Moving Beyond the Emergency: A Whole of Society Approach to the Refugee Response in Bangladesh

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Bangladesh provides a significant global public good by hosting over one million Rohingya refugees. Most are living in camps in Cox’s Bazar district, where resources and livelihoods are strained. The refugee situation is likely to be protracted, and medium-term planning is critical. CGD has been working with local and international partners to understand what that medium-term response could look like. This is one of five publications where we outline steps for developing a medium-term plan for Bangladesh, to benefit refugees and their host community alike. The other four cover forest and landscape restoration, trade, private sector investment, and labor mobility.

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EXECUTIVE SUMMARY

In August 2017, more than 740,000 stateless Rohingya started to flee systematic violence and persecution perpetrated by Myanmar’s military, the Tatmadaw, and other security forces in Rakhine State. The government of Bangladesh generously opened its borders to these forcibly displaced Rohingya and is now hosting over one million refugees, the vast majority of whom are confined to camps in one of the country’s poorest districts, Cox’s Bazar. Two years on from what quickly became the world’s fastest growing refugee crisis, all signs point to an acute need to change the approach to the Rohingya refugee response.

The current response is based on an understandable, but ultimately insufficient, short-term view that focuses on delivering basic and lifesaving humanitarian assistance. But the needs of the Rohingya refugees and local hosting community are far more complex. The government of Bangladesh rightly
wants Myanmar to be held accountable for resolving the root cause of the crisis, but the reality is safe and voluntary returns of the Rohingya to Myanmar are unlikely in the near term. There have been several attempts at repatriation since the start of the crisis, most recently in August 2019; but none has been successful as refugees refuse to return until their citizenship, safety, freedom of movement, and access to services and livelihoods in Rakhine are guaranteed. For the sake of both Rohingya and Bangladeshi residents of Cox’s Bazar, the government of Bangladesh must prepare for the fact that this refugee crisis is on track to becoming protracted. Even if Myanmar successfully addressed the underlying causes of inequality and marginalization across Rakhine State, and refugee returns became a reality, credible estimates show that in a realistic scenario for repatriation, significant numbers of Rohingyas will remain in Bangladesh for more than 10 years.¹

The inadequacy of the current response has implications for the refugees, host communities, and Bangladesh’s development trajectory. The well-being of refugees and host communities is at risk and social cohesion is deteriorating. Nearly 44 percent of Rohingya refugees and 40 percent of the host community have poor or borderline food consumption, meaning they are unable to get enough to eat and are not getting the right nutrition—which could lead to malnutrition and other health issues. Poverty levels among refugees and host communities are high: 75 percent of refugees live below the minimum expenditure basket. Approximately 33 percent of the local population in Cox’s Bazar lives below the national poverty line, compared with the national average of 25 percent.² Negative coping strategies, including child labor, early marriage, and drug trafficking, are frequently reported in the camps. And while only 11 percent of Rohingyas indicated in a recent survey that there are inter-community tensions, 48 percent of locals said tensions exist.³ It is difficult to imagine how Bangladesh, and Cox’s Bazar in particular, will achieve the Sustainable Development Goals and its commitment to Leave No One Behind given this trajectory.

Unlike five to ten years ago, when a short-term response to refugee crises was the accepted norm, the international community now acknowledges the importance of development approaches in refugee settings. The Grand Bargain, Global Compact on Refugees, and World Bank have catalyzed a set of tools for humanitarian and development actors to better support both refugees and hosts in protracted situations. However, the government of Bangladesh’s policy environment is a barrier to fully realizing these approaches and the positive impact they can have. Since the start of the crisis, the government has restricted NGO access in the camps, and put in place measures that prohibit refugees from accessing the labor market and getting a formal, accredited education in schools. Some progress has been made, including allowing refugees to partake in cash-for-work and paid volunteer opportunities in the camps and approving two out of four levels of an informal learning framework for Rohingya children. However, this progress is a far cry from meeting needs and enabling self-reliance.

Inadequate financing to support the government of Bangladesh and implementing agencies is only contributing to the challenges. The 2019 Joint Response Plan (JRP) was funded at just 34 percent as of July 2019. The 2018 JRP was only 69 percent funded, leaving a shortfall of nearly US$300 million. In addition, humanitarian funding that is available is being disbursed in short-term grants—which is inefficient and unsustainable especially as donor fatigue sets in. While development financing from the World Bank and the Asian Development Bank will help meet the needs of refugees and host communities, the banks

have not successfully shifted the response to a multiyear plan to align with the multiyear financing they are bringing to the crisis. The World Bank has so far not been able to leverage its financing to encourage the government of Bangladesh to make necessary reforms to its refugee policies to support self-reliance as it has done in other contexts, such as Jordan and Ethiopia. Consequently, bank financing is being used as gap-filling for humanitarian aid rather than as catalytic development financing.

Global experience has demonstrated that developing a plan to address medium-term needs for refugees and for hosts—or a whole of society approach—is critical and that this plan should be put in place within the first few years of a crisis. Some of the benefits of a whole of society, medium-term plan that enables self-reliance have been demonstrated in countries such as Uganda, Jordan, and Colombia, where refugees have legal pathways to formal education and decent work. At the same time, the risks of failing to devise and implement such a plan have been made clear through protracted refugee situations such as in Thailand, where refugees do not have livelihoods opportunities, leading to high levels of economic stress and negative coping strategies such as early marriage, alarming levels of suicide, and violence—impacting the well-being of both refugees and host communities alike.

The inevitable protracted nature of this refugee crisis, combined with the increasingly pressing challenges faced by Rohingya and their hosts, demands a change in course. Donors and implementing partners are starting to think about what a medium-term approach could look like. National and international actors should prioritize three pillars of actions:

1. The government of Bangladesh, with development and humanitarian actors, should develop a three- to-five-year Whole of Society Medium-Term Response Plan that addresses the well-being of, and enables self-reliance among, Rohingya refugees and the Bangladeshi host community in Cox’s Bazar. The plan must define a set of shared outcomes to be achieved, outline complementary actions, and identify incremental steps to expand refugees’ protections and access to services and the labor market.

2. The government of Bangladesh, with development and humanitarian actors, should create a Coordination Platform that is responsible for designing the plan, coordinating its implementation, and monitoring progress towards agreed outcomes.

