee and host community populations, manifested in overcrowding, and further undermined by a lack of qualified staff. Access to services is also hindered by limited supplies (education materials, medicine, water storage containers) or other resources, meaning that basic standards and quality of service delivery are not always met. Several humanitarian KIs pointed out that emergency (SPHERE) indicators for these basic services are no longer being met even in the refugee settlements, and lag behind standards in neighbouring refugee contexts. For example, comparing refugees who arrived before the age of 16 in Uganda and in Kenya, Alexander Betts (2021) found that refugees in Uganda receive on average two years less education than those who arrived in Kenya.[109]

As a result, KIs expressed their concern that momentum and attention to addressing the broader objectives of the CRRF, particularly Pillar 3, has led to reduced humanitarian budgets, and consequently under-achievement of basic emergency indicators under Pillar 2. This illustrates the continued need for the OPM-UNHCR led RRP and the continued involvement of humanitarian or emergency actors in the refugee response, as highlighted in the NAP 2021-2022[110]. Betts came to a similar conclusion in his comparison of education for refugees in Uganda and Kenya, writing that "Uganda's integrated service provision model may need greater international support, particularly in relation to overcoming practical barriers to access."[111]

While basic humanitarian standards are not always met in the refugee settlements, KIs indicated that access to services tends to be better (or is perceived to be better) in these settlements compared to host community areas, which is indicative of the highly limited access to basic services among rural populations across Uganda, not only in RHDs. As the CRRF approach aims to ensure equitable access to services for both refugees and host communities, this is in part promoted by a target ratio, which prescribes that at least 30% of activities in projects implemented in the refugee response need to target host communities. Participants in some of the host community FGD groups questioned this, claiming that they do not see this ratio of assistance in practice, and requesting that they be better involved in the resource allocation and planning processes. Several district-level KIs advocated for a more even balance (50%-50%). Ultimately, equitable access should be informed by a needs-based approach, rather than by a fixed ratio.

Although services can be used by both refugees and host communities, facilities seem to be concentrated in or adjacent to refugee settlements, and host communities at distance from the settlements face logistical obstacles and increased costs to accessing them. Moreover, water systems installed in refugee settlements are not always extended to, or connected to existing systems in the adjacent host communities. Furthermore, some district-level KIs noted that while services are provided by international organisations on a timely basis and mostly free of charge in the refugee settlements, the same level of service provision is not always available to the host community, which was echoed by FGD participants.

FGD participants from both the host and refugee community have also highlighted cases of differential treatment between the two groups at the same facilities. For example, on the one

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[109] Betts (2021) *The Wealth of Refugees*. Oxford, UK: Oxford University Press, pp. 134-135.
[110] OPM (2021) *CRRF National Plan of Action 2021-2022*, p. 23.
[111] Betts (2021) *The Wealth of Refugees*. Oxford, UK: Oxford University Press, p. 135.

hand, host community FGD participants have indicated that refugees are prioritised at health facilities in the settlements, and are provided with free services (e.g., meals in hospital wards) that are provided at a fee to host community patients. In addition, they voiced their dissatisfaction with the subsidisation of education and water fees available for refugees and not for the host community. On the other hand, refugee FGD participants indicated that they feel deprioritised at host community health facilities (e.g., referral hospitals) and that they need to pay higher fees at higher education facilities (e.g., universities) than Ugandan nationals.

The CRRF foresees the eventual transfer of ownership of the new health and education facilities and services, and water-sanitation systems, from the international aid community to the government, with access ensured for both refugees and host communities. While internationally-supported facilities and services still exist in parallel to government systems (especially in education, and water), some facilities have already been integrated into the government system, with others being prepared for handover through 'coding'. For example, UNHCR-implemented water systems in several refugee settlements have been transferred to the National Water and Sewerage Corporation and the so-called 'umbrella authorities', affiliated to the MoWE. 72% of all health facilities have been coded for transition to Government ownership, with 15 facilities already handed over[112].

Multiple KIs from different stakeholder groups highlighted that the key challenge to achieving this transition, is ensuring continued financing for quality service delivery, considering government budgets are likely to be unable to meet the cost in the long term. In line with international responsibility sharing, and as the responsibility for the well-being of refugees is carried internationally, and not by the government of Uganda alone, the government cannot and should not be expected to have to cover all costs related to the service delivery to refugees.

Several KIs warned that the integration of service delivery into government systems should not be viewed by the international community as an 'exit strategy'. Indeed, it is vital that development partners continue to commit predictable and long-term financing to ensure sustainable quality service delivery, including technical capacity and maintenance of facilities, under the CRRF/GCR notion of international responsibility and burden-sharing. This also implies that donors will have to finance more "on-budget", to support government ownership – possibly through IFIs - rather than through UN agencies or international NGOs. This topic would benefit from a comprehensive discussion at the level of the CRRF Steering Group.

Several KIs expressed the need for a strategic framework (e.g. a 'Transition Strategy' – see the section on Planning and policy gaps) for the transition of service delivery into government systems, incorporating a phased approach, accommodating the continued engagement of development partners and involvement of humanitarian and development actors, and foreseeing the eventual establishment of social protection mechanisms to further guarantee access.

Pillar 3: Resilience and self-reliance

Pillar 3 of the CRRF in Uganda aims at enhancing the resilience and self-reliance of refugees and of host communities in RHDs, and, similar to Pillar 2, foresees the inclusion of refugees in government planning. Full integration of refugees, involving the provision of citizenship, is one of the three traditional durable solutions for protracted refugee crises, but is not foreseen under the CRRF in Uganda. However, other local initiatives that foster the peaceful and productive inclusion of refugees and the well-being of local communities, are introduced in the GCR as a viable interim solution, preparing refugees for, and thus complementary to, the eventual fulfilment of the other two durable solutions, namely third country resettlement and voluntary return to countries of origin (Pillars 4 and 5 respectively).

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[112] OPM (2022) *CRRF Annual Report 2021.*

Pillar 3 is underpinned by a favourable policy environment, including the allocation of land for food production, as well as freedom of movement and the right to work and to own businesses – all of which nurture the potential for accessing jobs and livelihoods, thereby enhancing the resilience and self-reliance of refugees. Progress towards Pillar 3 has also been facilitated by the inclusion of refugees into the NDPs, as well as by development funding and programmes, being the pillar that has drawn most of the attention of the development actors, together with the integrated service delivery component of Pillar 2.

Several development partners have financed livelihoods programmes, aimed at enhancing the resilience of both refugees and host communities; according to KIs and FGD participants, this has also contributed to improved social cohesion and self-reliance. KIs highlighted the World Bank-funded *Development Response to Displacement Impacts Projects* (DRDIP), which actually preceded the adoption of the CRRF in Uganda, but was subsequently adapted under IDA-18, to include refugees as direct beneficiaries, and the Government of Denmark funded *Northern Uganda Resilience Initiative* (NURI). Also noted were the EU-funded *Development Initiative for Northern Uganda* (DINU) and the *Response to Increased Demand on Government Services and creation of economic opportunities in Uganda* (RISE), implemented through GIZ, as well as the EU Trust Fund for Africa, whose programmes in Uganda were specifically aligned to the CRRF approach, addressing the needs of both refugees and the host community. Development partners have also worked together with training institutions in RHDs to provide skills and vocational training, as well as with the private sector, to identify opportunities for refugee inclusion in the workplace.

District-level KIs and participants in refugee and host community FGDs noted that refugees also access work on host community lands; meanwhile, host communities may receive income from renting land – all of which reportedly further contributes to social cohesion when managed appropriately. In addition, according to district-level KIs, the establishment of humanitarian and development programmes in the RHDs has led to opportunities for paid employment (professional and manual) on these programmes, for both refugees and Ugandans. However, more effort could be done on data collection and understanding cross border trade and ways that refugees could be involved in small value cross border trade, which could create economic opportunities for refugees in areas where they have a comparative advantage.

Some host community FGD participants reported having benefitted from the inflow of refugees, mentioning that there has been an improvement in their livelihoods since 2017, with better access to markets, commodities and work opportunities. Other host community FGD participants, however, had expected greater benefits from the presence of refugees (notably in return for having provided host community lands for the settlements) and consider that there have not been sufficient livelihoods opportunities for the host community, vis-à-vis those of the refugees.

Other challenges remain. Self-reliance of refugees depends first and foremost on continued allocation of land for food production, but this is currently threatened by the declining and consequently inadequate size and productivity of land plots, exacerbated by incidents of non-respect of land tenure and use, as reported by several KIs and FGD participants, and echoed by the evaluation of the STA.[113] While the provision of plots of land to refugees seems to result in better dietary diversity, food security and caloric intake, the progressive reduction of the quantity and quality of plots available to refugees has challenged the potential of the policy to ensure self-reliance.[114] This is made all the more critical by the ongoing cuts in WFP food rations.

