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Written Statement submitted by
The Advocates for Human Rights, an NGO in special consultative status

Founded in 1983, The Advocates for Human Rights (The Advocates) is a volunteer-based non-governmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact-finding, direct legal representation, education and training, and publications.

At the request of the Liberian Truth and Reconciliation Commission (TRC), The Advocates coordinated the work of the TRC in the United States, the United Kingdom, and the Buduburam Refugee Settlement in Ghana. In May and October 2007, The Advocates staff and volunteers documented TRC statements from more than 700 individual Liberians in the Buduburam settlement. The Advocates also conducted fact-finding interviews with camp management, Ghanaian police, the leadership of the Liberian Refugee Welfare Council, Liberian community-based organizations on the camp, Ghanaian NGOs working on the camp, and aid workers. In a follow-up visit to the camp in March 2010, The Advocates again conducted fact-finding interviews with human rights NGOs working on the camp, people receiving services from those NGOs, representatives of the U.N. High Commissioner for Refugees, representatives of Ghana's Commission on Human Rights and Administrative Justice, Ghanaian police, school officials, the manager of the camp, and aid workers. In addition to these fact-finding visits, The Advocates has also actively monitored the situation in Buduburam through email and telephone communication with individual refugees, community leaders, human rights NGOs working with Liberians in Ghana, aid workers, and Liberian Embassy representatives.

I. EXECUTIVE SUMMARY

1. At the end of 2011, 11,301 Liberian citizens were registered with UNHCR and the Ghana Refugee Board (GRB).¹ Since Ghana's first Universal Periodic Review, Liberians living in the Buduburam settlement have faced many challenges. The cessation clause has been invoked effective 30 June 2012, meaning that Liberians in Ghana will no longer be deemed refugees after that date. Policies and practices of the Ghanaian Government directly affect the lives of Liberians, with respect to both living conditions and cessation-related issues.

2. This submission addresses developments in the human rights situation in Ghana, particularly with respect to non-citizens. It calls attention to the legal status of and conditions affecting Liberians living in the Buduburam refugee settlement in Ghana. During the last Universal Periodic Review in 2008, Ghana rejected only two recommendations, one of which urged Ghana to “[c]ontinue upholding the rule of law, raising public awareness of human rights standards, and fighting against discrimination, in particular against minority groups, *immigrants*, and children with disabilities.”² The Advocates notes with concern that Liberian refugees living in Ghana face discrimination with respect to employment, education, housing, and access to health care, as well as violations of their rights to health, food, water, and education. The Advocates is concerned that Liberians may be selected for local integration on an arbitrary or discriminatory basis. The Advocates is also concerned that Liberians living in Ghana will become increasingly vulnerable to discrimination and other human rights violations after cessation. Moreover, there is a danger that Liberians—including those with legitimate asylum claims—will be deported without due process of law. The Advocates urges the Ghanaian Government to ensure that no Liberian is forcibly repatriated and to protect and promote the rights of all Liberians remaining in Ghana.

II. DOMESTIC AND REGIONAL LEGAL FRAMEWORK

3. The Constitution of Ghana recognizes certain Fundamental Rights and Freedoms belonging to “[e]very person in Ghana, whatever his race [or] place of origin”³ As relevant here, “no person shall be deprived of his personal liberty except . . . for the purpose of . . . effecting the expulsion . . . or other lawful removal of that person from Ghana.”⁴ All persons are equal before the law and no person shall be subject to discrimination “on grounds of . . . race, . . . ethnic origin, . . . or social . . . status.”⁵ But parliament may enact “laws . . . to provide . . . for the imposition of restrictions on the acquisition of land by persons who are not citizens of Ghana or on the political and economic activities of such persons and for other matters relating to such persons.”⁶ “[B]asic education shall be free, compulsory and available to all.”⁷

4. Liberians' status as refugees will cease on June 30, 2012. The GRB has announced a three-month grace period after cessation.⁸ As of October 1, 2012, therefore, the Buduburam settlement will be closed and the Ghana Immigration Authority will deem to be “illegal immigrants” all Liberians remaining in Ghana who are not selected for local integration.⁹ UNHCR is offering repatriation packages to people wishing to return to Liberia, but as of March 2012, only 450 Liberians expressed interest.¹⁰ UNHCR reports that across West Africa, “some . . . 16,000 Liberians . . . might opt for local integration in 2012.”¹¹