3. The international community—particularly donors, UN agencies and the private sector—should provide adequate and appropriate support for the implementation of the plan, including multiyear financing, economic incentives for private investment, and other “beyond aid” measures to support economic growth.

I. INTRODUCTION

In August 2017, more than 740,000 stateless Rohingya started to flee a dramatically escalated campaign of systematic violence and persecution perpetrated by Myanmar’s military, the Tatmadaw, and other security forces in Rakhine State. As in the 1970s and 1990s when the Rohingya were forcibly displaced from Myanmar, the government of Bangladesh once again generously opened its borders. Bangladesh now hosts over one million refugees, who reside in one of the country’s poorest districts, Cox’s Bazar. At the two-year mark of what quickly became the world’s fastest growing refugee crisis, all signs point to an acute need


5 While Bangladesh is not a signatory to the 1951 Refugee Convention, and does not recognize these new arrivals as refugees, Rohingya who have fled across borders unequivocally meet the refugee definition and are recognized as refugees by UNHCR
to change the approach to the Rohingya refugee response. Basic and lifesaving humanitarian assistance alone is no longer sufficient to address the increasingly complex challenges facing Rohingya refugees and the local hosting community. The current response is at a critical juncture and now is the time to transition from a basic emergency response to a comprehensive whole of society approach over the medium-term that deliberately and strategically benefits both the local population and Rohingya refugees.

The importance of a shift in approach is illustrated by the barriers to achieving durable solutions—which are a distant hope for Rohingya refugees in Cox’s Bazar. Repatriation is the priority of the government of Bangladesh, the international community, and Rohingya themselves; however, conditions in Myanmar show no signs of becoming safe for voluntary and sustainable return anytime soon. Resettlement of Rohingya refugees from Bangladesh has not been permitted by the government since 2010, and the government recently turned down an offer from Canada to resettle some Rohingya refugees. The government has taken this position because it believes resettlement could become a pull factor for more refugees to cross the border. Even if the government permits third-country resettlement, it will only be a solution for small fraction of the population, with just 92,400 refugees from around the world resettled in 2018. In addition, the government of Bangladesh’s policies do not permit local integration, confining refugees to camps in Cox’s Bazar, largely separate from the local population.

Refugees and host communities face a range of complex barriers to accessing quality services and pursuing livelihoods in Cox’s Bazar. Rohingya refugees remain almost entirely reliant on food aid while opportunities for self-reliance, such as accredited education and formal jobs, remain restricted. High levels of vulnerability, combined with lack of opportunity, have left some Rohingya refugees with no choice but to turn to harmful coping strategies like child marriage, child labor, and drug and human trafficking. For Rohingya children, the risk of a lost generation grows with each day that passes without access to quality education. At the same time, the local community is increasingly questioning how long they can continue to host the Rohingya population without commensurate support to meet their basic needs and mitigate the impacts of the influx, like environmental degradation.

Funding to support both refugees and hosts has failed to meet needs over the past two years, and aid is only likely to dwindle as donor fatigue sets in and as the international community shifts their focus to global emergencies elsewhere. Without a change in approach to the crisis, the situation in Cox’s Bazar will only get worse.

**Shifting the response trajectory: Objectives of a whole of society approach**

A whole of society approach to the Rohingya crisis should seek to achieve two interconnected core objectives over the next three to five years: improve outcomes for all communities affected by Rohingya displacement, and foster social cohesion between the Rohingya and local communities.

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7 Some Rohingya have been resettled; however, they have been resettled from other neighboring countries such as Malaysia.


Three conditions are critical to the success of this approach, and to improving outcomes for and enabling self-reliance among refugees and host communities in Bangladesh:

1. Willingness of all stakeholders to adopt a medium-term vision for the development of Cox’s Bazar district, and potentially surrounding areas like Chittagong, that reflects the views and needs of affected populations and align with Bangladesh’s broader development aims to achieve the Sustainable Development Goals (SDGs), including the commitment to leave no one behind.

2. Leadership by the government of Bangladesh, particularly in instituting policy reforms that will facilitate inclusive growth, such as reforms to improve access to livelihoods and to quality formal education for local populations and refugees.

3. Adequate support and investments from the international community, including robust coordination between humanitarian and development actors as well as robust and sustained multiyear financing aligned with the medium-term plan.

A whole of society approach over the medium term, and the eventual voluntary, safe, dignified, and sustainable return of Rohingya to Myanmar, should be understood as complementary, not mutually exclusive. Recognizing that voluntary, safe, dignified, and sustainable returns are the ultimate goal, including for Rohingya refugees themselves, investing in refugee self-reliance now is important to facilitating sustainable return in the future. Experience from other protracted refugee responses shows that generating an income can allow refugees to accumulate assets and savings, which, in turn, can support them to cover the costs of return and restart their lives back home, such as by being able to buy or rent land, build a home, or pay for a child’s schooling.

The reality is that conditions for voluntary, safe, dignified, and sustainable return do not exist now and will not be realized in the near future. Credible estimates show that in a realistic scenario for repatriation, significant numbers of Rohingyas will remain in Bangladesh for more than 10 years. Reflecting this reality and the finite nature of humanitarian financing for refugee emergencies, the government of Bangladesh, with the support and partnership of the international community, has an opportunity to approach the Rohingya response differently.

Bangladesh is well positioned to learn from other contexts and deliver a model that yields positive results for local communities, for refugees, and for the host country more broadly. The situation in Bangladesh is unique, including because Myanmar has denied the Rohingya citizenship, but it can still draw on and contribute to the growing body of global experience of sustainable approaches to refugee responses. In particular, Bangladesh can help build the evidence for a model that balances repatriation with socio-economic enhancement and that takes advantage of the contributions that refugees can make to their local host economy. Moreover, it can be a leader in helping to identify ways to drive social cohesion—a complex issue with few clear answers or indicators.

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This note outlines the state of the current Rohingya refugee response, how it has impacted the host community, why a whole of society approach is critical, and the major barriers to this approach. It concludes with concrete recommendations on how to move forward.