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[113] Office of the Prime Minister (2022) *Settlement Transformative Agenda II 2022-2025: Draft STA*. January 2022.
[114] Betts (2021) Uganda: The right to work and freedom of movement. *The Wealth of Refugees.* Oxford, UK: Oxford University Press, pp. 133-134; also see Idris (2020) Integrated approaches to refugee management in Uganda. *K4D Helpdesk Report*.

In terms of non-agricultural livelihoods, KIs reported that refugees often lack skills, and refugee FGD participants highlighted that the qualifications they do have are not always recognised in Uganda. As a result, they often end up working in the unregulated and economically insecure informal sector. Livelihoods projects implemented by development partners may lack sustainability after they end, and those refugees and Ugandans who do gain formal employment at humanitarian and/or development organisations are often on temporary contracts due to the time-bound nature of their presence and projects.

A key concern is the limited opportunities for youth, especially those who have missed out on several critical years of education in their country of origin and as refugees, as well as due to the closure of schools under COVID-19. Those refugees that do have the requisite skills and competencies often find it difficult to access start-up capital or credit; furthermore, they are not entitled to access civil service jobs. Remoteness and lack of investment by the private sector, vital for the long-term development of districts, are also barriers to decent jobs and livelihoods opportunities.

Several KIs and FGD participants noted a lack of awareness and transparency around the inclusion of beneficiaries for livelihoods programmes. Host communities argue that they are not sufficiently targeted, while some refugee KIs perceive the host community to be prioritised over them. Some interlocutors also raised issues of inadequate targeting of persons living with disability, youth, women, and men.

While development actors and several governmental KIs referred to their interventions, and considered resilient and sustainable livelihoods their natural domain, many humanitarian actors and other government KIs considered that development actors have thus far achieved only limited impact under Pillar 3, and consequently emphasise the need for themselves to stay engaged in livelihoods support. This does not only apply to refugees; many among the host community are also not considered to be self-reliant. As for Pillar 2, some KIs raised the need for a discussion on potential development and expansion of safety nets and social protection systems, an expected outcome of the Strategic Direction, to provide some support to those refugees and Ugandans who are unable to meet their own livelihoods requirements. Such systems exist to varying degrees in other countries in the region.

Full socio-economic integration is still a long-term aim. Inclusion and self-reliance through equal access to jobs and livelihoods, as well as essential services, are foreseen in highly progressive national and CRRF-specific policies, but genuine socio-economic integration will come only with citizenship for refugees, which does not yet seem to be on the government's agenda.

Pillar 4: Expanded solutions

Pillar 4 ('expanded solutions') refers to third country resettlement, one of the traditional durable solutions to protracted crises. To date, very little attention has been given to this pillar by the CRRF Steering Group, and very few of the KIs considered it worthwhile discussing this pillar in the context of their own engagement with the CRRF in Uganda. At best, third country resettlement only applies to the most at-risk refugees, not people from the host community, and the numbers involved are considered by KIs to be too insignificant to represent a genuine durable solution for the vast majority of the refugee population. Nor are they attributable to the application of the CRRF in Uganda, but as some KIs pointed out, to political decisions made in other countries. Refugee FGD participants reported insufficient awareness about the possibilities for resettlement and a lack of clarity on the steps to be taken.

According to the CRRF Annual Reports 2020 and 2021, third country resettlement figures are as follows: 2018: 3,999; 2019: 3,288; 2020: 436; 2021: 1,451. An additional 192 individuals have been resettled under the GCR's complementary pathways initiative. The bulk of the resettlements were in Norway, Canada, Australia, Sweden, France and the Netherlands.

Third country resettlement is handled primarily by DoR and UNHCR, with limited involvement of other CRRF stakeholders, raising the question of what the role of the CRRF in Pillar 4 should be. There has been insufficient lobbying at either regional or global level; this could be a role for the CRRF Secretariat together with the Ministry of Foreign Affairs, through the better application of the communication and outreach strategy, targeting the traditional countries of resettlement, as well as non-traditional countries within the region.

Pillar 5: Voluntary repatriation

Pillar 5 ('voluntary repatriation') refers to refugees' safe, voluntary, informed and sustainable return to their place or country of origin, usually assisted by UNHCR. It is one of the traditional durable solutions to protracted crisis, and does not include spontaneous or pendular returns which KIs indicated are occurring at a large scale in the context of refugees in Uganda.[115] As with Pillar 4 (expanded solutions), there has been little discussion of this pillar in the CRRF Steering Group, and little attention from KIs apart from some who noted that voluntary repatriation depends on successful conflict-resolution in the countries of origin. Most KIs did not consider that their strategies or programmes made any significant positive contribution to voluntary repatriation – although some pointed out that education, skills-building and vocational training may facilitate re-integration once back in the country of origin.

Nevertheless, several KIs and FGD participants pointed out that spontaneous returns may actually be inadvertently pushed by declining conditions, unmet needs and lack of socio-economic prospects for refugees in Uganda. In fact, according to some refugee FGD participants, such movements back to countries of origin, due to unmet needs, are already happening.
Government engagement with IGAD's Regional Support Platform is aimed at addressing root causes of displacement from neighbouring countries, but there has been little progress on this. Given that conditions conducive to refugees' safe and sustainable return do not currently exist in most of the countries of origin, voluntary repatriation is not a viable durable solution in the near future, except for isolated cases. According to the UNHCR, 232 individuals were voluntarily repatriated in 2020, and 3,856 in 2021 – the vast majority to Burundi[116]. Similar to Pillar 4, voluntary repatriation is handled primarily by DoR and UNHCR, with limited involvement of other CRRF stakeholders, raising the question of what the role of the CRRF in Pillar 5 should be.

3.3. Cross-cutting issues

Social cohesion

Many KIs, particularly at district level, spoke about positive relations between host communities and refugees, with relations having improved over time; several international KIs with experience of refugee crises in other parts of the world considered that the degree of social cohesion is stronger than might have been expected, especially considering the speed and scale of the post-2016 inflows. The long history of refugee (and other) movements across Uganda's borders, in both directions, plus close ethnic, cultural and linguistic ties have undoubtedly contributed to this, but the active engagement of both host communities and refugee populations in the response has also promoted social cohesion. In this, district-level KIs pointed to the increased attention of central government, and to the role of internationally-supported initiatives and programmes that include and address the needs of both refugees and host communities, improving their access to essential services and their mutual

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[115] UNHCR counted about 74,000 spontaneous returns to South Sudan from Uganda in 2020, according to the GCR Indicator Report (UNHCR (2019) *Global Compact on Refugees: Indicator Framework,* p. 64).
[116] E-mail correspondence, 12.03.21

involvement in livelihoods projects, which have also both contributed to enhanced self-reliance.

While some host community KIs considered that they had not been sufficiently included under CRRF interventions, many reported having seen an improvement in the level of services and infrastructure since the arrival of refugees. This was referred to by several national-level KIs as a "refugee dividend", and was reportedly a factor in motivating some non-hosting districts to offer to host refugees. A recent (2022) study confirms this 'refugee dividend', arguing that "host communities with greater levels of refugee presence experienced substantial improvements in local development."[117]

Nevertheless, some KIs reported tensions between host communities and refugees (as well as within refugee communities) over access to land and inequality of access to services; tensions over supposed pressure on forest cover, agricultural and grazing land, and water resources were also noted – though several KIs emphasised that these pressures exist across Uganda, with or without the presence of refugee populations.

Social cohesion between refugee and host community populations, and within refugee populations, is addressed via district-level peace committees, which ensure regular liaison between refugee leaders, and local council leaders; these are established in most RHDs. These peace committees were first established under a broader IGAD initiative on pastoral resource conflict resolution in Karamoja. There is also a Peaceful Coexistence Task Force within the National Refugee Protection Working Group. While KIs and FGD participants noted a general improvement of social cohesion, and the CRRF approach, with its focus on shared services and resources, seems to have clearly promoted/improved social cohesion, it should not be taken for granted, especially in a context of diminishing available land and resources for the two communities.