5. It is unclear what local integration entails or whether it will be available to all Liberians. A UNHCR representative suggested that all Liberians could “legalize their stay in Ghana as ECOWAS nationals.”¹² But ECOWAS protocols give participating states “discretion to determine whether non-nationals are admissible.”¹³ The former Senior Legal Adviser in UNHCR’s Legal Advice Unit for Africa expressed concern that states may invoke “overly broad or arbitrary grounds of inadmissibility.”¹⁴ The GRB Programme Coordinator reportedly “indicated that those who would opt for local integration would be screened and selected to have their track record.”¹⁵ According to UNHCR, the Ghanaian Government “indicated that its decision to approve local integration . . . would depend on the size of the remaining Liberian refugee population and *their socio-economic situation*.”¹⁶ According to a staff member of an organization working at Buduburam, “the package still remains unclear and . . . [A]uthorities responsible . . . remain tight-lip[ped].”¹⁷ In February 2012, a respected Liberian leader of a Buduburam NGO told The Advocates that she understood that people selected for local integration would be allowed to stay in Ghana only until December 2012.¹⁸ Both individuals reported that “the camp has been without a governing council since 2010,” meaning there is no organized way for Liberians to receive relevant information.¹⁹ UNHCR Ghana has disseminated inconsistent information about application deadlines.²⁰

III. PROMOTION AND PROTECTION OF HUMAN RIGHTS ON THE GROUND: THE RIGHTS OF NON-CITIZENS

A. Equality and non-discrimination

6. Non-Ghanaians in Ghana face discrimination based on national origin, nationality, and ethnicity, in violation of the non-discrimination provisions contained in all relevant human rights instruments. Many participants in one study of Liberians in Buduburam identified “discrimination as a major stressor related to living in Ghana.”²¹ Every participant “reported experiencing discrimination or inequality of some sort during their stay in Ghana. Many believed that their refugee status barred them from equal access to resources and opportunities afforded to Ghanaian citizens.”²²

7. Liberians living in Buduburam reported to The Advocates that discrimination interferes with their right to work. One Liberian woman reported that although she tried to sell goods in the marketplace, upon hearing her Liberian accent Ghanaians either force her to sell her goods at much lower prices or outright refuse to buy her goods, even if the goods are of the same or even better quality than those offered by Ghanaians.²³ Many Liberian refugees interviewed by The Advocates commented that they felt their Liberian-accented English and inability to speak Twi (the primary Ghanaian indigenous language) intensify discrimination against them and hinder their ability to sell goods.²⁴ Liberians are authorized to work in the formal sector, but many report facing discrimination when seeking employment.²⁵ One woman who attended nursing school in Ghana reported that her “classmates, Ghanaians, are employed, and I am not able to [get] employed because I am a Liberian. It’s discrimination.”²⁶

8. Liberians face discrimination in access to health care. Medical fees for Liberians are calculated in foreign currency, using an inflated conversion rate.²⁷ One Liberian who was hit by a car in Accra reported that after realizing he was Liberian, one hospital delayed treatment for

nearly six hours and then refused to admit him because he lacked health insurance, while another hospital refused to treat him until he paid US\$100.²⁸

9. Liberians face housing discrimination. Some refugees reported that their Ghanaian landlords require them to pay full-price rent for unfinished dwellings, with the expectation that the refugees will complete the work at their own expense.²⁹ After the work is completed, the landlord doubles the rent.³⁰

10. Liberians fear that societal discrimination will increase post-cessation.³¹ Ghanaians are likely to perceive Liberians' continued presence as illegitimate, even for Liberians lawfully remaining in Ghana.³² Discrimination will likely create barriers to effective integration and will impede fulfillment of Liberians' human rights.³³

B. Right to life, liberty and security of the person

11. The annual premium for Ghana's national health insurance scheme is 25 cedis.³⁴ (Young adults in Buduburam earn an average of 4.7 cedis per month, according to one survey, with two-thirds reporting no income at all.³⁵) In 2009, UNHCR reported that only 3,000 persons in Buduburam were enrolled in the scheme.³⁶ As of February 2012, refugees are charged fees for medical services at the clinic.³⁷ As noted above, those fees are calculated using an inflated foreign-currency conversion rate.