II. CURRENT STATE OF THE ROHINGYA REFUGEE POPULATION IN COX’S BAZAR

Since the escalation of the Rohingya response in 2017, basic service provision and refugees’ access to services within the camp in Cox’s Bazar have considerably improved. For example, there continues to be increased, albeit insufficient, access to water, sanitation, and hygiene (WASH) infrastructure, distribution of energy-efficient liquid petroleum gas (LPG) refills, and distribution of e-vouchers for food assistance. NGO-run safe spaces, women-friendly centers, and learning centers report increased attendance, although the overall numbers are still a fraction of the entire refugee population. By August 2019, 500,000 refugees had been registered through the comprehensive United Nations High Commissioner for Refugees (UNHCR)-government of Bangladesh registration and documentation process. For many refugees, particularly given their lack of citizenship and lack of access to civil documentation in Myanmar, this document is their only or primary personal identity document that provides access to services and protection against forced return.

Despite these improvements, significant gaps in service provision and high levels of vulnerability among Rohingya refugees persist, with some outcomes worsening for Rohingya over time. As of July 2019, more than 97,000 Rohingya children—including about 55,000 children ages 3-14 and another 42,000 children ages 15-24—were not enrolled in any learning opportunities, including at learning centers or in home-based programs. Eighty-eight percent of refugees remain highly vulnerable to food insecurity and depend on food aid to survive. Nearly 44 percent of refugees who arrived in 2017 have poor or borderline food consumption: they are unable to meet their food needs and are not getting the right nutrients through the food they consume, which could lead to malnutrition and other health issues. Among the Rohingya children aged one to five, 32 percent are chronically undernourished and 13 percent are acutely undernourished. The Rohingya are extremely economically vulnerable: 75 percent of refugees are living below the minimum expenditure basket—up 10 percentage points from 2017.

These poor outcomes, combined with a lack of self-reliance opportunities, leave many refugees with no other option but to turn to negative coping strategies. Buying food on credit, borrowing money to buy food, and selling or exchanging food assistance have all increased among Rohingya refugees in 2018 as compared to 2017. In 2018, nearly 45 percent of refugees sold or exchanged some of their food aid to meet basic needs, such as for more nutrient-rich foods like vegetables or eggs. Other coping strategies, including begging, early childhood marriage, participation in the drug trade, and even working as a day laborer in the informal economy where exploitation is common, carry tremendous protection risks.

Another concerning trend is the increase of violence or intimidation against Rohingya women traveling through the camps to access services, engage in cash-for-work activities, and support humanitarian agencies in volunteer positions. This trend began in October 2018 and escalated in January 2019 and can be at least in part attributed to cultural sensitivities around women accessing women-only spaces or volunteering with NGOs outside of the home—especially when self-reliance opportunities for men are highly limited. While first and foremost a protection concern, this intimidation has also reduced the numbers of Rohingya volunteers, impacting community outreach efforts to raise awareness about important services.

If the response continues on this trajectory, despite improvements to basic service provision, the risk is a continued decline in outcomes and increase in negative coping among the Rohingya and host community members. To change course, significant investments must be made in an approach that enhances refugee and host community self-reliance.

III. IMPACT OF THE REFUGEE INFUX AND RESPONSE ON THE LOCAL HOST COMMUNITY

Cox’s Bazar is one of Bangladesh’s poorest districts—and the two subdistricts hosting the refugees, Teknaf and Ukha, are among the poorest in Cox’s Bazar. In the district, approximately 33 percent of the local population lives below the poverty line, compared with the national average of 25 percent. Forty percent of the local population also falls into borderline or poor food consumption, and 41 percent borrow food or rely on help from a relative to support consumption needs—nearly the same percentage as refugees.

Cox’s Bazar is also one of the lowest performing districts on school attendance and educational outcomes in Bangladesh. It has a net intake rate for the first grade of primary school at 73 percent for boys and 69 percent for girls, as compared to the national average of 98 percent. The primary education dropout rate in the district is one of the highest in the country at 31.2 percent, compared to the 19.2 percent national average. Cox’s Bazar ranked second to last in reading and math attainment, reflecting a poor quality of education and teaching practices, low attendance rates, and low levels of

24 Ibid.
25 Ibid.
26 Observations by NGOs, including by the IRC.
spending on public education in the district.\textsuperscript{32} While higher quality private education is available, it is often too expensive for families to send their children.

Cox’s Bazar is not new to hosting Rohingya refugees, but the rapid and sizable influx—refugees now outnumber locals nearly three to one in Ukhia and Teknaf\textsuperscript{33}—and the subsequent humanitarian response have deeply impacted the host community. Rapid deforestation to make way for the refugee camps, firewood collection for fuel, and insufficient water and sanitation management systems have not only led to environmental degradation—a major issue for a country already victim to climate change—but also impacted livelihoods opportunities for locals, particularly in the agriculture and fishing sectors.\textsuperscript{34} As Rohingya refugees have turned to daily labor in the informal economy as a coping mechanism, the cost of daily wage labor has declined. Some estimates suggest these wages have declined from as much as 500 to 600 Taka per day to as little as 200 Taka per day.\textsuperscript{35} And as local teachers took jobs with humanitarian agencies in the refugee camps, schools have been left with insufficient teachers, exacerbating the challenges already facing the education system.\textsuperscript{36} The International Rescue Committee (IRC) has similarly found in focus group discussions with host community members that sources of tension center on economic frustrations around increased employment competition, business competition driving down wages (for jobseekers) and profits (for shopkeepers), and strains on local infrastructure due to population density.

A minority of locals have benefitted from the economic opportunities generated through increased demand for goods and services from the Rohingya refugees; however, these benefits are not felt evenly throughout the community.\textsuperscript{37} According to the latest Inter-Sector Coordination Group-REACH Host Community Multi-Sector Needs Assessment (MSNA) from December 2018, nearly eight in ten members of the host community reported a significant or moderate increase in the cost of living over the prior 12 months and about four in ten households reported that their economic status in the past 12 months had somewhat or significantly deteriorated.\textsuperscript{38}

Despite these self-reports, the Rohingya Emergency Vulnerability Assessment (REVA) found that there was not a significant change in the host community’s poverty levels between 2017 and 2018.\textsuperscript{39} Among members of the host community surveyed for the assessment, 83 percent were above the minimum expenditure basket in 2017 and 89 percent were above it in 2018. These maintained poverty levels are in part due to the increased access to non-food aid and conditional cash transfers from public service works.\textsuperscript{40} The mismatch between a perceived increase in poverty and actual poverty levels is, in part, attributed to

\begin{itemize}
  \item\textsuperscript{34} Ibid. and International Rescue Committee. 2019. Livelihoods Assessment of Refugees and Hosts in Cox’s Bazar: April 19 – May 6, 2019.
  \item\textsuperscript{39} The Refugee influx Emergency Vulnerability Assessment (REVA) uses the minimum expenditure basket as its poverty measure.
\end{itemize}
increasing perceptions of insecurity and the costs associated with the influx. IRC has spoken with some local government officials who have similarly indicated that the host community members who were most negatively impacted by the influx have received the support required to mitigate the impacts, and the JRP stipulates that at least 25 percent of donor funding to the crisis should go to host communities.