Environmental impact

KIs at both national and district level, as well as FGD participants, raised concerns that increasing populations in RHDs have led to high levels of environmental degradation in terms of deforestation (largely for shelter construction and charcoal) as well as over-exploitation of grazing land and water resources – and that this is a factor in tensions between host communities and refugees. It should be noted, however, that although environmental degradation can be observed in RHDs, recent studies, conducted between 2019 and 2022[118] stress that this is not merely the result of the inflow of refugees. In fact, environmental degradation started to accelerate prior to the surge in refugee arrivals in 2018, and that refugee arrivals should be considered in combination with ongoing pressures on the environment by host communities and business activities in these districts. In fact, the World Bank and FAO suggest that there is "no consistent link between the refugee settlements and patterns of tree cover loss."[119]

Whether correlated with refugee arrivals or not, these studies observe an accelerated degradation of the environment, which was echoed by the experiences of KIs and FGD participants. KIs emphasised that the restoration of degraded environments will require long-term interventions and funding. Approximately 66% of the Water and Environment SRP budget is focused on Environment and Natural Resources (Outcome 2)[120] and while many KIs,

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[117] Zhou, Grossman & Ge (2022) Inclusive refugee-hosting in Uganda improves local development and prevents public backlash, p. 1.

[118] World Bank and FAO (2020) Assessment of Forest Resource Degradation and Intervention Options in Refugee-Hosting Areas of Western and Southwestern Uganda. Washington DC: World Bank Group; The Independent (2022) Refugees and environmental degradation. *NEWS ANALYSIS*, 7 February 2022; and World Bank and FAO (2019) Rapid Assessment of Natural Resource Degradation in Refugee Impacted Areas in Northern Uganda: Technical Report. Available here.

[119] World Bank and FAO (2020) Assessment of Forest Resource Degradation and Intervention Options in Refugee-Hosting Areas of Western and Southwestern Uganda. Washington DC: World Bank Group, p. vii.

[120] Water and Environment SRP

particularly at district level, noted the existence of projects to benefit environmental protection, they indicated that more needs to be done. Environmental issues are also well-integrated in the Sustainable Energy SRP, and to a much lesser extent in the Education, and Jobs and Livelihoods SRPs; given the inter-relationship between the environment and most sectors of intervention, KIs suggested that environment should be better integrated across all SRPs, with all programmes subject to a rigorous environmental impact assessment, as suggested by the Water & Environment SRP.[121]

Gender and protection

Several KIIs indicated that there is insufficient capacity and expertise on, and attention to, gender and protection considerations under the CRRF in Uganda – although gender and protection are fully integrated into the OPM-UNHCR RRP, and are also addressed in NDP 3. KIs identified a lack of gender sensitivity and protection awareness at the CRRF Secretariat, as well as among line ministries in charge of implementing SRPs. While protection is fully integrated into the NAP 2021-22, there is much less attention to gender. There are Protection and Gender Working Groups tied to the RRP, and a Gender Working Group under the DPG. Protection is specifically addressed under Pillar 1 of the CRRF in Uganda, but both protection and gender concerns run through all 5 pillars. There is, however, no dedicated SRP for either gender or protection, and there appeared to be no obvious appetite among the different KIs to create them. Instead, KIs recommended better mainstreaming and integration of gender and protection within the existing SRPs and their M&E frameworks; several KIs considered that there had been insufficient consultation on protection during the elaboration of the different SRPs and identified mid-term reviews as an ideal opportunity to address this. Protection (notably child protection) and gender are fully integrated into the ERP, but to a much lesser extent in the other four SRPs.

Some KIs noted an improvement in representation and leadership of women among refugee groups and in the host community. As examples, there is equal representation of women in the REF, and the REF ensures the inclusion of 1 woman in the group of 2 who represent the wider REF at the Steering Group meetings. Women also now account for up to approximately half of the settlement-level RWC elected representatives at settlement level, and refugee and host community women reportedly lead and manage their own Savings and Loans Groups. While there are ways for refugee women to be represented through the REF, consideration should be given on to ensure that host community women could be represented in the proposed District Engagement Forum. Some FGD participants raised increased protection challenges, including an increase in crime, gender-based violence and substance abuse, since the arrival of refugees.

COVID-19

COVID-19 has severely affected the roll-out of the CRRF. In-person coordination meetings were no longer possible, and while some meetings could be moved online, engagement between partners and other stakeholders, as well as with refugees and host communities, decreased. Field visits, including for assessment and monitoring activities at district level, were also curtailed, in particular during the nation-wide lockdowns in 2020 and 2021.

In addition, government, development partners and the wider international community reallocated funds, staff and other resources and attention to the COVID-19 response, leaving less funds available for the implementation of the CRRF. This necessitated an adaptation of programmes, with a resultant loss of momentum: some international advisors and contractors left, staff had to work remotely, and many projects stopped or were delayed, particularly those that involved a high level of refugee or host community participation. KIs expressed concerns regarding the negative effects of COVID-19 on the mental health of refugee populations, host

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[121] WESRP

communities and humanitarian staff.[122] All that said, despite the challenges related to the roll-out of the CRRF and a certain loss of momentum, there has been an impressive level of continued commitment to the implementation of the CRRF in Uganda, as evidenced by the ongoing CRRF-related activities at national and district level in 2020 and 2021.

Many KIs were highly concerned about the closure of national schools between March 2020 and January 2022, which reportedly had major negative effects on children's education. Their reopening, and the critical challenges of implementing catch-up programmes as well as addressing the associated child protection needs (such as a reported increase in child labour, and child marriage as a result of the prolonged school closures), will require significant time and resources and might further move attention and resources away from the CRRF. Health sector activities reportedly faced significant human and financial resource gaps due to the re-focusing of the sector on the response to COVID-19 (which according to one KI also led to the deprioritisation of other healthcare issues, such as HIV and malaria). KIs also shared concerns about the effects of COVID-19 on refugee livelihoods, in particular for urban refugees whose needs and vulnerability increased, further limiting their level of self-reliance. Poverty among refugees is estimated to have increased from 44% before the outbreak to 52% in October-November 2020. During this time, 89 per cent of households experienced declines in total income, while the number of households that reported running out of food due to lack of money or other resources increased from 61% in 2018 to 85% in late 2020[123].

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[122] For example, 54% of refugees reported depression in 2021, see Atamanov, Beltramo, Reese, Rios, Abril & Waita (2021) *One Year in the Pandemic : Results from the High-Frequency Phone Surveys for Refugees in Uganda.* World Bank, Washington, DC. See: https://openknowledge.worldbank.org/handle/10986/36127
[123] UNHCR (2019) *Global Compact on Refugees: Indicator Framework,* pp. 47-48

3.4. Comparison with other CRRF countries

Most of the KIs who were able to make a comparison between the implementation of the CRRF in Uganda with that in other countries were international staff. They generally viewed Uganda as a leading example, with strong initial buy-in from a broad range of stakeholders including national and district-level government and development partners, and with good practices that could inspire and eventually be replicated in other refugee contexts.

Uganda's long-standing, progressive, and enabling legal and policy environment provides for the allocation of land to refugees, freedom of movement and right to work and own businesses – provisions that are not available to the same degree in neighbouring countries.[124] For example, comparing the results of refugee legislation on outcomes for refugees and host communities in Kenya and Uganda, one study found that "a regulatory framework that provides basic socio-economic freedoms, such as the right to work and freedom of movement, leads to a series of better socio-economic outcomes than would be the case in the absence of those entitlements."[125] In particular, the study found that compared to Kenya, Uganda's regulatory framework promoted greater mobility, lower transaction costs for economic activities, greater purchasing power, and more sustainable employment for refugees. However, the same study also encouraged a nuanced view of the impact of these regulations, given the challenges related to the sustainability of Uganda's land allocation model, to the level of service provision – in particular education, and to the low levels of assistance to urban refugees in Uganda.[126]

The government-led CRRF Steering Group, backed up by a CRRF Secretariat that was considered by KIs to be relatively effective, is widely acknowledged as a model high-level and inclusive forum, bringing multiple stakeholders together, from senior-level government personnel to elected refugee representatives. The establishment of the REF and its participation in the Steering Group is considered a particularly innovative and highly-progressive initiative. It is reportedly "the first national-level refugee engagement and representation mechanism"[127] in the world, with the "potential to inspire other countries to adopt a similar approach".[128]

KIs also noted the inclusion of refugees in the NDPs, plus the existence of costed Sector Response Plans, and the efforts made to align them to broader policy. Some KIs suggested that these had positively influenced the inclusion of refugees in the NDPs of other countries, as well as the replication of the SRP model.

The focus of OPM on the coordination and management of the refugee response, rather than the direct implementation of activities, was also held up as a positive practice. This contrasts with some countries where the strong involvement of the state's corresponding refugee agency in implementing services and infrastructure provides institutional barriers towards closer collaboration with line ministries and other stakeholders in areas where they have a strong comparative advantage. Furthermore, KIs noted better engagement between central and district level actors (with the full participation of the MoLG) and between humanitarian and development actors than in other countries.