12. The Ghana Health Service runs the Buduburam community clinic, the only place to receive medical treatment in Buduburam.³⁸ The clinic faces monumental financial challenges and provides only a limited number of basic services.³⁹ For example, the clinic has not provided mental health treatment since December 2009, when UNHCR cut off funding.⁴⁰ Doctors perform only basic procedures in the clinic's operating room because they lack anesthesia.⁴¹ The many Liberians in Buduburam with limited financial resources do not have meaningful access to health care. Post-cessation, it is likely that Liberians remaining in Ghana unlawfully will be reluctant to seek medical care.⁴² They will be at heightened risk of developing or exacerbating serious health problems.

13. The dearth of employment opportunities in Buduburam is a barrier to access to safe water and adequate nutrition. Food and water are provided through a market-based distribution system, and therefore are frequently inaccessible to the many Liberians who are unable to find paid employment.⁴³ Some women have turned to sex work to generate income to purchase food.⁴⁴ One Liberian woman reported: "One of the serious issues I see on the camp, . . . [s]ome of the girls . . . have to sleep with some boys to get money to eat. . . . They don't want to do it, but they're forced to do it just to get money to support . . . their family."⁴⁵

14. Refugees living on the camp must pay to use toilet facilities.⁴⁶ Refugees who are unable to pay must go to an area on the edge of the settlement, where local Ghanaians sometimes subject them to verbal and physical harassment.⁴⁷ One pregnant woman using this area was beaten by a Ghanaian man, causing near-fatal injuries.⁴⁸

15. Security in Buduburam is increasingly tenuous. Local authorities have encouraged Ghanaians to move in and claim things on the camp.⁴⁹ A Liberian NGO told The Advocates that the result is “a situation of chaos and confusion.”⁵⁰ In January 2012, police swept Buduburam and took dozens of Liberian men into custody.⁵¹ The police did not charge them but demanded large sums of cash before releasing them.⁵²

16. After cessation, Liberians remaining unlawfully in Ghana will face more obstacles to obtaining basic necessities and maintaining security.⁵³ Liberians may be driven to dangerous and unlawful means of earning a living.⁵⁴ And because they will be in the country unlawfully, they will be unwilling to seek out police protection or medical services.⁵⁵

C. Administration of justice and the rule of law

17. “Ghana’s refugee legislation provides asylum-seekers of all nationalities equal access to procedures and the possibility of remaining in the country until any appeal has been denied.”⁵⁶ The GRB decides all asylum applications. According to the U.S. State Department, “[f]ollowing the January 2009 presidential election, the incoming administration appointed new board members. However, because the government had not appointed a GRB board chairman by year’s end, the board was unable to function. While the GRB secretariat continued some functions such as conducting refugee interviews, there were no board meetings to adjudicate claims or to confer refugee status during the year.”⁵⁷

18. Many Liberians who applied for asylum⁵⁸ do not know their legal status because the GRB has not notified them of the outcome of their applications.⁵⁹ Post-cessation, there is a danger that Liberians who have valid, individualized asylum claims under international law will be deported without resolution of their claims and appeals.⁶⁰ Moreover, Liberians who have not received notice from the GRB by June 30 may feel coerced to accept repatriation rather than await resolution of their claims. In March 2008, a group of Liberians from Buduburam was summarily deported from Ghana,⁶¹ and The Advocates is concerned that, post-cessation, Liberians will again be deported without due process.⁶²

19. The Advocates is concerned that the GRB has not clarified eligibility standards or a selection process for local integration, and that some Liberians believe that everyone is entitled to local integration. Hence, some Liberians may elect local integration, only to learn that they have not been selected and that it is too late for a voluntary repatriation package. As noted in Part II, the camp lacks a governing council through which to disseminate accurate information, and there is a danger that Liberians will be selected in an arbitrary or discriminatory manner. Moreover, to the extent Liberians will be selected based on socio-economic status or ability to support themselves, the selection process will amplify the harmful effects of some of the human rights violations that Liberians have faced in Ghana.

D. Right to work and to just and favorable conditions of work

20. According to UNHCR, the Ghanaian Government “has indicated that its decision to approve local integration (alternative legal residential status) for refugees would depend on the size of the remaining Liberian refugee population and their socio-economic situation. UNHCR therefore

worked to ensure that refugees were equipped with marketable skills to further their self-reliance.”⁶³ UNHCR’s 2009 report on its activities in Buduburam states: “[a]lmost 1,000 refugees were trained in various skills and provided internationally recognized certificates to help them become self-reliant and integrate locally.”⁶⁴ But some Liberians have been unable to pay the necessary school fees for this vocational training.⁶⁵ Moreover, Liberian refugees reported to The Advocates that students must purchase materials to participate in these classes, and that they often do not have the resources to purchase sufficient materials to complete coursework.⁶⁶ And even if students are able to complete training, organizations reported to The Advocates that there are few jobs in the fields for which they are trained.⁶⁷ As discussed in Part A, this training is of little use to Liberians who face discrimination from potential customers and employers.