Impacts of the refugee influx extend to locals’ broader attitudes towards the Rohingya. Although initially welcoming, locals are increasingly feeling that the Rohingya have been in Cox’s Bazar for too long. A January 2019 Ground Truth Solutions survey on social cohesion found that despite the fact that 61 percent of Rohingya refugees believe there is harmony between the Rohingya and locals, only 30 percent of locals agree. Similarly, whereas only 11 percent of Rohingya indicated that there are inter-community tensions, 48 percent of locals said tensions exist. This sense has been reinforced by the government’s focus on return and its public messaging and presentation of displacement as temporary. Many locals have specifically expressed that the efforts of humanitarian agencies have been insufficient in mitigating the negative impacts on the host community. There are 39 organizations with programs across nine sectors in the host community. But a survey of the host community found that while 59 percent of locals are aware of humanitarian organizations’ activities and support for Bangladeshis, just 29 percent regularly come into contact with aid providers. The IRC has also heard firsthand from locals and some local government officials who have shared their frustration of watching aid vehicles drive through their communities every day to reach the camps and provide services for the Rohingya while locals have not received sufficient assistance.

A whole of society approach over the medium term takes into account the critical needs of the host community and the Rohingya population. Meeting the needs of both groups and ensuring that they have opportunities to create their own livelihoods in Cox’s Bazar can help mitigate negative impacts, reduce tensions, and foster social cohesion, as life in the district improves for everyone. In fact, the Ground Truth Solutions survey found that locals who came into contact with aid providers felt more positively about inter-community relations.

**IV. THE CASE FOR INVESTING IN SELF-RELIANCE: GENERATING BENEFITS AND MITIGATING NEGATIVE IMPACTS**

Core to the whole of society approach is generating self-reliance opportunities for locals and for refugees in Cox’s Bazar that can contribute to the longer-term development of Cox’s Bazar and ensure that Rohingya have the skills and resources to successfully reintegrate back to their locations of origin once voluntary, safe, dignified, and sustainable repatriation becomes possible. Two key facets to increasing self-reliance—income-generating opportunities and a quality education—are already priorities of the local host community and refugees alike. However, a number of factors currently hinder progress...
to meeting these priorities, including a lack of jobs, trainings, and apprenticeships, and poor-quality public education in Cox’s Bazar. For refugees, these constraints are compounded by national policies that prevent them from formal work and schooling.

Although the refugee crisis in Bangladesh is unique, there are many other refugee-hosting countries with similar concerns and challenges. A growing number of them are taking steps to improve refugees’ access to accredited education, vocational training, and formal employment. These countries have recognized both the risks that can be mitigated and the benefits that can be gained by implementing these policies.

The risks of failing to address these barriers to self-reliance are reflected in IRC’s experience working in protracted displacement contexts, especially with internally displaced populations in Myanmar for nearly a decade and with Burmese refugees in Thailand for nearly four decades. Analysis of internally displaced Rohingya encamped in Sittwe, Myanmar and do not have freedom of movement shows that overcrowded shelters led to an increase in deaths from preventable diseases and increased risk of intimate partner violence and child marriage. In Thailand, the lack of livelihoods opportunities for Burmese refugees, compounded by stress, trauma, and depression, has contributed to high levels of gender-based violence against women and girls, including domestic violence and early marriage, as well as alarming levels of suicide. When people sit idle and are depressed by a lack of livelihood opportunities, they may turn to negative coping strategies, leading to greater insecurity and weakened trust between refugees and host communities. Some of these trends are already present in Cox’s Bazar.

On the other hand, globally, evidence shows that creating access to decent work opportunities has significant potential to contribute to refugee self-reliance, allowing working-age refugees to meet their needs and the needs of their families, reduce their dependency on aid, and contribute to local economies. Evidence also shows school can be a safe haven for children and youth, reducing the risk of abuse, gender-based violence and forced recruitment, and give children the skills they need to become productive members of society. Not only will local communities and economies benefit from refugees becoming self-reliant, but self-reliance can also support more sustainable returns when that becomes a viable option.

Recognizing these risks and benefits, some host countries have regulations that allow refugees to access school and find employment. Jordan, for example, created avenues for refugees to secure work permits, and now allows refugees to own and operate home-based businesses. In Ethiopia, the government passed a new refugee law in 2019 that creates a pathway for refugees to have the legal right to move, live, and work outside of camps, and to attend public primary schools. In Uganda, the government permits refugees to work, cultivate land, and move freely. Through the 2017 Djibouti Declaration on Regional Refugee Education, eight African countries committed to include refugee children in their national education systems. And countries hosting mass numbers of Venezuelans, like Colombia, offer temporary legal status, including the right to work and access

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52 https://reliefweb.int/report/uganda/can-uganda-s-breakthrough-refugee-hosting-model-be-sustained
public education, to hundreds of thousands of Venezuelans who have entered their border over the
last few years. Colombia also grants citizenship to any child born within its borders—even those
with two Venezuelan parents.

These policies reflect the fact that refugees can make a positive contribution to the local economy. In Ugan-
da, for example, the government’s policies have enabled refugees to act as both suppliers of goods to Ugandan
workers. In areas where refugees have settled, Ugandans are important customers for refugees and refugees are regular customers for Ugandans. Some refugee-run shops are linked to a distribution network, generating profits for local Ugandan businesses, and some even extend their trade networks outside of Uganda, importing goods and products from Kenya and as far as Dubai and China.\(^{53}\) Turkey provides another example. A 2017 study by Building Markets found that there were
over 10,000 Syrian refugee-owned businesses in Turkey, and from 2011 to 2017, Syrians had invested nearly
US$334 million into more than 6,000 new companies. Businesses had been running about 2.5 years, and
their average annual revenue was more than US$450,000.\(^ {54}\) In turn, business owners’ tax revenues and
employees’ consumption of goods and services from their income have contributed to the local economy.