The above points have allowed a leadership role for senior-level Ugandan officials at international conferences and events on refugees (including the GCR, the Global Refugee Forum and the High-Level Official Meeting), which also serve to showcase Uganda's achievements in implementing the CRRF, and to advocate for continued international support.

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[124] Research & Evidence Facility (2020 *Comprehensive Refugee Responses in the Horn of Africa: Regional Leadership on Education, Livelihoods and Durable solutions.* London: EU Trust Fund for Africa Research and Evidence Facility.

[125] Betts (2021) Uganda: The right to work and freedom of movement. *The Wealth of Refugees*. Oxford: OUP, p. 120.

[126] Betts (2021) Uganda: The right to work and freedom of movement. *The Wealth of Refugees*. Oxford: OUP, p. 141.

[127] U-Learn & the REF Task Force (2021) Refugee Engagement Forum in Uganda: Good Practice Study, p.4.

[128] U-Learn & the REF Task Force (2021) Refugee Engagement Forum in Uganda: Good Practice Study, p.1.

Some KIs referenced good practices in other countries that could be adapted to the context of Uganda. These included the continued prioritisation given towards meeting the protection and other emergency needs of refugees; several humanitarian KIs pointed out that some emergency standards (e.g., the SPHERE standards) are no longer being met in the refugee settlements, and lag behind standards in neighbouring refugee contexts. Shock-responsive safety nets and social protection systems for refugees also exist to varying degrees in other countries in the region, and their development and adaptation to include refugees was noted as a practice that Uganda might emulate.

In addition, it was suggested that Uganda might replicate the CRRF tagging system applied to programme proposals and reports under Somalia's National Durable Solutions Strategy, which reportedly could allow for better tracking of development partners' funding. Finally, KIs acknowledged that the potential replication of good practices between countries needs to be carefully considered and adapted to the local context; there is no one-size-fits-all solution.

IV. CONCLUSION

It is now five years since the adoption of the CRRF in Uganda. Its adoption coincided with one of the largest refugee inflows in Uganda's history, which required a major scale-up of the existing approach to the management of the country's refugee crisis. While the refugee response was long the domain of specifically-mandated government agencies (e.g. DoR), and the international humanitarian community, the CRRF sought to nurture a stronger sense of ownership across multiple sections of government, to more systematically engage development partners and other non-traditional actors, and to address the needs of host communities as well as the refugees themselves.

Five years represents an appropriate moment to take stock and identify best practices, to consider progress and remaining challenges, and to suggest adaptations to the institutional structures and implementation strategies over the coming years, pending a full impact evaluation currently foreseen for 2024.

The New York Declaration and Global Compact on Refugees provided a bold vision under the CRRF. Uganda has made strong iterative progress on realising this vision and there are steps to be taken to continue this progress. Overall, the evaluation concludes that there has been remarkable progress in the implementation of the CRRF in Uganda, in particular when compared to other countries. Policies and plans have been developed and promulgated, institutions established, and a wide range of stakeholders have been engaged. Despite the impact of the COVID-19 pandemic, the roll-out of the CRRF in Uganda has continued, albeit at a slower pace. As the CRRF moves towards a new phase, from the development of policies, plans and institutions into full implementation, there is a need to revisit, refine, and re-calibrate the existing systems and practices, addressing the following issues. Specific recommendations to address the issues raised are to be found in the subsequent V. RECOMMENDATIONS.

Roles, responsibilities, and representation

The CRRF has been successful in engaging and bringing together a wide range of stakeholders, beyond the DoR and UNHCR, which can be considered a major outcome of CRRF implementation in Uganda. The adoption of the CRRF has led to the establishment of innovative, representative, and nominally inclusive support and coordination structures, notably the CRRF Steering Group, the CRRF Secretariat, the REF and the proposed District Engagement Forum, which has galvanised the participation of MDAs, development partners, and affected communities. However, there appears to remain a lack of clarity on the mandates, roles and responsibilities of each stakeholder group, and their degree of genuine representation.

While the CRRF Secretariat has played a critical role in the coordination, awareness and roll-out of the CRRF in Uganda, findings indicate that there is an ongoing lack of clarity regarding the Secretariat's legal status, and a lack of consensus as to its role vis-à-vis the OPM DoR, at both national and district level. This has caused considerable tensions and friction between the DoR and the Secretariat, as well as with the MoLG and the DLGs, and other MDAs – though these tensions now seem to be diminishing. According to KIs, the former disconnect between the national and district level has been largely alleviated by the MoLG's co-chairing of the Steering Group.

The CRRF has attracted the increased attention and engagement of development partners and the rest of the international aid community, leading to a likely increase of development funding for the refugee response. However, there remains a mismatch between the ambition of the CRRF – including the initial expectations of the government – and the actual financing

provided by the international community for its implementation, especially that which is channeled through government. This has left the SRPs (as well as the RRP) under-resourced. Together with a lack of reporting by development partners, this has been perceived by some government members as disengagement and non-fulfilment of the commitment to 'burden-sharing' by the international community; there are concerns that, if left unaddressed, this might negatively impact the government's progressive refugee policies.

Even though most policy and coordination processes are highly consultative, and despite the participation of the REF and the future District Engagement Forum, there remains concern at both national and district level, that refugee and host community voices are not sufficiently considered in decision-making. Furthermore, certain vulnerable groups within these communities do not seem sufficiently represented, including youth and persons with disability.

Similarly, while national and local NGOs are formally represented through the National NGO Forum, there are concerns that they are not sufficiently empowered, and there is a need for a localisation strategy to enhance their ownership and involvement in the response. This is also the case for refugee-led organisations, which are particularly active in Kampala, yet which are reportedly often excluded from the formal humanitarian system.[129] Additionally, with UNHCR in the lead for the refugee response, some other agencies (UN and international NGOs) are dissatisfied with their lack of representation or 'space' in the response. Certain other stakeholder groups are not sufficiently engaged at coordination platforms, including the private sector and academia.

Alignment of plans and processes

The CRRF is implemented in a context of multiple existing and emerging policies and institutions. Uganda's long-standing, progressive and enabling legal and policy environment has provided a strong foundation to support the implementation of the CRRF. This has been further facilitated by the inclusion of refugees into the NDPs. The development of CRRF-specific plans such as the NAPs and SRPs has been widely appreciated, but there is a lack of clarity and coherent vision as to how to better align these with the broader policy environment, notably the new NDP, with its programmatic approach, the DDPs and the humanitarian-focused RRP, as well as the 'broader vision' and results framework of the CRRF embedded in the Strategic Direction and NAP. Moreover, findings suggest that there is also a lack of synergy between the different CRRF documents, notably the SRPs, which appeared to remain closely aligned to line ministries but insufficiently with each other, somewhat mitigating against effective joint programming. This should be addressed by the Steering Group, in line with its ToR. In addition, the proliferation of any additional further refugee planning documents must ensure full alignment with existing plans and CRRF strategies to avoid further refugee planning fragmentation.

Associated to the multiple policy processes is a plethora of coordination mechanisms (RRP WGs, SRP-related meetings, DPG sub-groups, national-level WGs on the NDP 3, Steering Group meetings, etc.), which appears to limit the efficient use of time and human resources. Furthermore, despite the multiple coordination mechanisms through which actors canto meet and resolve their differences, there remain tensions between the development partners and the key government agencies in the CRRF, for example related to funding levels, ownership, and the sharing of information.

There are multiple reporting structures, operated by OPM (URRMS), UNHCR (ActivityInfo), the MoFPED (AMP), and those part of each SRP, which are not systematically used – many donors appeared reluctant to report through government-led mechanisms, and no-one was able to provide a complete overview of funding and implementation of activities. This results

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[129] Pincock, Betts & Easton-Calabria (2020) *The Global Governed? Refugees as Providers of Protection and Assistance.* Cambridge: Cambridge University Press.

in an increased risk of duplication, as well as unidentified and unfilled gaps and priorities. This should be addressed by the Steering Group, in line with its ToR.

Geographic and thematic coverage

While the CRRF has taken a holistic approach to the refugee response, incorporating the needs of host communities across the different RHDs, there are certain areas whose coverage needs clarification. These include refugee-hosting areas outside these districts, notably transit districts and secondary cities. Additionally, while there is a government definition of host communities, which includes the whole population of the RHD, there is a lack of awareness of this definition, which has led to a differential approach to planning and programming. Nevertheless, a degree of flexibility is needed due to the specificities across and within the different sectors.[130] Furthermore, there are no clear definitions of the host community within the Strategic Direction, the NAP, nor in the individual SRPs.