E. Right to education

21. The 1951 Refugee Convention requires State Parties to “accord to refugees the same treatment as is accorded to nationals with respect to elementary education.”⁶⁸ For Ghanaian nationals, “[p]rimary and junior secondary school education is tuition-free,”⁶⁹ but the vast majority of Liberian refugees living at Buduburam must pay to attend school.⁷⁰ The Buduburam Refugee Community School, one of the larger schools in Buduburam, charges school fees of US\$10 per term for a three-term school year.⁷¹ A handful of schools in Buduburam are church-run, but even students who attend these tuition-free schools must purchase uniforms, which cost US\$5 to US\$7.⁷² As a result of these costs, many Liberian children do not attend school or attend only sporadically. One refugee explained: “Most of the children here are not in school because you can’t work to send them to school, and the money is very very hard.”⁷³

22. Liberians face indirect education discrimination. A Liberian journalist who lived in Buduburam reported that the schools have never had any Ghanaian instructors and have never received any Ghanaian officials for school inspections.⁷⁴ Because Buduburam schools are not integrated into the Ghanaian educational system, the Ministry of Education does not monitor their curriculum to ensure adequate preparation for the examination, and students are unprepared for national school-leaving examinations.⁷⁵ Those examinations cost US\$90, posing another barrier to access to education.⁷⁶ In 2010, only three students from the settlement were able to register for the examination.⁷⁷

23. Post-cessation, it is likely that Liberian children remaining in Ghana unlawfully will have no meaningful access to education whatsoever.⁷⁸ The Buduburam schools will be closed to Liberians, and parents will be reluctant to register their children in other schools lest authorities detect their unlawful presence.⁷⁹

IV. ACHIEVEMENTS AND BEST PRACTICES

24. The Advocates commends the Ghanaian Government for accepting and hosting Liberian refugees for more than 20 years, for allowing Liberian refugees the opportunity to apply for local integration, and for its efforts to facilitate voluntary repatriation. The Advocates further commends Ghana for recognizing a three-month grace period after cessation.

V. RECOMMENDATIONS

25. The Advocates welcomes Ghana's stated commitment to promote human rights. Ghana must, however, take additional steps to protect the rights of Liberians during this critical transitional period. Toward that end, we recommend that Ghana:

- Clarify and publicize the selection standards, process, and benefits of local integration, and extend the grace period for two months thereafter;
- Create a public-awareness campaign to address and combat discrimination against non-Ghanaians and to explain the status of Liberians selected for local integration;
- Periodically follow-up with locally integrated Liberians to assess their human rights situation and address any human rights violations;
- Ensure that Liberian asylum applicants receive full, individualized adjudication of their claims and appeals and adequate notice of decisions;
- Give rejected asylum applicants one month after receiving notice of resolution of their appeal to apply for integration or repatriation;
- Assist all Liberians not selected for integration in applying for voluntary repatriation;
- Ensure that no person is deported from Ghana without due process of law;
- Make primary schooling available free-of-charge to all Liberian children, prohibit schools from collaborating with authorities to identify undocumented Liberians, and publicize these changes among Liberians;
- Prohibit police forces from asking crime victims about their legal status and prohibit health care providers from asking patients about their legal status, and create an awareness campaign to inform Liberians of these prohibitions;
- Ensure that Liberians may purchase health care at market-based exchange rates.

