



Thematic Papers on Fragile and Forced Displacement Contexts

Recommendations for the World Bank Group and Other Investors

Working Papers

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About InterAction

Founded in 1984, InterAction is the largest U.S.-based alliance of international NGOs and partners. We mobilize our Members to think and act collectively to serve the world's poor and vulnerable, with a shared belief that we can make the world a more peaceful, just, and prosperous place—together.

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AUTHORS

Early Childhood Development

Authors: Elana Banin and Lauren Post (International Rescue Committee)

Peer Reviewers: Lucy Bassett (University of Virginia) and Jamie Weiss-Yagoda (International Rescue Committee)

Labor Market Access

Authors: Emily E. Arnold-Fernández (Asylum Access), Neha Misra (Solidarity Center) and Sarah Miller (Refugees International)

Peer Reviewer: Jennifer Gordon (Fordham Law School)

Access to Housing, Land and Property Rights

Author: Katrien Ringelé (Norwegian Refugee Council)

Peer Reviewers: Jim Robinson (Global Protection Cluster) and Jamila El Abdellaou (HLP Expert)

Legal Identity

Author: Fernando de Medina-Rosales (Norwegian Refugee Council)

Peer Reviewer: Emily E. Arnold-Fernández (Asylum Access),

Applying an Age, Gender, Disability and Diversity Lens

Author: Stephanie Johanssen (Women's Refugee Commission)

Peer Reviewer: Rachel Burton (Bank Information Center)

EDITORS

Priscilla Yoon and Lissette Almanza (InterAction)

For more information, contact:

Kate Phillips-Barrasso, Director, Humanitarian Policy and Practice, InterAction | kparrasso@interaction.org

Lissette Almanza, Senior Program Associate, InterAction | lalmanza@interaction.org

Overview

The past decade saw forced displacement become more widespread and increasingly protracted. The number of displaced people doubled to [80 million](#) in mid-2020 from 41 million in 2010, and [77 percent](#) of refugees live in a situation that has lasted at least five years. The COVID-19 pandemic has become a risk multiplier for vulnerable groups interacting with other drivers of forced displacement like conflict, persecution, and climate change. The response to these growing and intersecting challenges requires close coordination to ensure complementarity in approaches, a focus on sustainable solutions for displaced populations and the ability to take principled humanitarian action.

The World Bank Group's (WBG) support to governments addressing the drivers and impacts of fragility, conflict and violence (FCV) and forced displacement crises has proved promising. Its recent efforts in forced displacement contexts have drawn together a range of actors to implement innovative combinations of legal, administrative, trade policy, and country financing mechanisms to strengthen institutional response to protracted refugee crises. Achievements include groundbreaking policy reforms for refugee rights and self-reliance in Jordan, Turkey, Kenya, Somalia, Ethiopia, and Uganda, among other countries.¹

Recent experience demonstrates that the WBG is uniquely positioned to leverage its financing mechanisms and credibility with governments to inform host governments' policies and implement initiatives that improve the lives of the forcibly displaced. However, this stepped-up engagement would further benefit from greater cooperation and knowledge sharing with an expanded set of stakeholders in the humanitarian, development, peace, and rights disciplines, including with NGOs that work across this spectrum.

InterAction's Forced Displacement Working Group (FDWG) developed five thematic papers to provide the WBG and other investors an overview of key considerations and actionable recommendations when engaging in fragile and forced displacement settings. Some papers highlight areas for improvement where the WBG has recent experience such as in **livelihoods** and cross-cutting initiatives like **gender and inclusivity**. Other papers highlight areas where the WBG could deepen its approach, such as investing in **early childhood development**, expanding **legal identity** systems that are inclusive and trusted, and promoting access to **housing, land and property** to realize sustainable solutions for refugees and internally displaced persons.

Swift action on these issues is critical to achieving the WBG's twin goals of ending poverty and promoting shared prosperity for all and for delivering on the 2030 Agenda commitment to "leave no one behind." Without proper action, fragility, crisis, and displacement will continue to threaten development gains and the well-being of millions of people around the world.

Although these papers focus primarily on refugee concerns, some address internally displaced persons (IDPs) and asylum seekers, where applicable. They are not intended to be an exhaustive survey of all issues related to forced displacement, only covering certain relevant thematic areas.

Overall, the papers focus on how the WBG's policy and programmatic interventions can be best focused to result in tangible change in the lives of affected communities and to ensure that no one is left behind. Among the recommendations put forth, the most consistent across the five thematic papers include:

¹ See pp 38-39 of World Bank. 2019. https://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/Forced_Displacement.pdf. Independent Evaluation Group. Washington, DC: World Bank.

- ▶ **Expand partnerships with NGOs and meaningfully engage refugees, host communities and local civil society** to strengthen institutional response and coordination. Among the IDA18 Regional Sub-Window for Refugees and Host Communities (RSW) projects, only four projects acknowledged the importance of partnerships with NGOs.
- ▶ **Conduct contextualized analysis of forcibly displaced populations and identify barriers** that hinder access to basic social services and economic opportunities. The analysis should include **socio-political aspects** and other non-legal barriers that impede displaced persons from accessing services and opportunities. The analysis should also identify where integrated approaches across relevant sectors are required. This can help the Bank better understand how to strengthen project interventions and identify areas where it can better support government policies and practices.
- ▶ **Share existing evidence and lessons learned in managing forced displacement crises** across Bank teams and external actors to build capacity and expertise for what works in a diverse range of fragile and forced displacement settings.
- ▶ **Leverage internal resources and knowledge to ensure a more coherent WBG approach is adapted for and applied to forced displacement settings.** The WBG has rich experience and extensive resources in addressing issues like gender and legal identity through a variety of frameworks, tools and initiatives. These resources should be expanded to cover the forcibly displaced in all their diversity. By harmonizing and improving linkages across resources within the WBG, programming and financing will be more effectively designed and implemented to respond to displacement challenges.

Early Childhood Development in Forced Displacement, Conflict and Violent Contexts

Considerations and Recommendations for the World Bank Group and Other Investors

Executive Summary

Children are some of the most vulnerable among the forcibly displaced, representing [50% of the world's refugees](#). With the average duration of displacement being [10 to 26 years](#), children often spend the bulk of their childhood and youth—including their critical learning years—without access to nutritious foods, access to healthcare or quality schooling, clean water, and safe spaces. Studies show that the early years of life is the most effective and cost-efficient time for interventions to ensure all children develop to their full potential. This window for influence, known as early childhood development (ECD), [encompasses](#) several developmental stages from conception to age eight during which a child acquires important cognitive, language, motor, social and emotional skills. However, chronic stress due to severe and prolonged exposure to adversity such as forced displacement, can disrupt healthy brain development and have damaging short- and long-term effects on learning, behavior and physical and mental health.

Humanitarian actors and development institutions like the World Bank Group (WBG), which is increasingly engaging in humanitarian contexts, have not sufficiently prioritized support for policies and programming to meet the unique learning and development needs of crisis-affected children. In 2018, less than 2% of humanitarian funding explicitly targeted the early years, of which a mere 5% was allocated to education. Of official development assistance (ODA), 3.3% went to early childhood development in emergencies, of which 1% went to education. While components of ECD can be found in nearly half of the [IDA18 Regional Sub-window for Refugees and Host Communities \(RSW\) projects](#), the programming approach is often too fragmented to effectively address the interrelated risks that threaten children's long-term development, learning and well-being. This ultimately presents a threat to the future stability and economic development of not just individual children, but of entire societies.

The WBG is uniquely positioned to help expand services for young children in displacement contexts by supporting policies that create an enabling environment for young refugee children's development, health, learning, productivity, and wellbeing. As it has already shown under the IDA18 RSW/IDA19 Window for Host Communities and Refugees (WHR), the WBG's direct relationships with governments, including line ministries, presents an opportunity for the WBG to leverage its financing and provide technical support to help end poverty, boost shared prosperity, and build human capital in countries in an evidence-based, cost-effective way: by investing in the early years.

InterAction, the United States' largest alliance of international NGOs and partners, strongly recommends the WBG support government clients who have prioritized early childhood development in fragile, conflict and violent settings (FCV). Specifically, it should:

Policy and Funding

- ▶ Work with governments to provide ECD in FCV settings through technical assistance and by identifying best practices, where there is demand. The WBG can provide long-term, dedicated financing to governments to support

the development of or reforms to national ECD policies and plans and to help coordinate ECD governance structures.

- ▶ Include ECD policies and the disaggregation of population cohorts by age in the Refugee Policy Review Framework.
- ▶ Work with government partners to include refugees in national COVID-19 response activities that address children's needs, including access to quality education.

Evidence Generation and Knowledge Sharing

- ▶ Generate evidence on ECD in FCV settings to better understand how national ECD policies, strategies, and institutions can be more inclusive of refugee populations or how FCV settings can benefit from investing in refugees' ECD.
- ▶ Evaluate existing ECD and education projects financed by the IDA18 RSW/IDA19 WHR and GCFF to generate evidence on what approaches to programs and policies can improve learning and development outcomes for children.

Coordination

- ▶ Identify shared goals and metrics for strengthening outcomes among the WBG's ECD and FCV teams to provide robust technical assistance and adequate investments.
- ▶ Consult and coordinate with humanitarian and ECD NGOs and UN agencies with technical expertise on early years in FCV settings on the above actions.

The Issue: Investing in Children's Early Years is Critical to More Stable Economies

Low Investments, High Risks

As articulated by the [Human Capital Project](#) and the [Nurturing Care Framework](#), ECD sits at the center of the humanitarian-development-peacebuilding nexus. Investing in the early years represents the critical foundation, allowing children to achieve necessary skills and future income and enabling countries to have stable economies. Investing in ECD policies and programs amid the uncertainty and instability of crises and displacement can lay a foundation for life-long success and resilience, social cohesion, and sustainable and peaceful societies. Early years investments can produce up to [13% return per year](#) by improving health outcomes, boosting salaries, improving the economy, and reducing a country's budget deficit.