With the development of five SRPs, the focus has shifted to the effective roll-out and implementation, which will require improving the integration of cross-cutting thematic issues such as protection, gender, and the environment into the existing five SRPs. The development of other strategies and guidelines has lost momentum, which mitigates against the optimal implementation of the CRRF. Such strategies and guidelines would include the Settlement Strategy, the Private Sector Engagement Strategy, a Localisation Strategy, and Guidelines for the transition of service facilities to government ownership.

While efforts are made to align the SRPs with the RRP, there appears to be a lack of consensus on the extent to which humanitarian needs should be incorporated into the SRPs. However, given concerns that basic emergency standards and quality of service delivery are not always being met, most KIs agreed that the RRP remains relevant, and will continue to be so. There is also lack of consensus of the respective roles of humanitarian and development actors, in particular related to the role of UNHCR and other humanitarian actors in the provision in livelihoods support under pillar 3.

Results and attribution

The impact of the CRRF on progress towards the five CRRF pillars is difficult to determine: the plans and structures are relatively new, and the situation on the ground is influenced by a myriad of factors, many of them unrelated to the CRRF.

There is no harmonised M&E system to track progress of the CRRF, and the monitoring of activities is conducted through parallel systems with limited interoperability. There are indicators in the Strategic Direction and the NAP 2021-2022, but there is a lack of follow-up in measuring these indicators, and a lack of awareness of these frameworks outside of the Secretariat. This should be addressed by the Steering Group, in line with its ToR.

Some 'results' are not necessarily attributable to the CRRF as they pre-date its adoption, but have been essential in providing the groundwork for its further implementation. These notably include the progressive policy environment, including refugees' freedom of movement, right to work, and provision of land, and access to infrastructure and services for both refugees and host communities.

Several key results, however, *are* likely attributable to the CRRF, particularly under pillars 2 and 3. These include:
- A so-called 'refugee dividend' for RHDs, due to increased funding from international donors and attention from the central government, plus the potential economic benefits which the refugees themselves bring.

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[130] For example, decision-making on water catchment management is done at the regional level, while water distribution is decided on at district and sub-county level.

- Essential services have become more widely available, with improved facilities and infrastructure constructed or made more sustainable, notably in health, education and water-sanitation. That said, there are concerning reports that emergency indicators are not always being met in and outside of refugee settlements.
- Both refugees and host communities have been included in humanitarian and development programmes, though there are concerns on the appropriateness of and compliance with the recommended 70:30 ratio.
- There seems to have been an overall improvement in social cohesion between refugees and host communities as a result of them accessing the same services and resources, and their mutual involvement in livelihoods projects.
- Transition of services to government ownership is happening in some sectors (health, education and drinking water), in some areas. The challenge going forward will be to ensure the sustainability of this transition.

Impact is particularly difficult to determine for pillars 4 and 5, which operate largely outside the influence of the CRRF architecture.

Sustainability

There has been considerable progress in the operationalisation of the CRRF in Uganda, both in its processes and results. While these gains are being consolidated, there are certain aspects would merit consideration to ensure the sustainability of the CRRF approach in Uganda:

- The CRRF architecture remains over-reliant on international funding: this includes funding channelled by UNHCR to OPM and other international funding directly channelled to the CRRF Secretariat, as well as an over-reliance on international experts and secondees. That said, with many CRRF structures and plans now in place, the Secretariat is expected to become less resource-intensive.
- There are questions as to the long-term relevance of the SRPs, in view of the ultimate objective of integrating refugees into broader government planning processes, notably the national sector plans and the programme-based approach of the NDP 3. There may be a need for spelling out a transition towards the integration of these plans into existing nation-wide policies.
- There is a distinct and widespread lack of clarity as to how the transition of responsibility for the provision of essential services from the international aid community to government ownership is to be effected. There is concern over the limited availability of long-term, sustainable international funding to underpin the continued provision of such services – which in turn seems to have led to a reluctance among some aid organisations to hand their services over to government ownership. Similar concerns apply to the potential development of sustainable shock-responsive safety nets and other social protection mechanisms, to be extended to both refugee and host communities.
- In the context of restricted funding and specific mandates of international agencies, plus the purported temporary nature of their presence, interlocutors have emphasised that private sector investment in refugee settlements and their hosting districts is key to ensure the sustainability of the CRRF approach. Until now however, there has been insufficient engagement and investment of the private sector in these areas, compounded by concerns as to the potential negative consequences of their profit-making incentives on vulnerable populations.
- KIs alerted that policies and programmes need to take population growth into account; needs might increase as both host and refugee populations continue to grow, potentially putting more pressure on services and infrastructure, as well as on resources (land availability, and negative effects on the environment).

Exit strategies and durable solutions

The CRRF does not envision the departure of international actors from the refugee response in Uganda; there is thus no clearly-defined exit strategy for the international community. Indeed, with ongoing conflicts and insecurity in several of the neighbouring countries, it is unlikely that refugee inflows will cease, and the need for international actors, both humanitarian and development, will likely remain. In this context, transition of essential services to government ownership certainly does not represent an exit strategy. Attention should however be given to re-defining and adapting the role of international actors in the framework of the CRRF, perhaps through less direct implementation, and more support through local actors (government and civil society) and to capacity development.

Of the three traditional durable solutions, voluntary repatriation at scale is currently not an option for refugees from South Sudan and DRC, and third-country resettlement is not happening at a sufficiently large scale. In any case, it is unclear whether the government or international community in Uganda have any significant role to play in voluntary repatriation and resettlement, despite them being two of the five pillars of the CRRF in Uganda. The third durable solution, the integration of refugees, involving the provision of citizenship, is not foreseen under the CRRF in Uganda; instead, it is re-defined as resilience and self-reliance, which is proposed under the GCR as a viable interim solution – and which is strongly supported by the first three pillars.

V. RECOMMENDATIONS

The evaluation has resulted in the elaboration of multiple recommendations and suggested adaptations to the institutional structures and implementation strategies of the CRRF in Uganda. These recommendations, developed in consultation with stakeholders and endorsed by the CRRF Reference Group, are intended to build on the solid work and achievements, which have already been attained, and to nurture further progress towards the overall objectives of the CRRF. These recommendations have been compiled and consolidated, drawing on the different consultations held, the document reviews, and the conclusions set out in the previous chapter.

Generally, if Uganda is to maintain its reputation as a global standard-bearer for the application of the CRRF, both the Government and its international partners need to demonstrate their continued commitment to its implementation in Uganda, and their accountability to refugee populations and host communities. The international donor community, both humanitarian and development partners, should continue to prioritise Uganda, sustaining their joint efforts in the overall refugee response, and increasing their financial contributions, particularly against the SRPs and in support of government-led service delivery. The Government of Uganda should instill a more robust "whole-of-government" approach to resolving the refugee crisis and maintain attention and dedication of financial and human resources to the CRRF institutions (notably to the Secretariat, the SRP Secretariats, and the Refugee Engagement Forum), to enhance their sustainability and increase government ownership.

The Steering Group should review the Strategic Direction, the NAP, with their M&E frameworks and work plans. This should include:

- A review of the ToR of the Steering Group and Secretariat.
- The alignment with the broader policy and coordination processes
- The definition and scope of the CRRF

Specific recommendations are outlined below and have been organised according to the structure of the overall report, firstly by process and its different dimensions, then by implementation and results.

Planning and policy processes

- The CRRF Steering Group and Secretariat, in coordination with MDAs, and in particular the NPA, should promote better coherence between the different CRRF-specific policies and plans, and their alignment to national-level policies and plans. This will encompass the NAP, the Strategic Direction and the SRPs, and the NDPs, the DDPs and the RRPs. Mid-term reviews of the SRPs should be institutionalised (and financed) and would provide a timely opportunity to address the issues raised below.
    - Particular attention should be paid to the continued alignment of the SRPs to the programme-based approach of the NDPs, ensuring the full integration of refugees into NDPs 3 and 4 and their PIAPs. This process should fully involve the NPA, with a broader inter-agency consultation under the overall lead of the CRRF Secretariat.
    - The CRRF Secretariat, should ensure greater alignment between the SRPs and the national sector plans, and between the SRPs and the NAP and Strategic Direction, to ensure they promote a common and coherent vision.

- • There is a need for greater coherence between the SRPs across multiple criteria, including the use of needs assessments, alignment with existing policies and plans, the geographic scope of the plans, the inclusion of humanitarian and development needs, the coverage of host communities, and the availability of an implementation plan and M&E framework.
  - • The CRRF Secretariat, together with the humanitarian and development community, should ensure the alignment of, and clarify the respective roles and responsibilities between, the RRP and the different SRPs, to ensure that both humanitarian and development needs are properly covered.