Extending access and rights to work and to education—even if incrementally—can help mitigate negative
impacts of the refugee influx and improve the local economy for everyone in Cox’s Bazar. In turn, ten-
sions between refugees and hosts are likely to wane, improving social cohesion. Of course, Bangladesh
should not be expected to do this on its own. Extending access to work and education to enable self-re-
liance will need to be complemented by a multiyear plan and adequate support from the international
community, as has been the case in other host countries that have adopted such policy reforms.

V. CURRENT CHALLENGES TO A WHOLE OF SOCIETY APPROACH

The reality of the increasingly protracted and complex nature of the Rohingya crisis combined with
global experience are clear indicators that a whole of society, development-oriented plan is the way
forward. However, to date, the response has hinged on a short-term vision focused on the Rohingya
population residing in camps. The government of Bangladesh has instituted a restrictive policy envi-
ronment, particularly as it relates to promoting self-reliance opportunities for refugees.

A robust shift in the response is needed not only to alleviate these policy barriers, but also to improve
coordination between humanitarian and development actors on the ground and to ensure that fi-
nancing is aligned around medium-term outcomes for refugees and locals. Programmatic interven-
tions for both refugees and hosting communities require adequate financing and need to be better
coordinated and more complementary to support social cohesion.

Policy barriers to refugee self-reliance

The government of Bangladesh has committed to not prematurely or involuntarily returning refu-
gees. At the same time, it remains reluctant to move beyond basic humanitarian assistance and ad-
dress Rohingya refugees’ medium-term needs. The government’s stance is, understandably, rooted
in a firm belief that the government of Myanmar must be held accountable for generating the Ro-
hingya refugee crisis and responsible for solving it. The government of Bangladesh takes this belief
one step further: it fears that taking greater responsibility for the Rohingya refugees over the lon-


sites/default/files/pdm_reports/another_side_to_the_story_a_market_assessment_of_syrian_smes_in_turkey.pdf
ger term would be construed as a step towards local integration and detract from the government of Myanmar’s responsibility to solve the root causes of the crisis and generate safe conditions for return. In addition, the government of Bangladesh is concerned that if the Rohingya are perceived to have a better life in Bangladesh, this will act as a “pull factor” for those Rohingya still residing in Myanmar, as well as a “stay factor” for Rohingya currently living in Cox’s Bazar.55

These concerns have resulted in a policy environment that restricts Rohingya’s access to livelihoods, cash, and accredited education, limiting the programming that humanitarian and development actors can deliver to refugees. Language in the UN’s JRP—which must be approved by the government—indicates there has been some backsliding in the government’s position. For example, the 2018 JRP included a pillar on “preparing for durable solutions in the short- and mid-term by promoting refugee self-reliance,” and the mid-term review of this plan notes that “more sustainable and scaled efforts are needed to enable refugees to become fully and meaningfully self-reliant.”56 However, due to government positioning, the 2019 JRP eliminated references to refugee self-reliance and replaced it with a weaker notion of “portable skills development.”

A similar change occurred around education for refugees. The 2018 JRP recognized that “access to certified education for all refugee boys and girls would build the resilience of the community as a whole.”57 By contrast, the 2019 JRP remains silent on formal, certified education and opts for much vaguer language: “Rohingya refugee children and youth need better access to learning opportunities to ensure their capacity to maximize whatever solutions materialize for themselves and their families.”58

The government’s policies and regulations that limit refugees’ access to livelihoods, cash, and education are ultimately preventing the Rohingya from becoming self-reliant and positively contributing to their local communities. However, in practice, implementers in Cox’s Bazar are piloting relevant, though insufficient, small-scale livelihoods activities and have worked with the government to approve the first two levels of an informal education framework. Still, national policies are preventing the implementation of a more impactful and efficient response that can benefit refugees and hosts.

**Restrictions on access to livelihoods for refugees**

Rohingya refugees do not have freedom of movement or the right to work in the local economy. The government considers such rights to be elements of local integration that move beyond basic humanitarian support. The government is also wary that if it allows Rohingya to work, there will be increased competition for the limited number of jobs in Cox’s Bazar, and that Rohingya will be willing to work for less income than the local population, driving down wages. While these are real concerns, there are steps that have proven successful in mitigating such impacts.

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Global analysis suggests that there may be negative effects on wages and employment rates in the short-term given the concentration of refugees entering the labor market. However, research findings show that providing refugees with access to formal labor markets means that the fiscal and labor

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market effects of refugee inflows ultimately tend to become positive over time, with contributions to increased GDP and rising average incomes for the host population. This research also shows that real concerns about short-term job competition between refugees and hosts can most effectively be addressed by deploying regulations alongside granting refugees access to formal labor markets. For instance, granting some freedom of movement to refugees and supporting inexpensive and safe transport to jobs for both populations can encourage geographic dispersion of workers. Granting access to the formal sector can reduce the concentration of workers in the informal sector, thus dispersing competition in a way that allows the labor market to absorb new workers without negative effects for the host population. Job competition can also be reduced through supporting the host community to upgrade their skills, improving their ability to take advantage of higher paying semi-skilled and skilled labor opportunities.  

To allay the host population’s fears and potential negative reactions to granting refugees access to the formal labor market, a limited number of permits can be granted and restrictions can be imposed on certain sectors—although such restriction may negate some of the benefits of granting labor market access.

Current government of Bangladesh policies also restrict income-generating activities in the camps, which would not necessarily require a full right to work and could help mitigate harmful coping strategies and high levels of vulnerability. For example, refugee-owned marketplaces within the camps are not formally permitted and training-for-work and cash-for-work programs run by UN agencies and NGOs are limited in the number of days refugees can participate and how much they can earn.