Yet an estimated [43%](#) of children under five in low- and middle-income countries, including in humanitarian contexts, are at risk of not reaching their developmental potential. Refugee children are among the [highest risk](#) given their experiences and prolonged exposure to poverty, violence, deprivation and malnutrition. All of these factors can [trigger a toxic stress response](#) that disrupts healthy brain development, potentially leading to [life-long problems](#) in learning, behavior, and physical and mental health. [Learning Poverty](#) is also a substantial concern, as without a strong education base, students do not acquire the human capital they need to power their careers or the skills that will help them become engaged citizens and nurture healthy, prosperous families.

Financial Constraints Create Obstacles for ECD Services

Due to the threat that forced displacement poses to young children's learning and development, there is a significant gap in the delivery of quality early childhood interventions in crises. Many of the obstacles to better ECD outcomes in low- and middle-income countries can be directly traced to [domestic public financial management constraints](#). These financial constraints are amplified by the fact that ECD interventions often require a number of line ministries--spanning the health, nutrition, education, child protection and water, sanitation and hygiene sectors--to contribute from their budgets to ECD programming and coordinate on delivery. Without clear budget authority or oversight, governments often are unable to maximize outcomes or efficiently allocate limited funding. And even when ECD financing is prioritized and coordinated, dedicated support for crisis populations is often left out altogether. As a result, there is typically an inadequate provision of critical ECD services for refugee and displaced populations, further cementing development barriers, particularly for education, protection, and responsive caregiving.

Limited Funding in Global Aid and National Budgets for ECD

National budget gaps for ECD are mirrored in global and national humanitarian response plans and donor funding towards those plans. An [April 2018 review of 26 active Refugee Humanitarian Response Plans \(HPRs\)](#) found that only 58% mentioned nutrition interventions, fewer than 25% mentioned safety and security or health interventions, and even fewer mentioned interventions to support responsive caregiving or early learning. A [2020 analysis of international aid levels for early childhood services in crisis contexts](#) demonstrated that of the \$25.2 billion humanitarian aid flow reported by the UN OCHA Financing Tracking System in 2018, less than 2% (US\$463 million) explicitly targeted the early years, of which a mere 5% (\$23 million) was allocated to education. This is similarly reflected in official development assistance (ODA). Of the \$192 billion total international assistance in 2017 reported by the OECD Creditor Reporting System, 3.3% (\$6.3 billion) went to early childhood development in emergencies, of which 1% (\$63 million) went to education.

Consequently, there is only nascent rigorous evidence of what interventions actually improve development outcomes for forcibly displaced children. In addition, practitioners, policymakers, and donors do not have comprehensive information about how to invest the limited resources available, nor how much investment is truly required to meet needs. When evidentiary studies are conducted, [research has found](#) that it is possible for innovative low-cost programs to demonstrably improve a range of outcomes related to ECD and parenting behaviors.

Ultimately refugee children's learning, development, and well-being falls through the cracks. The lack of funding from national budgets and humanitarian responses, in addition to the limited evidence of what interventions produce efficient outcomes, means too little funding is allocated to ECD programming. Thus, there are insufficient resources or incentives to hire enough qualified workers to deliver early learning, maternal and child health programs, and provide parenting support and counselling to caregivers for displaced and refugee populations. A full set of [integrated](#) crisis-sensitive services across health, nutrition, education, sanitation, and child protection sectors are needed. These services must be designed, planned, and costed to be adaptable when preventing and responding to emergencies.

Considerations: WBG Uniquely Positioned to Improve ECD Policies, Plans and Programming

The Value of Prioritizing ECD Interventions in Humanitarian Settings

Increased WBG leadership on supporting young children in displacement contexts would align with the institution's priorities and financing. In a 2016 document, [Snapshot: investing in the early years for growth and productivity](#), the WBG recognized the importance and value of investing in early years, specifically that "investing in the early years is one of the smartest things a country can do to eliminate extreme poverty, boost shared prosperity, and create the human capital needed for economies to diversify and grow."

A 2018 paper, [Maximizing the Impact of the World Bank Group in Fragile and Conflict-Affected Situations](#), concluded "in emergency situations, through to recovery, quality education is considered to provide physical, psychosocial, and cognitive protection that can sustain and save lives, contributing directly to the social, economic, and political stability of societies." The Bank's recent [COVID-19 Crisis Response Approach Paper](#) and joint UNHCR-World Bank study, [Forcibly displaced in the COVID-19-induced recession](#), acknowledge urgent action is needed to address the impacts of the pandemic on vulnerable households, including displaced populations, and across a range of vulnerabilities including malnutrition, education, and diminished early childhood development.

Support Governments to Strengthen Policy Changes and Expand ECD Services

The WBG is uniquely positioned to support governments to expand services for young children in displacement contexts by supporting policies that create an enabling environment for young refugee children's learning and development. As it has already shown under the RSW/WHR, the WBG's direct relationships with governments, including line ministries, presents an opportunity for it to leverage its financing and provide technical support to help improve access to and the quality of education and ECD programming for both national and refugee populations.

There are several major challenges with ECD policies that governments need to overcome. First, many low-income countries do not have an ECD policy or coordinated national framework for children. New [policies and programs would have to be developed](#), or existing ones reformed, to ensure there are [accessible, quality public ECD services](#). Even when policies exist, they seldom include refugee or displaced populations. Second, ECD policies can be expressed in a number of ways and across various sectors (education, health, protection, etc.) as the WBG has already [acknowledged](#). There is no one established approach to [governance](#) of ECD systems, which typically require coordination across sectors and an adequate legal and regulatory environment. The WBG has [proposed](#) a framework for systematically examining national ECD policies, but more work is needed to ensure this framework is available to and used by national policy makers in humanitarian contexts.

The WBG's deeper engagement on ECD in humanitarian contexts can help generate change within the humanitarian response system. For example, the WBG could generate greater awareness among national policy makers on the need to embed ECD in needs assessments, response plans, programming, and monitoring and evaluation. A helpful first step would be increased coordination and collaboration among WBG staff (including FCV and Early Years teams, Country Directors, etc.) and UN Humanitarian and Resident Coordinators, UN lead agencies, education and protection cluster leads, and NGOs.

There are a number of relevant and useful models for ECD policies that can be built upon. For example, Uganda has a [National Integrated Early Childhood Development Policy](#) (2016), [Education Strategy](#) (2017-2020), and [Education Response Plan for Refugees and Host Communities](#) (2018) that address the needs of refugees and host communities to access early childhood interventions but which it lacks the financial support to fully implement. And Kenya has an [ECD Policy Framework](#) (2006) that addresses the fragmentation of ECD initiatives, which could be expanded to include refugee populations.

The Jordanian [Human Resources Development \(HRD\) National Strategy](#) 2016–2025, overseen by the Jordanian cabinet, positions early childhood education and development as one of its four central pillars. The HRD Strategy calls for a “comprehensive approach to policies and programs for children from birth to eight years of age.” While a holistic, cross-sectoral plan provides an excellent starting point, lessons can be learned from its poor implementation. For example, accountability has been inhibited by a lack of performance indicators, annual monitoring, and aligned financing. Cabinet ownership, a positive indication that ECD is a national priority, has ultimately led to a deflection of ownership and poor-quality management by the ministries. Another missed opportunity is the disconnection between the HRD Strategy and the Jordan Response Plan for the Syria Crisis (JRP); despite the national strategy, a holistic approach to ECD is absent in the JRP. While some ECD services, such as early education and vaccinations, are provided to Syrian refugees through the humanitarian system, other services such as psycho-social support are not.

Evaluate Existing Financing Mechanisms and Investments for ECD Interventions

In addition to engaging with ministries and other policymakers, the WBG also provides funding on a longer time horizon – often three to five years – than many other donors in displacement settings. Several World Bank financing mechanisms already offer this support for the design and implementation of ECD projects in low- and middle-income countries. Financing specifically dedicated to refugee contexts, however, does not prioritize ECD, and funding specifically for ECD does not prioritize fragile and displacement situations.

- ▶ *IDA18 RSW* projects address some components of ECD. In a preliminary analysis of how RSW projects have incorporated ECD, the International Rescue Committee found 8 out of 18 projects either directly identify ECD and education within the project goals or include ECD interventions, but do not identify them as specific to ECD (e.g., in Bangladesh’s Additional Financing for Health Sector Support Project [P167672]). The fact that nearly 45% of projects include ECD interventions indicates that host countries are at minimum recognizing early childhood needs. WBG instruments, including the next IDA replenishment document and the Refugee Policy Review Framework (RPRF), should name ECD as an explicit priority and offer it as a tool in its solutions toolbox.
- ▶ The *Global Concessional Financing Facility* (GCFF) also supports ECD in an ad hoc manner. Signature projects such as the Jordan Education Reform Support Program-for-Results names Early Childhood Education and Development as a primary strategic objective. Similarly, the Jordan Emergency Health Project allows the Government of Jordan to foster human capital outcomes, introducing activities to improve primary health care, with an emphasis on early childhood development. Yet it is unclear whether or how the GCFF is working with governments to integrate investments across all five components of ECD (education, health, nutrition, child protection and water and sanitation).
- ▶ The *Early Learning Partnership* (ELP) Trust Fund provides grants to Bank teams to work with governments on analysis, project design, and evaluation related to ECD, with the goal of expanding ECD investments in the future. This trust fund is not explicitly linked with funding through the IDA18 RSW, IDA19 WHR or the GCFF; however, it could ostensibly support projects funded by these mechanisms. For instance, the trust fund could support governments to identify gaps and opportunities in ECD programming and provide additional funding for ECD programs in FCV contexts.