- The CRRF Steering Group should specify the geographic scope of the CRRF, addressing transit districts and urban centres. Host community targeting within RHDs will require more systematic data collection and analysis to inform a needs- and vulnerability-based approach. Flexibility will be required on the geographic coverage of the different SRPs, taking into account their different sectoral specificities. All relevant planning and policy documents should clearly define their geographic coverage and include definitions of both the refugee and the host population.

- The CRRF Steering Group should clarify the thematic scope of the CRRF, including the coverage of each CRRF pillar.

- The Ugandan government and its MDAs, supported by the CRRF Secretariat, should ensure better integration of protection, gender and environment in the SRPs. Protection, gender, and environment should all be better mainstreamed across existing SRPs and future policies / strategies. Donors could consider establishing a minimum % allocation for clearly defined environmental measures; all programmes and projects should include an "environment marker" and a full Environmental Impact Assessment.

- The CRRF Steering Group should provide clarity on the status of the Refugee Policy referred to in the NAP 2021-2022's Annual Workplan, output 1.1.1, as well as on the EAC's Refugee Response Plan.

- The Settlement Strategy should be revisited, finalised and institutionalised as a priority, to better streamline and standardise the establishment and management of refugee settlements under a common approach and address agricultural livelihoods needs; this should take into account the Parish Development Model, and entail the full involvement of the Ministry of Housing, Land and Urban Development, the National Planning Authority, as well as OPM and the Ministry of Local Government.

- A comprehensive Transition Strategy and guidelines should be developed for the handover of essential service provision and facilities to GoU ownership, including commitments to predictable and sustained funding and other technical support from international donors, in line with the concept of international burden-sharing.[131] This issue is included in the Secretariat's Annual Workplan 2022[132], and deserves the full and prioritised attention of the Steering Group.

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[131] This strategy should take into account existing transition plans at the sector and district level.
[132] OPM (2021) CRRF Annual Workplan 2022, pillar 3, output 2.1

- The Private Sector Engagement Strategy should be revisited, finalised and institutionalised under the Ministry of Finance, Planning and Economic Development, to enhance engagement with the private sector.

- A Localisation strategy should be developed under the guidance of the Localisation Task-Force, strengthening the role of local and national assistance providers in the refugee response.

CRRF Coordination

- The Government of Uganda should more clearly demonstrate and, where possible, quantify their continued commitment to the CRRF by providing commensurate levels of financial and human resources to its implementation, in particular to the SRPs.

- The Government of Uganda, supported by the CRRF Secretariat, should broaden the engagement of additional MDAs in the roll-out of the CRRF in Uganda, nurturing a "whole-of-government approach", beyond the line ministries directly responsible for the SRPs. This would notably include the Ministry of Finance, the National Planning Agency, the Ugandan Bureau of Statistics, the Ministry of Internal Affairs, the Ministry of Foreign Affairs and the Ministry of Housing and Urban Development, and clearly define their respective roles and responsibilities in the foreseen Engagement Strategy of the CRRF.

- The CRRF Secretariat should work together with MDAs and the International Community to prioritise, rationalise and develop better efficiencies between the different coordination fora, working groups and meetings, and ensure their realignment towards NDP 3.

- The Ugandan government, supported by the CRRF Secretariat, should develop and ensure better alignment between the national level and district level. In particular, The Secretariat should raise more awareness about the CRRF at district level and the contextualisation of available plans, policies and processes to ensure their relevance and implementation at district level. The proposed Accelerated Action Plans should be systematically implemented in all newly created RHDs, and induction workshops rolled out in all RHDs.

- In line with the CRRF Secretariat's *Issue Paper on Strengthening District Coordination*, the Ugandan government, supported by the CRRF Secretariat, should enhance the representation of DLGs and lower tiers of government at national level, and increase their involvement in decision-making processes, including on financial allocations from central to district level. In this context, the proposed District Engagement Forum could be a vehicle moving DLG involvement forward.

- Attention should be given to the operationalisation of the OPM-UNHCR-MoLG MoU, enhancing the coordination and implementation of the CRRF at district level, for example through dedicated CRRF focal points for each district.

- Efforts should be made by all stakeholders to enhance the representation of local and national NGOs, as well as vulnerable refugees and host community members (e.g., youth, persons with disabilities, and older persons), in national and sub-national coordination mechanisms.

- The Ugandan government should seek to further optimise its coordination with, and leverage of, IGAD's regional engagement framework for refugees. This should entail mobilising resources, exchanging knowledge and good practices, showcasing achievements, and advocating among IGAD Member States to address the root causes of displacement and to help facilitate voluntary return.

- The CRRF Secretariat should develop a National CRRF Engagement Strategy, aimed at improved awareness and buy-in of CRRF stakeholders, and inter-institutional relationships and coordination. It could incorporate a Communications and Outreach Strategy (see below) and a resource mobilisation strategy. To ensure this, an Engagement Advisor (currently a vacant position at the Secretariat) should be recruited, with a ToR that could also address communication and resource mobilisation as well, although work on this engagement strategy could already be started in the absence of this recruitment.

- Within the Engagement Strategy, an updated CRRF Communications and Outreach Strategy should be developed and launched, to include MDAs, DLGs, UN Agencies and NGOs among its current 'primary audiences' of host communities and refugees, policy makers and opinion leaders, and funders and donors, and to promote genuine two-way engagement with and between these stakeholder groups. Attention should also be given to better engaging the private sector and academia. Furthermore, the new strategy should pay additional attention to CRRF pillars 4 (expanded solutions) and 5 (voluntary repatriation), which are currently neglected relative to pillars 1, 2 and 3. Finally, it should identify 'goodwill ambassadors' who can represent the achievements of the CRRF in Uganda on the international stage, in line with the ToR of the Steering Group.

CRRF architecture

The respective roles and specific ToR of the different CRRF institutions, notably the Steering Group, the Secretariat, the SRP Secretariats, the REF and the forthcoming District Engagement Forum, need to be re-calibrated and communicated.

- **CRRF Steering Group**
    - The Steering Group meetings need to be more strategic, allowing for high-level decision-making, which requires sufficient preparation time before the meetings and the clearance of technical issues by the Secretariat with the involvement of relevant stakeholders.

    - Attention needs to be given to ensuring an appropriate level of participation and balanced and consistent representation of all stakeholder groups at the Steering Group meetings.
        - Particular attention needs to be given to providing more time and space to refugee and host community voices – through the REF and District Engagement Forum representatives – at the Steering Group to provide feedback on current challenges, and unmet needs.
        - Attention needs to be paid to engaging the private sector, through the PSFU, at the Steering Group.

- The CRRF Secretariat should strengthen the mechanism to allow for the systematic follow-up on recommendations and decisions adopted by the Steering Group.

- The former practice of organising Steering Group meetings at district level, with associated joint field visits, should be reinstated when conditions allow.

- **CRRF Secretariat**
  - While the CRRF Secretariat has played a vital role in the creation of CRRF-relevant documents and institutions, the CRRF is now entering a new phase in Uganda, focused on the implementation and operationalisation of what has already been developed, implying that the function of the CRRF Secretariat itself will need to be adapted, including its mandate, responsibilities, structure, and the skillset of its staff members. In line with the current status of CRRF implementation, the Secretariat should focus more on the alignment of plans, policies, and (financial) reporting and M&E systems, as well as the creation of cross-cutting guidelines, resource mobilisation, and support to MDAs and DLGs in the implementation of the developed plans and policies.

  - A revised and more comprehensive ToR should be elaborated, clarifying the Secretariat's mandate, and detailing clear tasks and responsibilities, clear hierarchies and clear reporting or coordination lines to OPM, line ministries and other MDAs. The ToR should also provide for a clearly mandated, dedicated leadership: a director position that is 100% time-dedicated to the position. This revised ToR should be clearly communicated to all CRRF stakeholders.

  - In this configuration, the CRRF should focus on the alignment of plans, policies, (financial) reporting and M&E systems, support to MDAs and DLGs, as well as the creation of cross-cutting strategies and guidelines (e.g., transition, resource mobilisation, localisation, settlement strategy etc).

  - The legal positioning and housing of the CRRF Secretariat in the government's system needs to be clarified, formalised, and communicated. In addition, regardless of its legal positioning, deliberate efforts need to be undertaken by both the CRRF Secretariat and OPM DoR to better communicate, coordinate, and harmonise approaches, for example by systematising meetings between the DoR Commissioner and the CRRF Secretariat Director, or by organising joint retreats, to ensure the two entities take a joint approach to the implementation of the CRRF.

  - In line with expected budget reductions for the CRRF Secretariat, it is recommended that the Secretariat be re-calibrated through better adapted skill sets, embedded in updated staff ToR, and dedicated 100% to newly assigned roles (the same goes for CRRF focal points in ministries and at local government level). The government should provide more human and financial resources to the Secretariat, with staff seconded from different MDAs (i.e. not only from OPM).