The short-term nature of, and low cash value disbursed through, these programs limits any genuine possibility for self-reliance over a sustained period. While there are still some small-scale activities, like skills building, vocational trainings, and home gardening, targeted towards Rohingya (see Box 1), the reality is that these efforts serve a fraction of the population and are not permitted to become income-generating activities. Rohingya women, for example, may be able to build their sewing and embroidery skills in women-friendly spaces through a training program, but they are not allowed to acquire a sewing machine or sell the items they create.

Restrictions on cash transfers

The government of Bangladesh remains resistant to the distribution of cash, especially unconditional cash, despite the proven efficiencies and effectiveness of cash transfers. The government’s concerns center on fears that cash could be wasted or used for criminal activities, or promote integration and become a pull factor for more Rohingya to cross the border from Myanmar. However, research shows these fears are unfounded. Cash assistance recipients overwhelmingly use their transfers to meet basic needs, with positive impacts for local economies (see Box 2). And there is no evidence to suggest that small amounts of cash would be a significant pull factor for the Rohingya; rather, it is the push factors of systematic violence and persecution that are the most compelling reasons for fleeing to Bangladesh.

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63 Cash-for-work is a livelihoods opportunity that allows refugees selected based on vulnerability criteria to earn money at a daily rate that they are able to spend based on their needs and priority, and can also temporarily reduce negative coping strategies.


Despite this overall stance, some small-scale conditional cash distributions have been permitted in the camps, for example, to procure LPG as an alternative fuel source and for the most vulnerable families to buy additional and/or specific types of food. Some Rohingya are also obtaining cash through cash-for-training and cash-for-work schemes. In addition, very recently, some NGOs have been allowed to test unconditional cash distribution in the camps on a limited scale. However, the government has remained closed to the idea of large-scale one-time cash distributions, for example for seasonal preparedness packages for “winterization” and monsoon season, as well as to regular cash grants.

**BOX 2. THE IMPORTANCE OF CASH TO SUPPORT LIVELIHOODS AND SELF-RELIANCE IN A MEDIUM-TERM RESPONSE**

Assessments show that nine out of ten Rohingya households could benefit from cash programming, allowing them to avoid negative coping mechanisms that lead to indebtedness and vulnerability. Cash and vouchers also have the potential to make positive impacts on the host community, including through supporting local traders and increasing sales.

While the expansion of e-voucher assistance allows refugees greater choice than traditional food aid distributions and supports local markets, it does not negate the importance of cash assistance. Cash assistance provides refugees with the most choice to purchase goods and services based on their families’ needs, while also providing the greatest benefit to the local community. A seminal IRC study on the impact of cash transfers to refugees in Lebanon found that each dollar that beneficiaries spent generated US$2.13 of GDP for the Lebanese economy. In other words, cash transfers can have a multiplier effect on the local economy.

To support livelihoods, cash should also be distributed to support business start-up, if and when refugees are allowed to run a business. Lack of access to capital—from a lack of cash transfers and a lack of access to banking—is among refugees’ biggest constraints to creating a livelihood.

**Lack of access to education and skills-building**

Although the government of Bangladesh is a signatory to the 1989 United Nations Convention on the Rights of the Child—which enshrines equal rights to education for all children—formal education is prohibited for the Rohingya. The government of Bangladesh views formal education as above and beyond humanitarian support, and perceives education taught in Bangla or aligned with the Bangladeshi curriculum would indicate a potential path to citizenship for the Rohingya.

Prior to the August 2017 influx, some 8,000 school-age children who were among the Rohingya who fled Myanmar in the early 1990s and lived in registered refugee camps in Cox’s Bazar, had access to nonformal education. Although these Rohingya children could not sit for national exams or receive formal accreditation for their schooling, they were ostensibly building academic and social skills. This access had taken decades to achieve: it was not until 2007 that the government of Bangladesh

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approved the nonformal education program with a certificate of completion through grade 8 to be taught in the registered camps. Some Rohingya had obtained documents showing their children were Bangladeshi nationals and registered them in formal schools; however, most—if not all—of these children were expelled from the schools in early January 2019 following a government crackdown.\textsuperscript{70}

Since the August 2017 influx, the government of Bangladesh has denied the Rohingya access to the nonformal curriculum and no longer permits education in Bangla in the registered camps, in favor of a consolidated policy for all refugees. In November of that year, the Department of Education issued a circular that restricted access to education by refugee children and stipulated that refugees’ education can only be informal and in the Burmese and English languages—prohibiting the use of Bangla. In January 2018, UNICEF, together with the Education Sector and other relevant experts, developed a Learning Competency Framework and Approach (LCFA) to guide education for Rohingya ages 4 to 18. In May 2019, after several rounds of review—and marking some progress—the government approved the first two of four levels of the framework. However, during this process, the government criticized the LCFA for being too formal and renamed it the Guideline for Informal Education Program for Children of Forcibly Displaced Myanmar Nationals in Bangladesh (GIEP) to emphasize the framework’s informality. The most concerning issue with the GIEP is that it is not aligned with any formal curric-

\textbf{BOX 3. LEARNING AS A ROHINGYA REFUGEE}

According to the 2019 JRP, more than 39 percent of children 3 to 14 years old and 97 percent of youth 15 to 24 years old are not accessing any type of education.\textsuperscript{71} As of June 2019, more than half of the Rohingya children and youth (approximately 341,500 out of 500,000) were enrolled in learning programs.\textsuperscript{72}

Humanitarian agencies offer informal learning for two to three hours per day, in learning centers. Home-based learning and mobile learning are also being piloted. These learning opportunities vary in terms of the quality and content. Instruction is conducted by “facilitators” who are not typically formally trained teachers. Most of the learning centers have a single room that is subdivided into four “classes” that conduct lessons simultaneously and are often separated by gender. In some learning centers, children have been attending the same “grades” for over one year—which has caused frustration among some parents and children. The language of instruction is limited to English and Burmese; Bangla is prohibited, making teacher recruitment even more difficult.