Expand the Evidence Base on ECD Interventions

More evidence of what works to improve children's development and learning in fragile and displacement contexts is needed—as noted in a [2015 independent evaluation of the WBG's support to ECD](#). Several existing WBG mechanisms and technical guidance provide a solid foundation for pursuing a robust ECD agenda in fragile and displacement contexts. However, the WBG should consider going even further to better understand needs and to evaluate the impacts and implementation of interventions, including by supporting new Advisory Services and Analytics (ASA) on ECD in FCV context. The WBG could build on several existing efforts:

- ▶ The WBG-WHO-UNICEF [Nurturing Care Framework \(NCF\)](#) and related [Guidelines](#) provide a foundation for understanding ECD, establishing guidance about effective ECD policy and intervention outcomes. The [Nurturing care for children living in humanitarian settings](#) brief summarizes actions that program planners and implementers should take to minimize the negative impact crises can have on young children and their families. The brief identifies actions that can be taken at different phases of an emergency, with interventions adjusted based on the length and type of humanitarian, security, or displacement factors.
- ▶ The WBG's [Systems Approach for Better Education Results \(SABER\)-Early Childhood Development](#) initiative is designed to provide policymakers with the tools and analysis to identify areas in need of policy attention to promote healthy and robust development for all children. SABER is useful for fragile and displacement contexts in that it provides an accessible, objective country snapshot of ECD systems. This tool allows WBG staff and partners to evaluate countries' existing ECD policies and can help identify objectives for WBG assistance. However, the majority of these evaluations focus on stable settings and further work is needed to draw out similar conclusions for fragile and crisis settings as has been done in [Yemen](#).
- ▶ Lessons learned through the WBG's operations and partnerships with governments can inform implementation by other stakeholders working on early childhood in humanitarian settings. As a leader in the field of early childhood development and education, and its growing expertise in FCV settings, the WBG's knowledge and support is a critical asset for bringing development, humanitarian, and government actors together to achieve shared goals. The WBG's experience can help demonstrate what working with bilateral and multilateral donors as well as host governments to prioritize investments in ECD realistically entails.

Recommendations: Prioritize Early Childhood Development for Displaced Children

The WBG should expand its engagement and investment in ECD in fragile and displacement settings in the following ways:

Policy and Funding

- ▶ **Work with government clients to provide ECD in FCV settings through technical assistance and by identifying best practices** where there is demand. The WBG can support the development of or reforms to national ECD policies and plans and help improve the coordination of ECD governance structures.
- ▶ **Provide long-term, dedicated financing to host countries' national ECD systems, including for pre-primary and primary education** to both improve quality of services and support the inclusion of refugee populations. Invest IDA

WHR, GCFF and ELP Fund resources in ECD programs and policies as a way to reduce poverty, grow economies and build more peaceful societies. This should include an ELP-FCV financing round.

- ▶ **Include ECD policies and the disaggregation of population cohorts by age in the Refugee Policy Review Framework under the Access to National Services section** as well as in other FCV guidance and analysis.
- ▶ **Support government partners to include refugees in national COVID-19 response activities that address early childhood needs, including access to a quality education.**

Evidence Generation and Knowledge Sharing

- ▶ **Generate evidence on ECD in FCV settings** to better understand how national ECD policies, strategies, and institutions can be more inclusive of refugee populations and how FCV settings can benefit from investing in ECD. The WBG's comparative advantage in quality research and analytics would fill evidence gaps vital for supporting government response and policy dialogue.
- ▶ **To generate this evidence**, building on the analytical repository established for the Mashreq countries, conduct an **Advisory Services and Analytics (ASA)** and broadly disseminate **ELP-FCV funding round impact evidence** and implementation lessons.
- ▶ **Conduct rigorous evaluations of IDA18 RSW/IDA19 WHR and existing GCFF funded ECE and ECD projects -- or components of projects -- to identify what is working and at what cost to improve outcomes for refugees.** Refugees should be consulted throughout the evaluation.

Coordination and Stakeholder Engagement

- ▶ **Identify shared goals and metrics for strengthening outcomes** among the WBG's ECD and FCV teams to provide robust technical assistance and adequate investments.
- ▶ **Consult with early childhood development and humanitarian actors, including NGOs and UN agencies**, on the above actions to better ensure ECD policies and programs are appropriately tailored for and have a positive impact on refugee populations. For example, engagement with humanitarian needs assessment, planning, and response, which can be aligned with development practice as a means of ensuring coherence with overall national strategies.

Labor Market Access in Forced Displacement Contexts

Considerations and Recommendations for the World Bank Group and Other Investors

Executive Summary

Refugee populations often lack legal and/or practical access to labor markets. As a result, refugees are excluded from formal, semi-formal or de facto regularized informal work. This pushes them into exploitative and illicit employment and livelihoods options -- and depresses wages, working conditions, and other labor standards for all workers. A growing body of evidence demonstrates that economies suffer when refugees cannot fairly and equitably access labor markets.

As an expert agency trusted by governments, the WBG has a unique and vital role to play in strengthening institutional responses and engaging in policy dialogue to address the challenges the forcibly displaced face in fair and equitable access to labor markets. Ensuring refugees' equal rights as workers is an important component of economic growth and development: it improves national economic outcomes in refugee-hosting countries, reduces corruption and other crime, and safeguards all workers against exploitation. Advancing refugees' fair and equitable access to labor markets is critical to achieving the WBG's mission to end poverty and boost shared prosperity.

The WBG should prioritize refugees' fair and equitable labor market participation as a desired goal in all countries hosting significant numbers of refugees (e.g., 25,000 or more). Specifically, the WBG should:

- ▶ Examine barriers to refugees' labor market access when developing Country Plans and consider including projects that address those barriers.
- ▶ Draw on the technical knowledge and resources of the WBG's Fragility, Conflict and Violence (FCV) team at key moments, such as negotiation of country plans or project plans.
- ▶ Ensure refugees' international human rights and unique needs are addressed in Project Plans, including through direct consultation with refugee communities during development and implementation.
- ▶ Promote implementation of the International Labor Organization's (ILO) core labor standards and implementation of worker rights legal aid for all workers, with a focus on refugees and other marginalized workers.

The Issue: Labor Market Access Requires Removing Barriers and Enforcing Rights

State Policies Impede Refugees' Labor Market Participation

In the context of refugee populations, labor market access often requires significant reforms to government policy and practice. Unlike nationals, refugees do not have automatic access to livelihood options in the country where they reside. The current policies of some countries outright prohibit refugees from working; others impose steep bureaucratic or financial requirements for refugees to obtain work permits or require them to reside in camps or settlements far from employment opportunities, creating barriers that are insurmountable.

WBG has promoted sector-specific work schemes, in which a country allows refugees to work only in a few specific sectors (often in designated economic-benefit zones), but these schemes have a high incidence of failure. Such approaches often fail to attract refugee workers, who are rarely consulted in the development of these plans yet are central stakeholders in these schemes. For instance, in [Ethiopia](#) and [Jordan](#), refugees, NGOs and the broader civil society were not meaningfully consulted in the design of the sector-specific programs in which the WBG was/is involved. Without proper engagement, consultation and respect for refugee agency in the development and implementation of such programs, and disseminating information about these plans in ways that will reach these groups at the global and country level, the WBG and government partners risk limited success when implementing programs to boost economic growth and generate jobs for refugees.² [Sector-specific plans](#) can also undermine local labor laws, and may pit groups of workers (nationals, migrants, refugees, and others) against each other to the detriment of all.

Even where countries do not explicitly restrict refugees from working, their policies often are silent about refugees' right to participate in the labor market and their protections while doing so, which leaves employers, refugees, and host communities uncertain about refugees' rights as workers. Other policies not explicitly related to work, such as movement restrictions on refugees and asylum-seekers, also can impede access to labor markets.

State Practices Impede Refugees' Labor Market Participation

Policies are not the only barrier to refugees' labor market access. Lax enforcement of labor rights or discriminatory practices that focus on criminalizing refugee workers instead of protecting them against labor violations can keep refugees out of formal, semi-formal or *de facto* regularized informal work, pushing them instead into exploitative and illicit employment and livelihood options. For example, in Jordan, the local NGO Tamkeen has [documented](#) insufficient labor enforcement because of inadequate staffing, training, and technological tools. This, in turn, drives down wages, working conditions, and other labor standards for all workers. As with policies, state practices not explicitly related to work, such as detention or deportation of refugees and asylum-seekers, can prevent refugees from leaving exploitative labor situations, thus impeding the ability of all workers -- refugees, nationals, and others -- to access the labor market on fair and equitable terms.

State Policy and Practice Exacerbates Other Barriers to Labor Market Access

These problems are exacerbated by other factors that are affected by state action or inaction, both on policy and on implementation. Refugees often lack the social networks and informal protections available to nationals, which makes it harder for them to resist exploitative labor practices. Discrimination and xenophobia may also limit refugees' labor market access and encourage exploitation. Refugee workers may struggle to have professional credentials recognized across national borders. For refugee entrepreneurs, obtaining financing or owning assets may be difficult or impossible, due to policy barriers, lack of enforcement of rights, and confusion about the law (e.g., banks may not know whether and under what circumstances they are allowed to make loans to refugees).