  - Given resource constraints, and to still be able to ensure fully dedicated positions, the Secretariat should combine certain functions and develop ToR accordingly. For example:
    - One external engagement, communications, and resource mobilisation focal point;

- One technical M&E, resource tracking and knowledge management focal point;
- One policy expert focused on the development of cross-cutting policies and guidelines in coordination with relevant MDAs.

- There should be gender-related expertise and capacity development across the Secretariat, potentially with a dedicated gender expert, to ensure the proper mainstreaming of gender throughout the Secretariat's work, including gender-integrated M&E frameworks.

- The international community, and in particular its secondees at the Secretariat, should invest in more training and capacity development of their national CRRF Secretariat staff, ultimately aiming towards less reliance on these international secondees or consultants.

- The Secretariat should ensure more robust engagement with DLGs, including through field visits to promote the understanding and ownership of the CRRF at district level.

- **Refugee Engagement Forum**
  - The REF should be provided sufficient time and space at the Steering Group for their voice to be heard; this could be part-addressed by the establishment of a standing agenda item for the REF, or an annual Steering Group meeting specifically focused on the REF.

  - The REF needs to ensure more rigorous and structured feedback from the Steering Group meetings to the refugee communities they themselves represent and should be given feedback from other Steering Group members on how the points they raised in meetings are being followed up.

  - Efforts should be made to increase REF participation in other coordination platforms and with bilateral partners, as well as at district-level and in the development of DDPs, to ensure that refugee voices are mainstreamed throughout all key decision-making processes in the refugee response.

  - The REF should be properly resourced to be able to fulfil its potential.

- **District Engagement Forum**
  - There is a critical need to formalise and institutionalise the District Engagement Forum, so as to ensure better awareness and proper representation, engagement and ownership of all districts that host refugees, whether in formal settlements, transit centres or urban areas. This will also help promote the rollout and implementation of SRPs at district-level, in all districts.

  - In line with the creation of the District Engagement Forum, the Secretariat should ensure more robust engagement with DLGs, including through field visits, trainings, and workshops, to promote the understanding and ownership of the CRRF at district level.

- • A mechanism for interaction between the REF and the District Engagement Forum should be developed jointly by OPM and the MoLG.

Resource mobilisation and financial tracking

- The CRRF Secretariat should expedite the development of a resource mobilisation strategy, in line with the ToR of the Steering Group, and as foreseen in its own 2021 and 2022 Annual Workplans. This should be embedded in the recommended Engagement Strategy.

- A single "one-stop shop" systematic and transparent financial reporting mechanism should be developed, implemented, and transparently used by development partners. The mechanism should be managed by the Ministry of Finance, Planning and Economic Development, and should be designed to allow reporting against the NAP, the Strategic Direction and the different SRPs. This objective could be further implemented by taking the following actions:

  - • Creating an open dialogue between the international donor community and the government about reporting constraints for international donors and how to alleviate them (e.g. making reporting simpler and more streamlined), which could occur through the National Planning Forum.
  - • Provision of technical expertise by the international community to the development or strengthening of the AMP, and the potential inclusion of a 'CRRF tagging system' or marker to be included in all donor programme proposals and reports.
  - • Creation of better linkages and alignment between reporting systems (e.g. with ActivityInfo and URRMS) to ensure their inter-operability.

- The UN and NGOs should commit to systematic reporting and information-sharing at district-level to ensure awareness among DLGs and to empower them to better identify gaps and needs, and plan and budget accordingly.

- The Government of Uganda should dedicate more financial and human resources to CRRF institutions (e.g. the CRRF Secretariat and SRP Secretariats, and REF) to enhance their sustainability and increase government ownership.

Monitoring and evaluation

- The CRRF Secretariat needs to ensure greater awareness among government and international stakeholders of the NAP and Strategic Direction; the detailed work plan of the 2021-2022 NAP and the broader M&E framework in the Strategic Direction are insufficiently known or utilised. The next NAP is foreseen to cover the period 2023-2024 – work on elaborating this, and its concomitant work plan should commence as early as mid-2022 to ensure continuity, and to identify those outputs which require increased attention, energy, and financing.

- The Inter-Sector Dialogue process should be further cultivated as a potential mechanism for systematic reporting on the progress and achievements of the CRRF, particularly of the SRPs.

- An online repository of documents, studies, and learning tools about the CRRF in Uganda should be established and made publicly accessible.

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- Joint assessment and monitoring visits should be institutionalised at district-level, involving the Secretariat, OPM, DLGs and sector leads. This will require capacity-building and additional budgets, to carry out additional data collection and analysis, as well as monitoring of activities.

Progress towards the CRRF pillars

- The Steering Group, Secretariat, and international community should ensure that continued attention is given to ongoing and unmet emergency humanitarian needs under CRRF Pillars 1 (Admission and rights) and 2 (Emergency response and ongoing needs).

- Humanitarian actors should stay engaged in livelihoods support under CRRF Pillar 3 (Resilience and self-reliance) while gaps remain, with a particular focus on income-generating activities, and in close coordination with development actors and, where possible, the private sector.

- Development Partners must continue to deliver on previous financial pledges and commitments and report on their financial contributions to the CRRF in Uganda, and ensure continued and predictable funding, under CRRF Pillars 2 (Emergency response and ongoing needs) and 3 (Resilience and self-reliance), at a level sufficient to allow the sustainable delivery of integrated service provision by the government.

- Consideration should be given to revising the current ratio of assistance to refugees and host communities to a needs- and vulnerability-based approach. This could include cash transfers in a first stage, pending the development of shock-responsive safety nets which cover both refugees and vulnerable Ugandans living in RHDs.

- Consideration should be given as to how the government and the international community in Uganda can best address CRRF Pillars 4 (Expanded solutions) and 5 (Voluntary repatriation) – possibly through the elaboration of a strategic advocacy plan to be communicated to donor capitals, and regional governments. More broadly, the Steering Group should revisit whether the CRRF has a role to play in Pillars 4 and 5, and if so, what this role should be.

- A full evaluation of impact of the implementation of the GCR / CRRF in Uganda should be undertaken in 2025. This could be complemented by a specific study on the economic value so far added to Uganda by the refugee response. Appropriate time and resources should be dedicated to this evaluation.

ANNEXES

Annex 1: Bibliography

Atamanov, Beltramo, Reese, Rios, Abril & Waita (2021) *One Year in the Pandemic : Results from the High-Frequency Phone Surveys for Refugees in Uganda.* World Bank, Washington, DC.

BBC (2016) Uganda: 'One of the best places to be a refugee'. *BBC News,* 13 May 2016. Available here.

Betts (2021) *The Wealth of Refugees.* Oxford, UK: Oxford University Press.

Bridgespan Group and IFC (2019). *Private Sector & Refugees: Pathways to Scale.* Washington DC: IFC

DRC, IRC & NRC (2021) *The Global Compact on Refugees Three Years On: Navigating barriers and maximizing incentives in support of refugees and host community.* Available here.

Education Cannot Wait (2022) Uganda: Children of Hope. Available here.

Hesemann, Desai & Rockenfeller (2021) *Financing for refugee situations 2018-2019,* OECD Publishing, Paris. Available here.

Hovil (2018) We need a more honest discussion of Uganda's 'model' refugee policies. *Refugees Deeply*, 22 October. Available here.

Idris (2020) Integrated approaches to refugee management in Uganda. *K4D Helpdesk Report.*

IMPACT (2020) *SOPs for Data Collection during COVID-19.* Available here.

IFC (2021) *Consumer and Market Study in Southwest and West Nile Refugee-Hosting Areas in Uganda,* available here.

Ministry of Education and Sports (2018) *Education Response Plan for Refugees and Host Communities.*

Ministry of Energy and Mineral Development (2020) *Sustainable Energy Response Plan for Refugees and Host Communities 2022-2025: Inception report.*

Ministry of Energy and Mineral Development (2021) Sustainable Energy Response Plan for Refugees and Host Communities 2022-2025: Draft Version November 2021.

Ministry of Gender, Labour and Social Development (2021), *Jobs and Livelihoods Integrated Response Plan for Refugees and Host Communities.*

Ministry of Health (2019) *Health Sector Integrated Refugee Response Plan (2019-2024)*

Ministry of Local Government's *Implementation Guidelines for Parish Development Model* (June 2021).

Ministry of Water and Environment (2020), *Water and Environment Sector Response Plan for Refugees and Host Communities*

OPM (2015) *Concept Paper for the Settlement Transformative Agenda project 2016-2021.*

OPM (2018) *Communications and Outreach Strategy 2018/20: Comprehensive Refugee Response Framework (CRRF) Office of the Prime Minister.* Available here.