Critically, although more children and youth have been enrolled in learning opportunities and more learning facilities have been established and become functional over the past year (more than 4,800 in 2019),\textsuperscript{73} it remains unclear whether Rohingya children are actually attending learning sessions or whether they are learning. There is currently no systematic way of tracking attendance, teacher quality, or learning outcomes.

ulum that could lead to accreditation. Even if formal education eventually becomes available in Bangladesh, or if Rohingya move back to Myanmar, Rohingya’s educational attainment and certification will not be transferable to those national systems—effectively entrenching inequalities between the Rohingya and their peers. Creating a parallel education system has been a major misstep—though one the education sector is trying to rectify. UN agencies and other actors recently started to focus their energy on gaining access and permission to use the Myanmar curriculum and have it accredited in the camps in Cox’s Bazar.

The policy barriers to formal education are coupled with other operational and bureaucratic challenges, including identifying and training an adequate number of teachers and securing land to build new learning facilities (see Box 3). Space is extremely limited in the crowded camps and learning facilities have not been prioritized for land access nor land in the most convenient and safe locations. Some learning facilities may lack measures that can ensure children’s protection; for example, some facilities do not have latrines that are safe for girls to use. Finally, obtaining the Myanmar curriculum is a politically sensitive issue, raising concerns similar to the Bangladeshi curriculum in Bangladesh: the government of Myanmar does not recognize the Rohingya as citizens, and allowing them access to formal education could point towards a path to citizenship.

**Deficiencies in humanitarian and development coordination and a lack of shared priorities**

A clear set of joint outcomes and an effective coordination structure between international, national, and subnational levels of the response are foundational to a whole-of-society approach. However, the response to the Rohingya crisis in Bangladesh has faced significant coordination challenges since the start, leading to a fragmented, less effective approach.

Some of the shortfalls stem from a lack of clear and streamlined leadership across UN partners. The government of Bangladesh put the International Organization for Migration (IOM) in charge of the Rohingya response before the 2017 influx and, as a result, IOM has maintained a large leadership role—more than is typical in a refugee response, where UNHCR typically takes the lead. Although the two UN agencies have divided their responsibilities based on camp geography, there is still a lack of information-sharing, alignment, and complementarity between IOM and UNHCR, which frustrates partners on the ground and hinders the effectiveness of the response.74 In a similar vein, UNICEF has led the response around refugee education, maintaining the role it played before the influx in 2017. Again, whereas UNHCR typically leads the response, IOM, which has a different mandate and different relationship with the government and humanitarian actors, was designated the lead agency, creating confusion and challenges for implementing partners.75

Within the coordination structures (see Box 4), there are two key gaps that are contributing to a lack of coordination and potential misalignment between projects implemented and the realities and needs of the Rohingya and their host communities. The first gap is that there is no clearly defined way for Rohingya refugees and their hosts to participate in the policy and program decisions that will affect them. Although the JRP suggests mechanisms for refugees, hosts, and civil society groups to engage, they have not been consistently implemented. This is particularly troubling for the Rohingya, who

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75 Recognizing the challenges create by these initial structures, between September and October 2018, UNHCR, IOM, UNDP, and the International Council of Voluntary Agencies conducted a review of the coordination of the response, and in January 2019 published their recommendations for improving the structure. However, the recommendations were met with varying degrees of agreement across actors and have not been fully implemented.
are not citizens and therefore do not have the same rights or access to the national government. The second gap is that there are no official mechanisms where humanitarian and development actors are expected to coordinate their activities. While there are regular meetings of the donor community, which may include UN or government officials, there is seemingly no formal opportunity where other actors involved in the response—whether the World Bank or NGOs—can engage predictably and systematically.

A cause and consequence of these gaps in the coordination structure is a lack of shared outcomes for improvements in the lives and livelihoods of the Rohingya and Bangladeshis over time, let alone agreed targets and indicators to measure progress. Without a set of shared outcomes, there can be no joint action plan among all actors involved in the response. This not only leaves room for gaps and overlaps in activities, but also fails to shift the focus of the response to the crisis from emergency interventions to one focused on self-reliance for refugees and their hosts.

**Funding gaps**

A critically important challenge for the government of Bangladesh is insufficient international aid to support the Rohingya response—and the likelihood that resources will dwindle over time. Globally, humanitarian financing is inadequate in scale to meet the needs of those facing protracted displacement, and is not designed to meet the long-term needs of refugees and host communities. The greatest gaps in funding are often found in critical sectors such as protection, livelihoods, and education, and levels of assistance contributed to humanitarian appeals continue to decrease as crises draw on.

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In Bangladesh, the 2018 JRP was 69 percent funded, leaving a funding shortfall of nearly US$300 million.\(^77\) and as of July, the 2019 JRP was 34 percent funded.\(^78\) This funding gap reinforces the importance of spending funds efficiently and on interventions that reduce people’s reliance on aid. In 2018 a large percentage of the JRP funding was spent on food aid; while food aid is a critical, lifesaving tool, promoting self-reliance activities could achieve greater value for money and reduce aid dependency over time.

Multiyear financing—alongside multiyear planning and programs—is critical to a successful response in a protracted crisis, like the Rohingya crisis. Yet most grants to humanitarian organizations are short term, typically one year in length. These short-term contracts pose a number of challenges. For example, short-term financing makes it difficult to achieve outcomes for populations, which can take longer than a year to achieve. Administrative costs to implementing organizations are incurred when staff have to be let go and then rehired between contract periods; when locals are hired to fill these jobs and then laid off between contracts, frustrations and even protests can occur.

Some donors have committed multiyear financing to the response, recognizing the shortcomings of short-term financing. However, this more efficient and impactful financing is being undermined; programs are only being planned for one year at a time, in part to align with the one-year time horizon set by the JRP and the short-term view of the government. Development financing from international financial institutions like the World Bank and the Asian Development Bank has been negotiated with the government of Bangladesh. The World Bank has committed US$480 million to support host and refugees and the Asian Development Bank has committed US$200 million to support the response. There is also a multi-donor trust fund in discussion among development donors. These funds hold great promise for improving the lives and livelihoods of refugees and local populations, but planning and implementation will need to be strategic to ensure the financing has a significant impact. These bank-funded programs will need to take a medium-term development approach, complementing the work of the UN and other humanitarian agencies that are meeting immediate, lifesaving needs.