While many workers may lack information, resources, support and/or power to effectively assert their labor rights, [research has found that](#) refugees overall tend to have less access to information, fewer resources and support, less access to collective agency (sometimes including exclusion from unions), and less power to meaningfully exercise their rights as

² For an overview on the implementation of the Jordan and Ethiopia Job Compacts which were supported financially by the World Bank, see Jennifer Gordon's *Refugees and Decent Work: Lessons learned from Refugee Jobs Compact* (2019).

workers. With humanitarian aid unsustainable, unavailable in some areas and chronically underfunded, [refugees often have no way to survive](#) other than to accept underpaid, unsafe, or abusive work environments -- which in turn pits them against nationals and diminishes labor standards for everyone, impeding poverty reduction and increasing social conflict.

By contrast, if a state establishes strong labor rights policies, prohibits discrimination in the application of labor standards, enforces labor standards rigorously and fairly, and provides or allows provision of legal support so refugees can assert their labor rights directly, refugees are far more likely to have fair, equitable access to the labor market. Increasingly, states from Ecuador to Ethiopia are making strides in this direction – one that aligns with and should be encouraged by the WBG as a means to achieve inclusive development in line with the Sustainable Development Goals (SDGs). With fair and equitable access, refugees can participate in labor markets in ways that contribute to economic well-being for everyone.

Considerations: WBG Can Identify Barriers, Dispel Myths, and Advance Solutions

The Refugee Policy Review Framework: A Tool to Identify Barriers

The WBG's own research demonstrates that refugee labor market participation, conducted on fair and equitable terms, can bolster economies.³ However, most states impose barriers that hinder refugees' labor market access and limit their rights as workers. These barriers can significantly undermine efforts by the WBG and others to reduce poverty, lessen corruption, and build markets.⁴ When considering how a refugee-hosting state can achieve its economic growth goals, an examination of refugee labor market access and participation is an important first step.

The recently developed Refugee Policy Review Framework (RPRF, created by the World Bank's FCV team) is a helpful and comprehensive tool for understanding the policy barriers and state practices that impede refugee access to labor markets.⁵ Data collected through this framework can support WBG-government dialogue and inform policy shifts to create enabling institutional environments. At a minimum, state policies regarding refugees' access to labor markets, freedom of movement and residence, and the rights of refugee workers must be examined. Additionally, the administrative systems related to legal status and identification, work and business permits, movement control, and access to legal support to address and prevent rights violations should be evaluated for their inclusion of and impact on refugees, using dual lenses of efficiency and equity. Finally, state enforcement of labor protections and workers' rights, as well as other state practices that impact refugees' access to fair and equitable labor market participation, should be reviewed.

WBG Projects Can Promote Positive Changes

Through institutional strengthening and coordination, the WBG can support states to catalyze changes that would benefit its citizens, refugees, and other residents, as well as improving the long-term economic outlook for the country as a whole.⁶

³ The World Bank's 2018 study, "Moving for Prosperity", concludes that allowing refugees to work formally contributes to the public finances of the host country. See Global World Bank Group. 2018. Moving for Prosperity: Global Migration and Labor Markets. Other studies also illustrate the economic benefits of including refugees in the labor market (see, eg. Asylum Access. 2014. Global Refugee Work Rights Report; Legrain P. 2016. "Refugees Work: A Humanitarian Investment That Yields Economic Dividends". Tent Foundation and Open Network; Clemens M., Huang C., Graham J. 2018. "The Economic and Fiscal Effects of Granting Refugees Formal Labor Market Access." Center for Global Development).

⁴ A 2014 study in Lebanon concluded that Lebanon's failure to include Syrian refugees in the formal labor market had dire repercussions for the overall national economy, including expansion of the informal sector, reduction in wages and worsening working conditions. These consequences affected not only refugees, but also the Lebanese community. Marsi, S. and Srour, I. 2014. "Assessment of the Impact of Syrian Refugees in Lebanon and Their Employment Profile", International Labor Organization.

⁵ Huang, C. and Post, L. 9 September 2020. World Bank's refugee policy review framework brings greater understanding and mutual accountability. Available at: <https://reliefweb.int/report/world/world-bank-s-refugee-policy-review-framework-brings-greater-understanding-and-mutual>

⁶ Countries who have undertaken reforms to facilitate greater labor market access for refugees may provide useful models for their peers. Some examples are discussed in Arnold-Fernández E. E. and Pollock S. 2013. "Refugees' rights to work". Forced Migration Review 44; and Betts A., Bloom L., Kaplan, J. D. and Omata, N. 2014. "Refugee economies: Rethinking popular assumptions." University of Oxford, Refugee Studies Centre, among other works.

These changes may be embedded in other WBG efforts, such as standardization of identity documents (a current priority for WBG in Mexico) or reforms that promote financial inclusion (a priority for WBG in Jordan and Egypt), or may stand alone, particularly in countries hosting the largest numbers of refugees (for example, the Prospects project in Ethiopia, in which World Bank is involved).

Through its deep expertise, the WBG has successfully influenced the policies and practices a national government considers or implements. For example, under the RSW the WBG facilitated the economic inclusion of refugees in [Ethiopia](#) through the [Economic Opportunities Program](#), which includes supporting policy reforms meant to enable refugees' access to labor markets by aligning goals and results that can lead to greater and more inclusive development. While there is [room for improvement](#), similar pilots like the one in Ethiopia have led to breakthrough policy reforms for refugee rights and self-reliance in Jordan, Turkey, Kenya, Somalia, and Uganda, among other countries. However, research indicates there are practical lessons learned from this compact model for how to better support refugee access to labor markets under decent conditions.

As an expert advisor trusted by national governments and well informed about the impact of national policies on economic growth, the WBG is in a unique position to dispel myths and misinformation that often pervade government officials' understanding of refugee situations. While the WBG's role is to support priorities identified by governments, it also has a critical role in ensuring they are accurately informed and aware of the myriad risks of attempting to exclude refugees from the labor market -- or failing to redress impediments to fair and equitable participation -- and conversely the potential benefits of facilitating refugees' fair and equitable labor market inclusion.

WBG Resources Can Support Sound Labor Market Access Programs

The WBG has internal resources that can assist other parts of the WBG in advising governments on the intersection of refugees, economic growth, and advancing inclusive development. Among others, the WBG's KNOMAD group has done extensive research into refugee labor market participation,⁷ and its FCV Group has deep expertise on refugee issues broadly, including their economic participation. The WBG's partnerships with UN agencies, such as its KNOMAD partnership with the ILO, can provide access to outside expertise and resources as well. These ongoing efforts illustrate the depth of knowledge and analytical capabilities the WBG has that can support existing and new efforts to safeguard refugees' equal access to decent work either through direct project implementation or partnerships.

Recommendations: Address Labor Market Access Barriers

To advance its mission of ending poverty, the WBG should prioritize refugees' access to decent work as a desired goal in all countries hosting significant numbers of refugees (e.g., 25,000 or more). Specifically, the WBG should:

Analysis

- ▶ **Examine barriers to refugees' labor market access when developing Country Plans and consider including projects that address those barriers.** Refugee communities should be consulted in developing projects to address those barriers; experience has shown that consultation is important for maximizing the success of such projects.

⁷ See Refugees' Right to Work and Access to Labor Markets, Note 2.

- ▶ **Ensure refugees' equitable economic inclusion is addressed in Project Plans, including their human rights and unique needs** related to identity documentation or legal status; migration and internal movement, both at and within national borders; market development or expansion; and justice or legal system improvements -- all of which affect refugees' fair and equitable access to national labor markets and thus contribute to lifting both refugees and others out of poverty. Consult with refugee communities as Project Plans are developed and implemented.

Coordination and Knowledge Sharing

- ▶ **Draw on the technical knowledge and resources of the FCV team, NGOs, unions and UN agencies**, frequently when engaging or preparing to engage with the government of a refugee-hosting state, particularly **at the following key moments**:
 - When preparing for negotiations on Country Plans or Project Plans;
 - When a Project Plan addresses an issue that impacts refugees' fair and equitable labor market participation -- for example, documentation, legal status, border control, permission to work, business permits, worker rights and protections, labor enforcement, legal or justice system reforms, or market development;
 - When evaluating the impact of a Country Plan or Project Plan.

Promote Workers Rights for Refugees

- ▶ **For all refugee labor market access schemes, promote the following safeguards to ensure inclusive development**:
 - **Implementation of the ILO's core labor standards**, as outlined in the ILO's Fundamental Principles and Rights at work. These core labor standards apply to all States regardless of ratification and all workers regardless of status. They are also well known, understood, and reported on by States.
 - **Implementation of worker rights legal aid** accessible to all workers, with a particular focus on refugees and other marginalized workers. A variety of well-vetted models exist: Workers' associations, NGOs and states around the world have experience in providing legal aid to workers. The ability of workers to privately enforce their rights is critical to preventing exploitation, preventing a decline in wages and working conditions, and ensuring fair and equitable labor market access for all.

Access to Housing, Land and Property in Forced Displacement Contexts

Considerations and Recommendations for the World Bank Group and Other Investors

Executive Summary

Access to housing, Land and Property (HLP) is foundational to socio-economic inclusion and an essential steppingstone for refugees and IDPs (“displaced persons”)⁸ to rebuild their lives. Access to HLP means having a home, free from the fear of forced eviction, a place that offers safety, and the ability to seek livelihood opportunities. Displacement creates specific barriers to accessing HLP, and host government policies and practices may further restrict access intentionally or unintentionally. It is equally important to ensure that HLP legal frameworks are fully implemented and protected when violated. This requires considering HLP issues among the host population alongside those of displaced persons.

Unresolved HLP issues are linked to recurring displacement, and may cause or worsen conflict, undermining stability and socio-economic development. The WBG and other investors have a role to play in strengthening host government response to displaced person’s HLP access challenges. Such an approach begins with a thorough understanding of the HLP legal frameworks and practices and how they relate to displaced persons. It also requires implementing concrete mechanisms to enable displaced persons’ access to HLP, undertaking policy dialogue with governments, and addressing HLP rights violations as part of development efforts.