OPM (2018) CRRF Secretariat: Strengthening District Coordination. *Issue Paper #1.* CRRF Secretariat, April 2018.

OPM (2020) *Annual Workplan 2021: CRRF Secretariat.*

OPM (2020) *Strategic Direction and National Plan of Action: District Engagement and Coordination.* Presentation to the CRRF DPG Sub-group meeting, 25 November 2020

OPM (2021) *Annual Workplan 2022: CRRF Secretariat.*

OPM (2021) *CRRF National Plan of Action 2021-2022.*

OPM (2021) *CRRF Strategic Direction 2021-2025.*

OPM (2021) *Investing in Local Humanitarian Action: CRRF Task Force and Road Map Concept Note.*

OPM (2021) Minutes of the 14th CRRF Steering Group Meeting held on 6th October 2021, at Golf Course
Hotel, Kampala.

OPM (2022) *CRRF Annual Report 2021.*

OPM (2022) *Settlement Transformative Agenda II 2022-2025: Draft STA.* January 2022.

OPM (n.d.) Comprehensive Refugee Response Framework Uganda [website], accessed March 2022.
Available here.

Pincock, Betts & Easton-Calabria (2020) *The Global Governed? Refugees as Providers of Protection and*
Assistance. Cambridge: Cambridge University Press.

Pozhidaev (UNCDF) (2017) *Private Sector Engagement in the Refugee Response in Uganda: A Business*
Case. Available here.

Research & Evidence Facility (2020) *Comprehensive Refugee Responses in the Horn of Africa: Regional*
Leadership on Education, Livelihoods and Durable Solutions. London: EU Trust Fund for Africa
Research and Evidence Facility. Available here.

RINGO (2018) *Operationalization of the localization agenda in Uganda: A paper prepared for*
presentation to the CRRF steering committee.

The Economist (2021) Rationed out: Refugees in east Africa go hungry as funds dry up. *Middle East &*
Africa, 7 August. Available here.

The Independent (2022) Refugees and environmental degradation. *NEWS ANALYSIS*, 7 February
2022.
Available here.

U-Learn & the REF Task Force (2021) *Refugee Engagement Forum in Uganda: Good Practice Study*,
Available here.

UNHCR (2019) *Comprehensive Refugee Response Framework: The Uganda Model.* Available here.

UNHCR (2019) *Global Compact on Refugees: Indicator Framework.* Available here.

UNHCR (2021) Refugee Statistics: Key indicators [website], accessed March 2022. Available here.

UNHCR (2021) Operational Update: Uganda, 1-31 October 2021.

UNICEF (2021) *Documentation of UNICEF Uganda Country Office (UCO) Contribution to the*
Comprehensive Refugee Response Framework (CRRF).

UNHCR (2021) *Global Compact on Refugees: Indicator Report.* Available here.

World Bank and FAO (2019) Rapid Assessment of Natural Resource Degradation in Refugee Impacted
Areas in Northern Uganda: Technical Report. Available here.

World Bank and FAO (2020) *Assessment of Forest Resource Degradation and Intervention Options in*
Refugee-Hosting Areas of Western and Southwestern Uganda. Washington DC: World Bank
Group. Available here.

Zhou, Grossman & Ge (2022) Inclusive refugee-hosting in Uganda improves local development and
prevents public backlash.

Annex 2: Detailed overview of research questions

Policy: To what extent and how has the CRRF supported the Ugandan government and other key stakeholders in the adoption of refugee-related policies and planning processes?

- To what extent and how has the CRRF shaped the adoption of refugee-related policies and planning processes by the Ugandan government and other stakeholders?
- What is the number and scope of planning and policy documents adopted in line with the CRRF?
- What is the effectiveness and uptake of planning and policy documents adopted with the support of the CRRF?
- What are the remaining planning or policy gaps that the CRRF needs to help address to be able to strengthen the response to refugees and host communities?

Organizational: To what extent and how has the CRRF affected the organization and coordination of the refugee response in Uganda?

- To what extent has the CRRF been effective in promoting a whole-of-government approach?
  - To what extent has cooperation between OPM and line ministries improved since the adoption of the CRRF?
  - To what extent has cooperation improved between national-level and district-level response actors since the adoption of the CRRF?
- To what extent has cooperation improved between humanitarian and development actors since the adoption of the CRRF?
- To what extent has there been a transition from humanitarian towards development interventions since the adoption of the CRRF??
- How effective has the CRRF coordination model been in supporting refugee and host community coexistence and communication with the broader Ugandan community?

- Are there any barriers or bottlenecks to national or sub-national coordination between CRRF stakeholders and how should they be addressed?

Institutional: What has been the effectiveness of the institutional framework of the CRRF in advancing the CRRF's goals?

- How effective has the CRRF national arrangement / architecture (CRRF Steering Group, CRRF Secretariat, Steering Committees and Secretariats for sector plans, CRRF Development Partners Group and the Refugee Humanitarian Partners Group) been for all stakeholders?
- How effective is the Uganda CRRF model compared to CRRF models in other countries?

Financial: To what extent and how has the CRRF enabled the mobilization, identification and tracking of (additional) financial resources for the refugee response?

- Do adequate frameworks and strategies to ensure the financial tracking and alignment of international funding with sector plans exist?
- Do adequate frameworks and strategies to ensure coherent funding exist?
- How have resources been mobilised under the CRRF model compare to previous refugee financing strategies?
- Has the CRRF supported a shift of resources from humanitarian to development financing?

Technical: To what extent and how has the CRRF supported the planning and monitoring of refugee programmes in the response?

- What effects have the CRRF integrated planning processes had on the way of working of CRRF actors, by stakeholder type (government, development actors, humanitarian actors and donors)?
- How effective are existing refugee and development monitoring mechanisms to measure CRRF progress?

Results

- What key results have been delivered for refugees and host communities since the adoption of the CRRF?

- To what extent has progress been made towards the pillars of the CRRF in Uganda?

- What has been the impact of the different Sector Response Plans?

- How has the CRRF approach improved efficiencies in the delivery of results?
- How has the CRRF improved the involvement of non-traditional stakeholders in refugee and host community responses at all levels?
- What has been the impact of COVID-19 on the process and deliverables of the CRRF in Uganda?
- What are the key recommendations for the future of the CRRF in Uganda?

Annex 3: List of organisations interviewed

This list provides an overview of all institutions invited for an interview and interviewed at international, national and sub-national level.

Institution	Number of KIs invited	Number of KIs interviewed
Government	**57**	**48**
District Local Government	**19**	**19**
Ministries, Departments and Agencies	**19**	**12**
Ministry of Gender, Labour & Social Development	3	3
Ministry of Education and Sports	3	2
Ministry of Energy and Mineral Development	1	1
Ministry of Lands, Housing and Urban Development	1	1
Ministry of Water and Environment	2	1
Ministry of Works and Transport	1	1
Ministry of Local Government	1	1
National Planning Authority	1	1
Uganda Bureau of Statistics	1	1
Ministry of Foreign Affairs	1	0
Ministry of Finance, Planning and Economic Development	1	0
Ministry of Health	1	0
Ministry of Internal Affairs	1	0
Ministry of Trade	1	0
Office of the Prime Minister - Department of Refugees	**11**	**9**
Office of the Prime Minister - CRRF Secretariat	**8**	**8**
UN & NGOs	**31**	**23**
UN agencies	**22**	**15**
UNHCR	12	7
UN Women	2	2
UNDP	2	2
UNICEF	2	2
ILO	1	1
WFP	1	1
FAO	1	0
UNRC	1	0
INGOs	**7**	**7**
ACF	1	1
CRS	1	1
DRC	1	1
FCA	1	1
HI	1	1
LWF	1	1
World Vision	1	1
NNGOs	**2**	**1**
CAFOMI/Humanitarian platform	1	1
NGO forum	1	0
Donors & IFIs	**18**	**11**
GIZ	3	3
World Bank	4	2

ECHO	2	1
Denmark	1	1
EU	1	1
FCDO	1	1
Germany	1	1
USAID	1	1
Belgium	1	0
Embassy of Ireland	1	0
JICA	1	0
KFW	1	0
KIs based outside of Uganda	**7**	**4**
GIZ	1	1
UNHCR	1	1
DRC	1	1
UNICEF	1	1
African Union	1	0
IGAD	2	0
Other	**13**	**13**
Research	**9**	**9**
U-LEARN	6	6
REACH	1	1
Response Innovation Lab	1	1
Research and Evidence Facility	1	1
Refugee Engagement Forum members	**3**	**3**
Private sector	**1**	**1**
Private Sector Foundation of Uganda	1	1
Grand Total	**126**	**99**