VI. OPPORTUNITIES TO CREATE A SHARED MEDIUM-TERM VISION FOR COX’S BAZAR

At the time of writing, there is a district level development plan being scoped by the Office of the Deputy Commissioner of Cox’s Bazar, which could provide a good starting point for a whole of society, development-led approach for improving the lives and livelihoods of local Bangladeshis and Rohingya refugees. Although the initial concept for the district plan is to focus on the local population only, the Office of the Deputy Commissioner and partners should consider how this plan could be expanded and create an opening to scaling up livelihoods opportunities and improving the quality of education for the local population and for the Rohingya. As this note has argued, one strong rationale for doing so is that improving the livelihoods of both communities will generate social cohesion.

The World Bank and the Asian Development Bank (ADB) have leading roles to play in the creation of a medium-term development plan. Efforts by the World Bank to focus further investment on both infrastructure and system strengthening interventions in Cox’s Bazar are a critical start. For these investments to have a transformative impact, the World Bank should align its investments with a wider

whole of society approach that seeks to identify development gains for the district and all affected communities, and in doing so support national progress towards the implementation of the SDGs. World Bank financing should go a step further to support policy reforms that have been shown to mitigate the impact of refugee influxes on local employment markets, for example, enabling some refugees to access labor market and putting in place a plan to move from an informal learning program to one aligned with an accredited curriculum. Enabling and leveraging policy reforms is a core tenet of the World Bank's IDA Sub-Window for Refugees and Host Communities—the source of these funds. Although the World Bank has successfully supported important policy reforms in a number of other contexts where it has deployed this financing, such as in Jordan, Ethiopia, Lebanon, and Pakistan, it has yet to successfully secure them in Bangladesh—which is a major missed opportunity.

Similarly, the infrastructure projects supported by the ADB should align with the local development plan for Cox's Bazar. The ADB can also consider creating a specific financing mechanism, similar to the World Bank's IDA Sub-Window for Refugees and Host Communities, which makes grants and concessional loans available to Bangladesh and other countries in Asia and the Pacific that are hosting large numbers of refugees.

Any long-term vision for the development of Cox's Bazar will require national ownership and leadership. Previous attempts to achieve inclusive gains in Bangladesh, including as early as the 2009 joint UNHCR-International Labour Organization Self Reliance Strategy for Rohingya Refugees and the Host Community (2010-2013) as well as UNHCR's 2018 Solidarity Approach, have gone unimplemented in part because of a lack of national government buy-in. Any attempt at a new plan should bring in all levels of government (i.e., key officials in Cox's Bazar and in Dhaka) from the start, and outline the clear political and economic wins for Bangladesh and the local population.

Under government leadership, a whole of society approach will require strong commitment and coordination among a diverse set of international and national stakeholders. The World Bank can use its unique convening power, as it has done in Jordan and Ethiopia, to bring a diverse set of actors to the table, including development, private sector, and humanitarian actors, to deliver on a shared agreement on the approaches required to deliver medium-term outcomes for both Rohingya and the host community. This convening would give actors an opportunity to share their assessments of the needs of the refugees and host populations, and identify and coordinate interventions, policy reforms, funding, and other tools, such as private investment or trade concessions. It would also provide a platform where actors could share experiences from other protracted refugee responses, as well as from the response in Cox’s Bazar, dating back to the 1990s. While many of the livelihoods initiatives in Cox’s Bazar today are at a micro level, they can provide examples of ways that programs can contribute to the local economy and the well-being of beneficiaries.

**VII. RECOMMENDATIONS**

The inevitable protracted nature of the refugee crisis, combined with the increasingly pressing challenges faced by the Rohingya and their hosts, demands an immediate shift to a medium-term (three to five years) whole of society approach. This approach, which requires investing in the development of Cox’s Bazar, can support Bangladesh in achieving its commitment to the SDGs and its own national development objectives, while allowing the Rohingya to build skills that will help them create a livelihood in their current environment and support sustainable returns. It will also, critically, facilitate greater social cohesion between the Rohingya and their host communities by addressing the needs and improving the well-being of both populations.
Moving forward, three pillars of action should be prioritized by national and international actors:

1. **The government of Bangladesh, with development and humanitarian actors, should develop a three-to-five-year whole of society medium-term response plan** that addresses the well-being needs of, and enables self-reliance among, Rohingya refugees and the Bangladeshi host community in Cox’s Bazar.

   The plan must:
   - Define a set of outcomes and indicators to measure progress towards improved well-being for refugees and host communities. Bangladesh’s national development objectives, the Sustainable Development Goals, provide as a starting point
   - Define a set of shared actions designed to meet infrastructural needs, expand the provision of quality health and education services, and strengthen local markets through improved livelihoods opportunities in Cox’s Bazar
   - Identify incremental steps to expand refugees’ access to the labor market (e.g., work permits in select sectors), freedom of movement, and access to quality, accredited education (e.g., the Myanmar curriculum). A first step towards this could be to give Rohingya refugee status.

2. **The government of Bangladesh, with development and humanitarian actors, should create a coordination platform** that is responsible for designing the plan, coordinating its implementation, and monitoring its progress towards agreed outcomes.

   This platform should:
   - Be government led and include senior representation from line ministries, subnational government entities, bilateral and multilateral donors, UN agencies, development and humanitarian implementing partners, and Rohingya refugee and host community populations
   - Act as the mechanism that coordinates information-sharing about population needs and socioeconomic outcomes, and ongoing and proposed programming for refugees and hosts
   - Solve issues around access and restrictions on programming and ensure programs are evidence based, needs based, support social cohesion, address gender inequities, and link with local markets where appropriate
   - Meet on a predictable, regular basis and be transparent about its decision-making.

3. **The international community—particularly donors, UN agencies and the private sector—should provide adequate and appropriate support for the implementation of the plan.**

   This should include:
   - Multiyear financing streams committed by multilateral development banks and by bilateral donors to meet the needs of refugees and host communities. Importantly, UN agencies must be able to pass on multiyear financing it receives from donors to its implementing partners
· Economic incentives, such as private investment in the development of Cox’s Bazar and other “beyond aid” measures such as trade concession agreements to boost exports

· Continued engagement by donor countries with the government of Myanmar to improve the conditions for safe, voluntary, dignified, and sustainable returns of Rohingya.

These objectives are ambitious and cannot be delivered overnight given the very real political barriers and sensitivities. But the current situation is driving increased risks to Bangladeshi hosts and Rohingya refugees. The response can no longer rely on band-aid approaches. A change in course is needed now.