More specifically, the WBG and other investors should:

Inclusive Policy

- ▶ Undertake systematic HLP due diligence and analysis when supporting displaced persons.
- ▶ Bolster national capacity to address HLP issues faced by displaced persons to facilitate their socio-economic integration.
- ▶ Support the right to restitution or reparation of displaced persons regardless the durable solution.

Promote Concrete Mechanisms to Ensure HLP Access

- ▶ Support government policies that enable displaced persons and other marginalized groups to access HLP.
- ▶ Strengthen government provision of remedial options for HLP rights violations and disputes.
- ▶ Support institutional safeguarding of property documentation including for displaced persons.
- ▶ Promote the documentation of displaced persons’ HLP assets in the area of origin/return.

⁸ Although different legal frameworks are applicable to refugees and IDPs, the types of barriers and challenges both groups face are similar. Therefore, the paper will refer to ‘displaced persons’ going forward.

Stakeholder Engagement

- ▶ Ensure that displaced persons in all their diversity have a voice in the design and implementation of projects strengthening their access to HLP.
- ▶ Engage strategically with all actors including NGOs and UN agencies involved in HLP issues at the global, regional and country level.

The Issue: HLP Access is Key to Sustainable Solutions for Displaced Persons

The Link between HLP Access and Socio-Economic Development

Access to HLP and improved security of tenure are crucial to the achievement of independent livelihoods. HLP access can also have a positive impact on household income and food security, as conveyed by the [WBG](#) and [Food and Agriculture Organization](#) (FAO). In many situations, the issue of access to natural resources, which is linked to HLP access, is also vital to establish livelihoods. This is not different in refugee or IDP contexts. Despite recognizing the role of HLP access for socio-economic development, assistance to displaced persons often does not consider underlying HLP issues.

Without proper due diligence on HLP assets can lead to competing claims, disputes and even violence. Complex legal frameworks and bureaucratic processes, additional legal requirements, and discriminatory practices can make it impossible for displaced persons to access their HLP rights. The lack of accessible remedies when HLP rights are challenged is another impediment to legal protection and security of tenure. Addressing these barriers requires strengthening governments' legal frameworks, more effective technical approaches and significant monetary resources.

The Link Between the HLP Access of Displaced People and the Host Population

HLP access for displaced persons is intrinsically linked to HLP access of the host population. It might be that the host population in general, or historically marginalized groups within the host population, face insecure tenure themselves or cannot access HLP rights. Moreover, problems with access to and control over HLP assets can be both a root cause and consequence of conflict and displacement. This might trigger new or exacerbate existing disputes and violence over HLP or cause further dispossession or displacement. However, if addressed in a clear, thoughtful, and systematic way, promoting HLP access for displaced persons as part of a broader approach can improve trust between displaced persons and host populations, in governance institutions, and lead to sustainable solutions to displacement. Combined with effective dispute resolution, HLP rights can even be a [tool](#) for building peace and preventing violence. In this sense, HLP could be considered an aspect of a “peace dividend” and the support the humanitarian-development-peace nexus.

The Link Between HLP and Return

HLP rights play a crucial enabling role in sustainable and voluntary return of displaced people, particularly the right to restitution or reparation. Displaced persons who know they can recover their HLP assets back home or be compensated for their loss are much [more likely to return](#). This link between HLP rights and facilitating voluntary returns or other solutions is not always considered. Facilitating the recovery of or compensation for abandoned or destroyed HLP assets is in most situations a complex task and will require high-level discussions, negotiations and formal (peace) agreements with the host governments and countries of origin. However, basic measures can be taken to prepare for and facilitate the possibility of future restitution of HLP assets while displaced. The WBG is in a unique position to encourage both high-level negotiations

between governments and national-level policies and practices to facilitate the restitution of HLP assets and the rights of displaced persons should conditions for sustainable and voluntary return be met. The WBG and other investors, however, should avoid being instrumentalized in any political pressures for the involuntary return of displaced people to unsafe and unsustainable conditions.

Considerations: Explore How HLP Access Affects the Socio-Economic Status of Displaced Persons and How They Are Intrinsically Linked to Solutions

Analysis of Legal, Policy, and Non-Legal Barriers to HLP Access at the Country Level

The WBG recognizes the importance of HLP rights to further economic opportunities for refugees in the Refugee Policy Review Framework (RPRF). However, a more **in-depth analysis of the legal and policy frameworks** and existing practices governing HLP access is essential, particularly at the country level. HLP rights for displaced persons are complex (often defined by statutory and customary/traditional frameworks) and multi-dimensional (technical, legal, and socio-political), involving a diverse set of stakeholders and asymmetries of power. The analysis should also shed light on the **socio-political aspects** of HLP access and other non-legal barriers displaced persons face in claiming HLP rights. For instance, displaced persons might be legally able to rent housing or cultivate land, but social stigma or discrimination may prevent them from accessing their rights and/or means for remediation.

The WBG's legal and socio-political analysis should examine questions or issues such as:

- ▶ What are the legal frameworks governing HLP rights and how do they relate to displaced persons? What additional HLP policies or reforms might be required to enable displaced persons to access HLP and improve their security of tenure?
- ▶ What is HLP policy framework for the host population? And are there any historically marginalized groups within the broader society that face similar barriers to accessing their HLP rights? Improving displaced persons' security of tenure implies ensuring the HLP rights of the host population as part of the process in case they face barriers themselves in accessing those rights.
- ▶ How is the current implementation of HLP and related policy frameworks? Are there any additional requirements or regulations that affect the access or enjoyment of HLP rights? What non-legal barriers or socio-political barriers do displaced people face when claiming their HLP rights?
- ▶ Has the required due diligence been done when HLP assets or infrastructure are made available or provided to displaced persons by host governments?
- ▶ How are laws or regulations enforced if at all? Who are the key interlocutors or powerholders when it comes to the administration of HLP policies?
- ▶ Are displaced people able to access natural resources? While the RPRF references natural resource management from the perspective of environmental degradation, it is equally important to consider its linkages to livelihood opportunities.

- ▶ Are there any existing HLP disputes or tensions among the host population and how have they been affected by the displacement? What are the available remedial options or mechanisms?
- ▶ How can HLP policies and their implementation be inclusive to refugees and host populations that face additional barriers based on age, gender, disability and diversity?

Concrete Mechanisms for Displaced People to Assert and Enjoy HLP Rights

Concrete mechanisms are equally important for displaced persons to access HLP as part of their socio-economic integration in host communities. The WBG is already addressing HLP access for refugee populations by strengthening government provision of land tenure security. For example, the WBG's [Municipal Infrastructure Development Program in Uganda](#) recognizes that access to land needs be addressed for both host and refugee populations, but there is no clear indication of how this issue is being addressed, what analysis was conducted, or what redress mechanisms will be available to resolve disputes. The WBG's support of such government mechanisms must be informed by the following elements:

- ▶ What might be needed to materialize *de jure* HLP rights into a *de facto* access to and protection of HLP for displaced persons? This starts with a contextualized analysis of forcibly displaced populations and the barriers that hinder their access to HLP rights.
- ▶ How will displaced people and other relevant persons be made aware of their (newly) acquired rights and potential legal obligations? Are authorities aware of their (new) policies?
- ▶ How are governments ensuring *secure* access to HLP assets for displaced persons? For example, knowing that access to land or housing will not be challenged encourages investment in seeds and tools, home improvements and proactive search for livelihood opportunities, which facilitates the local socio-economic integration of displaced persons. What are the legal or other protections needed to ensure increased security of tenure?
- ▶ What are the remedial options or mechanisms available to displaced persons to resolve HLP disputes or address HLP policy violations? And if such mechanisms are lacking, what is needed to address HLP disputes or policy violations involving displaced persons?

Upholding the Right to Restitution or Reparation

While the RPRF does not touch upon the question of **refugees' and IDPs' rights to recover their HLP assets** back home, the WBG should consider its role in upholding the right to restitution or reparation even when the recovery of HLP assets might be a longer-term process. For example, the WBG's [Puttalam Housing Project in Sri Lanka](#) facilitates access to land titles for the internally displaced, but there is no indication whether the project includes aspects of restitution or reparation for assets in their area of origin. As a respected agency focusing on longer-term sustainable development, the WBG is uniquely placed to encourage both hosting countries and countries of origin to consider the following aspects of restitution or reparation:

- ▶ What are the legal frameworks for displaced persons to reclaim abandoned or destroyed HLP assets through restitution or forms of reparation or compensation?

- ▶ Have HLP policies, including the rights to restitution or compensation, been discussed as part of development plans/projects or peace agreements?
- ▶ What is the HLP situation in the area/country of origin? To what extent do HLP issues constitute barriers to sustainable return and, if so, what could be done to address these? Have HLP issues been the root causes to conflict and displacement?
- ▶ What are the possibilities for displaced persons to transfer HLP assets from the location of displacement to their former or new home?

It must be stressed that restitution, reparation, or any other forms of compensation should never be used to encourage return when conditions are unsafe to do so. Premature, uninformed, and involuntary return to dangerous contexts violates international law and could lead to further displacement, conflict, and instability. HLP restitution or reparation should also be upheld in the case of local integration or relocation, taking the form of compensation or the provision of adequate housing.

Recommendations: Safeguard HLP Rights and Address HLP Rights Violations

Addressing unequal access to HLP for displaced persons and other marginalized groups are crucial to realizing their socio-economic integration and ultimately promoting shared prosperity and ending poverty. The WBG should consider HLP rights as central to development efforts in refugee and IDP hosting countries. Specifically, the WBG should:

Inclusive Policy

- ▶ **Undertake systematic HLP due diligence and analysis when supporting displaced persons.** Mapping HLP data collection and analysis is crucial to establish an in-depth understanding of the HLP situation in both its legal and socio-political aspects. Additionally, it is important to understand the relevance of customary frameworks and their relation to statutory frameworks and state institutions. This analysis should indicate how these frameworks relate to displaced persons and highlight other marginalized groups among the host population. Consultation with affected populations to identify legal and practical barriers to accessing their HLP rights is critical in this analysis.
- ▶ **Bolster national capacity to address HLP issues faced by displaced persons to facilitate their socio-economic integration.** The WBG should play a role in strengthening institutional capacity to address HLP issues, including those faced by the host population. This should also involve identifying and supporting institutions that administer HLP access and ensuring that they include displaced persons in their frameworks and mechanisms.
 - Considering that political will, responsibility, and capacity are not homogeneous nor always clearly allocated across entities, the WBG should map the overlapping jurisdiction/control over HLP issues among these entities.
 - Where authorities and entities are unwilling to collaborate or are party to the conflict, capacity building might focus on host population and displaced persons and interaction with respective authorities might be limited to local-level engagement and advocacy.

- ▶ **Support the right to restitution or reparation of displaced persons regardless the durable solution.** Whether displaced people choose to locally integrate or relocate, the WBG should support their right to restitution when able to, which could take the form of compensation or the provision of adequate housing.

Promote Concrete Mechanisms to Ensure HLP Access

- ▶ **Support government policies that enable displaced persons and other marginalized groups among the host population to understand, access and protect their HLP rights.**
- ▶ **Strengthen government provision of remedial options for HLP rights violations and disputes.** Identify and map institutions that have played a role in the adjudication of HLP disputes prior to displacement and find ways to integrate them. The existence of effective mechanisms for conflict resolution plays an important role in achieving sustainable solutions. It is also important to ensure that these mechanisms are accessible and non-discriminatory to women and other disadvantaged groups.
- ▶ **Support institutional safeguarding of property documents including for displaced persons.** This goes beyond formal titles and includes any documents that demonstrate a connection to the HLP assets/rights – as in the case of informal tenure – and should include an analysis of the gaps.
- ▶ **Promote the documentation of displaced persons' HLP assets in the area of origin/return.** This can include the mapping of damaged, destroyed, abandoned, or occupied HLP assets of the broader population and protection from further occupation, use or illicit sale. This will enable future restitution processes and prevent HLP disputes and secondary displacement. Providing information to displaced persons about their current HLP status and procedures for restitution is critical in facilitating sustainable displacement solutions. However, the WBG should avoid being instrumentalized in the politicized aspects that might lead to the involuntary return of those displaced.

Stakeholder Engagement

- ▶ **Ensure that displaced persons in all their diversity have a voice in the design and implementation of projects strengthening their access to HLP.** Consulting refugee and host communities is essential for maximizing the success of projects designed to address the barriers they face to accessing HLP rights.
 - The RPRF aptly acknowledges the need to pay particular attention to displaced women as they may encounter additional barriers and discrimination when it comes to accessing HLP rights. Despite strong constitutional guarantees of equality and non-discrimination, women often unable to assert their HLP rights in practice. It is therefore important to clarify women's HLP rights and their empirical complexities through participatory dialogues to address traditional, cultural, and other sensitivities and barriers at play.
 - The WBG should also engage other groups that face barriers to accessing HLP rights on the basis of age, gender, disability and diversity.
- ▶ **Engage strategically with all actors, including NGOs and UN agencies, involved in HLP at the global, regional and country level.**

- HLP issues straddle the humanitarian-development-peace nexus and so it is essential to facilitate robust coordination and ensure complementary action among diverse actors (development and humanitarian actors, academics, public and private sector, and other disciplines).
- Engage with the HLP Area of Responsibility (AoR) within the Protection Cluster of the humanitarian cluster system. Globally, the HLP AoR includes a diverse range of stakeholders including development, human rights, and humanitarian actors, donors, academics, etc. Country-level HLP coordination groups exist across the globe.

Legal Identity in Forced Displacement Contexts

Considerations and Recommendations for the World Bank Group and Other Investors

Executive Summary

Legal identity is essential to enjoying rights and enabling access to basic services and opportunities, like access to justice, physical integrity, freedom of movement and access to education, health or livelihoods. The lack of legal identity is often a cause and effect of displacement and statelessness. Refugees, internally displaced people (IDPs), and asylum seekers face particular barriers to accessing registration and identification processes that make legal identity a tangible entitlement. These barriers may be structural and affect these groups disproportionately because of their specific vulnerabilities or may be linked to states' policies and practices intended to exclude displaced persons. In forced displacement contexts, lacking a legal identity has immediate and wide-ranging negative effects on affected populations since access to humanitarian assistance and livelihood options to rebuild their lives is often dependent on these documents to prove identity.

While the concept of legal identity is not clearly defined in international law, it is a more frequently used term in the humanitarian and development sectors. Some refer to it as the right to have rights or the recognition of a person's existence before the law. Others see it as a process that starts with birth registration and continues through interaction with state institutions in registering vital events, obtaining identification documents and passports, etc. Despite the lack of an agreed definition, legal identity and other associated terms like identity, civil documents and civil registration, they are frequently referred to in humanitarian and development policy and commitments, including in the 2030 Agenda SDG goal to provide legal identity for all.⁹

The WBG should prioritize access to legal identity as a desired goal in all countries hosting significant numbers of displaced people to support inclusive development outcomes. Specifically, the WBG should:

- ▶ Ensure the needs of refugees, asylum-seekers and other displaced persons are included in projects strengthening national identification or civil registration systems.
- ▶ Promote inclusive policies and practices so forcibly displaced populations that face barriers to obtaining legal identity documents do not end up deprived of access to basic rights, services, and livelihood opportunities.
- ▶ Develop a global analysis framework to identify forced displacement related barriers to accessing legal identity.
- ▶ Create a global knowledge hub to ensure good practice is shared and systematized.
- ▶ Create a multi-disciplinary community of practice involving relevant stakeholders at global, regional and country level.

⁹ SDG 16.9 or the New York Declaration (para. 70-71).

The Issue: Barriers to Access Legal Identity

Gaps in Reliable Data

Reliable statistics are needed to understand how many displaced persons lack access to a legal identity and to design effective interventions that support legal identity for all. There is a dearth of reliable statistics on how many displaced persons lack access to a legal identity. According to data from the WBG, [one billion](#) people lack official proof of identity out of which 494 million live in sub-Saharan Africa, and 63 million in the Middle East and North Africa (MENA) region. Of the [80 million](#) displaced worldwide by mid-2020, [27 million were living in sub-Saharan Africa and almost 19 million in the MENA region](#). These numbers indicate a correlation between regions with large numbers of displaced persons matching those with the lowest numbers of people having a legal identity. Given the patterns of exclusion and obstacles that displaced persons face, it is possible they are among the group of people without legal identity in these regions.

Despite the lack of statistics, states, humanitarian agencies and development institutions like the WBG have acknowledged through policies and [initiatives](#) the importance of providing [refugees](#) and [IDPs](#) access to a legal identity. However, there is a gap between policy and practice which can be filled with high-quality data to inform effective and efficient policies and programming that promote access to legal identity.

Barriers Specific to Displacement

The [Norwegian Refugee Council's](#) (NRC) research from 14 countries including refugee and IDP settings show a pattern of exclusion through a diverse mix of legal, bureaucratic, and practical obstacles. These include unaffordable costs, lack of information about procedures, and discrimination based in law or social practices. Displaced persons are frequently asked to produce identity documents to obtain other documents or to register their children. Often, they cannot produce such documents because they lost them – or they never had them – and they end up in a vicious circle of being undocumented and lacking registration. These barriers are not unique to displacement contexts, but the specific vulnerabilities of displaced persons make them even more consequential.

There are, however, two barriers specific to displacement contexts. First, documents can often only be obtained in the place of origin and displaced persons cannot make the journey because of security concerns, lack of resources or fear of jeopardizing their legal stay in a host country. Second, the destruction of identity and civil registration offices and records as a result of conflict or disaster means that foundational documents are missing.

The consequences of not having access to a legal identity prevents access to rights and o basic services like education, health, employment, or social protection programs, which are fundamental to inclusive development. For example, refugee children are often [excluded](#) from accessing education because of missing identity-related documentation required for school enrollment or examination eligibility. In crisis situations, not being able to provide a document may result in being denied humanitarian assistance. Displaced persons who cannot produce the required documents may end up excluded from reconstruction efforts and from institutional support aiming at finding solutions to displacement. New and existing efforts, including from the WBG, should be amplified to ensure displaced persons have access to a legal identity, but this should not become a pre-condition to access rights and services. The right to education, health, or social protection – let alone access to humanitarian assistance – should not be dependent on producing documents.

Legal Identity in IDA18 Regional Sub-Window (RSW) Projects

Some IDA18 RSW projects acknowledge the interdependency between legal identity and access to rights and services in forced displacement contexts. In [Cameroon](#), identification and civil registration is integrated with health and nutrition assistance, which is an effective way of ensuring inclusion in national systems and will facilitate solutions to displacement at a later stage. In [Ethiopia](#), the WBG promotes the implementation of the Refugee Proclamation of the Government by connecting employment and livelihood opportunities with access to documentation. These are isolated yet valuable experiences that should be documented and further integrated in other IDA19 projects and in larger WBG initiatives focusing on legal identity, e.g., Identification for Development (ID4D).

Considerations: Displacement-tailored Analysis to Ensure Inclusive Identification and Civil Registration Systems

Leave No One Behind: Legal Identity for Displaced People

Trusted and inclusive identification and civil registration systems are part of WBG strategies to fight poverty and promote empowerment and positive change in several areas like gender equality or health. For the WBG, these systems are increasingly critical for realizing the SDGs and respecting the principle of *leave no one behind*. To that effect, the Bank [has mobilized significant investment \(i.e. \\$1 billion\)](#) on civil registration and ID-related projects in recent years.

Achieving the SDG goals of “*leave no one behind*” and “*legal identity for all*” (SDG 16.9) will require that the specific barriers faced by displaced persons are included in the global and country analysis that the WBG and other institutions undertake to understand gaps in ID and registration coverage. For example, the recent report of the ID4D Initiative “[Global ID Coverage, Barriers and Use by the Numbers: Insights from the ID4D -Findex Survey](#)” presents comprehensive data about the Global ID gap analyzed from a socio-economic perspective. Costs, demand and supply, literacy, etc. are indeed barriers commonly affecting displaced persons. The goal of the ID4D is for all people to be able to access services and exercise their rights, enabled by digital identification. Yet, few of the survey questions seemed to be tailored to address the specific barriers faced by displaced populations and therefore they do not appear in the findings. Unless the displacement perspective is factored in, digital solutions may not work for all.

Towards a Holistic Analysis of Legal Identity for the Displaced

A “forced displacement” inclusive analysis involves looking into discriminatory policies or legislation. The Refugee Policy Review Framework (RPRF) is addressing this in its section on refugee access to civil registration and identification. Yet, obtaining a holistic understanding of the barriers faced by displaced persons also requires analyzing the social and practical barriers. The RPRF should dig deeper into procedural requirements forcing displaced persons to return to the place of origin and whether it is impossible to obtain documents because registries are destroyed. NRC’s [research](#) shows that these issues are recurrent in forced displacement contexts, but country-level analysis requires context-specific considerations. For example, social norms discriminating against women may vary from context to context, thus requiring a different approach to overcome gender discrimination. The WBG should build alliances with national and international civil society to both undertake research and design projects that truly respond to displaced people’s needs.

The WBG is still not systematically undertaking this kind of holistic analysis when supporting ID and civil registration solutions in refugee-producing and receiving countries. In Mexico, for example, the WBG is financing a universal ID project, Cédula Única

de Identidad Digital (CUID, by its acronym in Spanish). However, the WBG had not considered the legal identity needs of refugees until NGOs raised the need to include them; to date, it remains unclear whether refugees will be included.

Lastly, the RPRF focuses on policies related to refugees only, while the WBG – including IDA18 – is implementing projects addressing legal identity issues in internal displacement contexts (e.g., Cameroon). A unique and coherent framework for researching and considering specific barriers in all displacement contexts is required to design effective interventions and strengthen government identification systems.¹⁰

Inclusive ID and Civil Registration Systems

The [Principles on Identification for Sustainable Development: Toward the Digital Age](#), endorsed by the WBG, call for inclusive systems (universal and non-discriminatory) and for the reduction of costs and IT disparities. Any system – digital or not – should aim at fulfilling these principles. If displaced persons are not to be left behind, the specific barriers they face need to be analyzed and addressed.

There is broad agreement that trusted and inclusive ID and civil registration systems are key to achieving the SDGs and leaving no one behind, as well as the WBG’s twin goals of ending extreme poverty and promoting shared prosperity. While having a legal identity is a right in and of itself, it is also a gateway for people to fully participate in their society and economy. In Iraq, while identity documentation is not officially required by national laws, in practice medical officials often require it to conduct serious procedures ([NRC 2019](#)). In Myanmar, a birth certificate is required for primary school enrolment” ([NRC 2018](#)).

Freedom of movement and access to education, health, and humanitarian assistance should not be conditional on having identity or civil documents. The WBG and other actors supporting ID and registration systems should also promote inclusive policies and practices so populations that cannot access documents do not end up deprived of access to basic rights and services. This can be achieved using interim identification methods, “time limited amnesties,” to produce documents needed to access services, and other flexible and creative means.

Recommendations: Address Barriers to Legal Identity

To advance its mission of ending poverty and not leaving anyone behind, the WBG should:

Evidence Generation and Analysis for Access to Rights and Services

- ▶ **Ensure the needs of refugees, asylum-seekers and other displaced persons are included in projects strengthening identification or civil registration.** Every project should be based on contextualized analysis of forced displacement-related barriers and should include actions to address them in host government plans. Moreover, projects addressing socio-economic needs of displaced persons should include a legal identity component.
- ▶ **Develop a global analysis framework to identify forced displacement related barriers to access legal identity.** The framework should integrate specificities on internal displacement and refugee contexts. WBG initiatives, such

¹⁰See [here](#), which discusses how the Cédula Úniversa de Identidad Digital will be issued to “vulnerable populations” but does not mention refugees or other non-nationals; see [here](#), which implies the Cédula Úniversa de Identidad Digital will simply be a new, enhanced version of identity documents issued under the existing Clave Única de Registro de Población (CURP) system, which is currently available to refugees.

as the ID4D and the RPRF, should be coordinated closely to ensure a coherent research framework across different contexts that will help identify global patterns of exclusion. International and national NGOs and civil society should be meaningfully engaged in the development of the framework to ensure positive outcomes.

- ▶ **Invest in reliable global statistics about displaced persons lacking a legal identity** to understand the scope and magnitude of the problem and to design effective interventions WBG is best placed to leverage its strong analytical capabilities to fill this much needed information gap. This could be integrated into the ID4D survey initiative or as an area of study for the WBG-UNHCR Joint Data Center on Forced Displacement.

Project Implementation

- ▶ **Ensure all WBG projects respect the Principles on Identification for Sustainable Development** and other relevant standards in forced displacement settings. These Principles are critical for promoting universal access to legal identity, as well as advancing economic and social development and ensuring no one is left behind.
- ▶ **Do not require beneficiaries to produce documentation as a prerequisite** to access rights and services such as education, health, employment, and humanitarian assistance. The WBG should promote inclusive policies and practices when engaging with governments so forcibly displaced populations that face barriers to obtaining legal identity documents do not end up deprived of access to basic rights, services, and livelihood opportunities.

Stakeholder Engagement and Knowledge Sharing

- ▶ **Ensure the participation of displaced persons in the design and implementation of projects strengthening states' identification or civil registration systems.** Consulting displaced persons is essential to addressing their identification-related needs and for designing efficient, effective and accountable interventions.
- ▶ **Create a multi-disciplinary community of practice involving relevant stakeholders at global, regional and country level.** Currently no legal identity forum exists for actors to share knowledge and experience, coordinate efforts, or strategize collectively. As the largest funder for legal identity efforts globally, the WBG should consider establishing a community of practice that includes a range of partners from the humanitarian, development, human rights, academic, and other disciplines. Establishing a forum that draws from the full range of partners and resources could unlock creative outcome-oriented strategies to advance legal identity solutions for the forcibly displaced.

The community of practice could house a global knowledge hub to ensure good practice is systematized and to spur a cycle of learning so that positive experience is brought to scale. Lessons learned from IDA18 projects and other WBG initiatives addressing legal identity issues in displacement contexts should be systematized and made publicly available. Relevant actors like UN agencies, international and national NGOs and civil society should be invited to contribute with research and analysis to build a comprehensive picture on good practice.

Applying an Age, Gender, Disability and Diversity Lens in Forced Displacement Contexts

Considerations and Recommendations for the World Bank Group and Other Investors

Executive Summary

Developing sustainable solutions to forced displacement requires the meaningful participation of everyone impacted, particularly those most affected by forced displacement themselves: refugees and IDPs in all their diversity.

Beyond the moral imperative, inclusion and non-discrimination are rooted in international humanitarian law and human rights law.¹¹ Respecting the rights of all refugees and IDPs therefore should be central to all projects financed by the WBG and other investors.

Evidence¹² has shown that exclusion – based on age, gender, including sexual orientation and gender identity, disability, and other characteristics such as ethnicity, religion, economic status, displacement status, or statelessness – is not only unjust, it also increases poverty and impedes economic growth. Therefore, taking a non-discriminatory and inclusive approach is vital to achieving the WBG’s twin goals of ending extreme poverty and boosting shared prosperity.

This paper highlights some of the WBG’s existing guidance and best practices on age, gender, disability, and diversity as well as resources specifically tailored to displacement settings. The paper is not intended to be an exhaustive resource, but rather an overview on potential ways to overcome silos in inclusion work and make responses more effective.

To amplify existing guidance and best practices, the WBG and other investors should:

- ▶ Require all its programs and funded initiatives and those of partners to include age, gender, disability and other diversity considerations.
- ▶ Meaningfully consult with diverse populations and their representative organizations.
- ▶ Collect, analyze, and utilize quality data that is disaggregated by age, gender, and disability at a minimum.
- ▶ Ensure internal knowledge sharing, expertise and sufficient resources for WBG’s staff advising on age, gender, disability, and other diversity factors to ensure a coherent approach.
- ▶ Utilize existing tools developed for displacement settings, such as UNHCR’s Age, Gender and Diversity (AGD) policy.

¹¹ For example, see non-discrimination principle in international humanitarian law (IHL), ICRC’s data base on customary IHL: https://ihl-databases.icrc.org/customary-ihl/eng/docs/vi_rule88 or for international human rights law (IHRL), see CEDAW Article 1 on discrimination against women, or CRPD Article 29 on the participation on persons with disabilities in public and political life.

¹² For example, see, Sebastian Buckup, ILO study “The price of exclusion: The economic consequences of excluding people with disabilities from the world of work” (2009) or Gaëlle Ferrant and Alexandre Kolev, OECD Study, The economic cost of gender-based discrimination in social institutions (2016).

The Issue: Centering Age, Gender, Disability, and Diversity is Vital to Sustainable Solutions

Mainstreaming Inclusion Across WBG Projects in Forced Displacement and FCV contexts

The WBG has a deep well of tools and resources on integrating an age, gender, disability, and diversity lens that should be better applied to and adapted for its forced displacement projects, including:

- ▶ The WBG’s [Disability Inclusion and Accountability Framework](#) and the [Gender Strategy](#) (2016-2023).
- ▶ A series of helpful good practice notes on participation and data collection as it relate to [gender](#); non-discrimination and [disability](#); and non-discrimination and [sexual orientation and gender identity](#), to make projects more inclusive.
- ▶ The WBG’s [Environmental and Social Framework](#) (ESF) and the Bank Directive on “[Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups](#)” espouse a due diligence approach for WBG projects to prevent discrimination or adverse impacts on marginalized groups who could face barriers in accessing development benefits. The Directive considers “age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources” of individuals and groups. While displaced persons are not included on this list, the ESF outlines critical opportunities for diverse stakeholders to feed into project design and push for more inclusive projects. With the ESF focusing more on borrowers’ responsibilities and the Directive more on WBG staff, it is important for both to translate into improved project design and implementation and ensure that disaggregated risks and project impacts are mitigated for displaced groups.
- ▶ The WBG has Global Advisors on Disability, Sexual Orientation and Gender Identity (SOGI), and a Global Director for Gender, who lead the implementation of the respective strategies in programs and partnerships. It is important for staff within the Bank to learn more about how to operationalize inclusion for greater impact in forced displacement settings.
- ▶ [Commitments](#) the WBG made at the Global Disability Summit in 2018, such as ensuring that all WBG-financed education programs and projects will be disability-inclusive by 2025.

The creation of these WBG initiatives and capacities has undoubtedly pushed the agenda further on disability, SOGI, and gender, yet these issues have not been consistently mainstreamed into the IDA18 RSW for Refugees and Host Communities projects.

A Broader Definition of Inclusion

Where inclusion has been considered in IDA18 RSW projects, the focus has been on one aspect of inclusion, such as children with disabilities or women’s empowerment. For example, in Lebanon, a WBG [project](#) on “health resilience”, targeting displaced Syrians in Lebanon and poor Lebanese, includes the percentage of female beneficiaries and children fully vaccinated as indicators of progress, but not how the project will benefit persons with disabilities. Without a specific reference to how persons with disabilities will benefit, specified targets to meet or data collection that needs to occur, persons with disabilities will most likely be left out.

In Bangladesh, a WBG [project](#) providing “health and gender support” implemented by the Ministry of Health and Welfare has a detailed stakeholder engagement [plan](#), which also recognizes the need for GBV analysis against members from the transgender community. However, the implementation status and results [report](#) only specifies women and girls and other children and doesn’t include information on responses to individuals with diverse sexual orientation, gender identity and expression, or sex characteristics.

Gender has also been a theme for the last two International Development Association (IDA) financing cycles, but tailoring projects that focus on one standalone group does not suffice. More systematic and explicit references to age, gender, disability, and other aspects of diversity could help ensure consideration of overlooked groups among refugees and IDPs, such as older people, indigenous groups, stateless persons, or persons with diverse sexual orientation, gender identity and expression, or sex characteristics. This is particularly relevant in displacement settings where community support systems and protection mechanisms break down or are overwhelmed.

An Intersectional Approach

In addition, WBG projects could better examine how different identities intersect with each other and result in overlapping and complex vulnerabilities. The WBG’s [Strategy for Fragility, Conflict, and Violence \(FCV\) 2020-2025](#) aptly recognizes that “intersectional approaches may be needed to address multiple forms of vulnerability.” Such an intersectional approach requires an understanding of how various aspects of a person’s social and political identities combine to result in unique modes of discrimination/privilege and enhance/reduce risk. Reducing these complex risks in forced displacement settings often requires a multi-sectoral response that address the root causes of systemic discrimination and inequality.

An intersectional approach is especially urgent when responding to the COVID-19 pandemic in refugee settings. Manifestations of stigma have also been well-documented in previous health emergencies, for example, harassment, exclusion, and abandonment of or violence against individuals or population groups believed to be “carriers” as well as social rejection of individuals believed to be infected or recovering from contagion. As already evident in the COVID-19 context, women as caregivers, indigenous people, LGBTIQ+ people, older persons, people with disabilities, migrants, refugees, IDPs and health workers are particularly being stigmatized.

Even when access to health care for migrants, refugees and IDPs is guaranteed by States, discriminatory restrictions of movement, stigmatization, and xenophobic attitudes and practices can serve as real barriers to health and other essential services, or people may fear reaching out to gain them. The WBG should ensure that any public health and economic responses to COVID-19 are age, gender, disability, and diversity inclusive, including when it comes to the distribution of a vaccine. These good practices should be applied to displacement settings, to prevent existing inequalities from being exacerbated.

Existing Helpful Tools for Displacement Settings

There are several tools to ensure inclusion in displacement settings, such as the [IASC Guidelines on Including Persons with Disabilities in Humanitarian Settings](#), [IASC Gender Handbook](#), the [Inter-Agency Minimum Standards for GBV](#) and the [Minimum Standards for Child Protection in Humanitarian Action](#).

The UN Refugee Agency (UNHCR) also adopted an [Age, Gender and Diversity Policy](#) (AGD), which applies to all UNHCR’s operations and with mandatory compliance. The policy offers guidance on operationalizing an AGD approach, including by

requiring all country operations to employ participatory methodologies at each stage of operations. The WBG and other investors should utilize these tools in displacement contexts to complement their own existing efforts and enhance risk mitigation strategies.

Considerations to Ensure an Inclusive Approach

The WBG initiatives, such as the Refugee Policy Review Framework (RPRF), present an opportunity to review whether national policies are also inclusive and tailored to diverse refugees and IDPs. Providing a robust analysis on power imbalances and structural barriers on how these affect diverse displaced populations is key when considering a new investment or reviewing a policy. The WBG and other investors should consider the following questions when pursuing an AGD approach:

- ▶ Does the project or policy acknowledge and address the different needs and capacities of girls, boys, women, men, including persons with diverse SOGI and people with disabilities, in all their diversity?
- ▶ How does the project or policy ensure that refugees and IDPs in all their diversity can benefit and will not be harmed, e.g., is information accessible to refugees and IDPs with hearing or vision disabilities or does it reach adolescent girls?
- ▶ How does the project or policy contribute to the promotion of safety and dignity, enjoyment of human rights, and the provision of accessible and quality services, including mental health and sexual and reproductive health care for everyone?
- ▶ Were diverse local communities and civil society, including refugee- and IDP-led organizations, disability and LGBTIQ+ advocates meaningfully consulted, and their feedback incorporated, as well as under-represented groups such as adolescents, youth and older persons, through the lifecycle of the project? How will the successful inclusion of diverse populations be assessed?

If marginalized groups are overlooked and excluded, investments will not contribute to long-term solutions. Approaches that are not intersectional and do not consider the full context are likely to leave refugees and IDPs furthest behind. For instance, incentives to eliminate barriers in the labor market for refugees will not benefit refugees who belong to ethnic minorities if national laws discriminate against them. Remote programs might not be accessible to adolescent girls because they do not have access to the Internet. Individuals with diverse SOGI might not access health care because of harassment and homophobic attitudes. Schools that are not accessible to children with diverse disabilities will hinder them from pursuing an education.

The WBG and other investors play a critical leadership role in forced displacement contexts and can directly influence national systems and programs to be more inclusive, reflective of best practices and representative of the populations being served. Taking an age, gender, disability, and diversity sensitive approach when addressing forced displacement will lead to more effective interventions and prevent the WBG and other investors from reinforcing discriminative systems and negative attitudes that lead to greater marginalization of displaced populations.

Recommendations: Leave No One Behind

Building on existing guidance and good practices, the WBG and other investors should:

Policy and Funding

- ▶ **Require all projects and initiatives to include age, gender, disability, and other diversity considerations** in analysis, design, implementation, monitoring, and assessments, and evaluation.
- ▶ **Support host countries to ensure their national policies espouse an intersectional approach** that is age, gender, disability, and diversity-sensitive and include refugees and IDPs in all their diversity. Reducing these complex risks in forced displacement settings often requires a multi-sectoral response that addresses the root causes of systemic discrimination and inequality.
- ▶ While the **RPRF** considers the gender dimension of policies, considerations related to age and disability should be integrated as well.

Stakeholder Engagement

- ▶ **Meaningfully consult with diverse populations and their representative organizations, respecting their leadership and expertise**, to help understand the challenges diverse communities face, what is needed to overcome those challenges, and ensure that solutions are designed and implemented inclusively.

Evidence Generation and Knowledge Sharing

- ▶ **Collect, analyze, and utilize quality data that is disaggregated by age, gender, and disability at a minimum**, to help understand different protection needs, both at country level and globally.
- ▶ **Ensure internal knowledge sharing, expertise and sufficient resources for WBG's staff advising on age, gender, disability, and other diversity factors to ensure a coherent approach is applied to forced displacement contexts.** The WBG should also consider making existing frameworks mandatory, such as the Disability Inclusion and Accountability Framework, which is currently non-binding and would be a valuable resource for adaptation for and application in forced displacement contexts.
- ▶ **Utilize existing tools for displacement settings such as UNHCR's AGD policy to complement WBG's internal guidance** to help operationalize an AGD approach unique to displacement contexts.