ENDNOTES

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- ¹ See Liberian refugees eager to return home, Modern Ghana, 6 February 2012, available at <http://www.modernghana.com/news/376570/1/liberian-refugees-eager-to-return-home.html> (last visited 6 April 2012) (quoting statement from Padi Tetteh, Programme Coordinator, Ghana Refugee Board, during a press conference on 6 February 2012).
- ² Report of the Working Group on the Universal Periodic Review: Ghana, U.N. Doc. No. A/HRC/8/36 (29 May 2008), para. 24 (recommendation of Romania) (emphasis added); Responses to Recommendations: Ghana, UPR-Info.org, at 3 (25 February 2010), available at http://www.upr-info.org/IMG/pdf/Recommendations_Ghana_2008.pdf (last visited 13 March 2012).
- ³ Constitution of Ghana, ch. 5, art. 12(2), available at <http://www.ghanaweb.com/GhanaHomePage/repUBLIC/constitution.php> (last visited 13 March 2012).
- ⁴ *Id.*, art. 14(1)(f).
- ⁵ *Id.*, art. 17(1)–(2).
- ⁶ *Id.*, art. 17(4)(c).
- ⁷ *Id.*, art. 25(1)(a).
- ⁸ See, e.g., Ghana Refugee Board encourages more Liberian refugees to repatriate, Ghana News Link, 9 March 2012, available at <http://www.ghananewslink.com/?id=20192> (last visited 6 April 2012) (citing a statement by Padi Tetteh, Programme Coordinator, Ghana Refugee Board).
- ⁹ See, e.g., *id.* (citing a statement by Padi Tetteh, Programme Coordinator, Ghana Refugee Board).
- ¹⁰ See, e.g., *id.* (citing a statement by Padi Tetteh, Programme Coordinator, Ghana Refugee Board).
- ¹¹ UNHCR, Ghana: 2012 Regional Operations Profile - West Africa, available at <http://www.unhcr.org/cgi-bin/texis/vtx/page?page=4a03e2f76> (last visited 6 April 2012).
- ¹² Liberian refugees eager to return home, Modern Ghana, 6 February 2012, available at <http://www.modernghana.com/news/376570/1/liberian-refugees-eager-to-return-home.html> (last visited 6 April 2012) (quoting statements from Ewurabena Hutchful, UNHCR Assistant Public Information Officer, during a press conference on 6 February 2012).
- ¹³ Alistair Boulton, Local integration in West Africa, Forced Migration Review (September 2009), at 34, available at <http://www.cdainc.com/cdawww/pdf/article/FMR33.pdf> (last visited 6 April 2012).
- ¹⁴ *Ibid.*
- ¹⁵ See, e.g., Ghana Refugee Board encourages more Liberian refugees to repatriate, Ghana News Link, 9 March 2012, available at <http://www.ghananewslink.com/?id=20192> (last visited 6 April 2012) (citing a statement by Padi Tetteh, Programme Coordinator, Ghana Refugee Board).
- ¹⁶ UNHCR Global Report 2009, at 110, available at <http://www.unhcr.org/4c08f2339.html> (last visited 14 March 2012) (emphasis added).
- ¹⁷ Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ¹⁸ Telephone Interview with director of NGO working on women’s issues at Buduburam, 6 February 2012.
- ¹⁹ *Ibid.*; Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ²⁰ See Cessation Q&A, UNHCR Ghana, 3 April 2012, available at <http://www.unhcr-ghana.org/node/196> (last visited 9 April 2012) (identifying deadline for electing repatriation or local integration as 30 March 2012 in some portions of the document and as 30 April 2012 in other portions of the document).
- ²¹ Abena Gyamfuah Sarfo-Mensah, Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 19 (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ²² *Id.* at 20.
- ²³ Interviews with member of Harmony Disability Centre, 11 March 2010.
- ²⁴ *Ibid.*
- ²⁵ Abena Gyamfuah Sarfo-Mensah, Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 24–25, 27 (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ²⁶ *Id.* at 24. A Liberian man commented: “A Ghanaian will never leave a Ghanaian unemployed and then employ a Liberian, which is very impossible. So when it comes to employment, . . . it’s zero for us.” *Ibid.*
- ²⁷ Telephone Interviews with Liberian pedestrian hit by car, November 2011.

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- ²⁸ *Ibid.*
- ²⁹ Abena Gyamfuah Sarfo-Mensah, *Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 23–24* (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ³⁰ *Ibid.*
- ³¹ Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ³² *Ibid.*
- ³³ *Ibid.*
- ³⁴ Interview with St. Gregory’s Clinic, 12 March 2010.
- ³⁵ Abena Gyamfuah Sarfo-Mensah, *Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 16* (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ³⁶ UNHCR Global Report 2009, at 111, available at <http://www.unhcr.org/4c08f2339.html> (last visited 14 March 2012).
- ³⁷ Telephone Interview with director of NGO working on women’s issues at Buduburam, 6 February 2012.
- ³⁸ UNHCR Global Report 2009, at 111, available at <http://www.unhcr.org/4c08f2339.html> (last visited 14 March 2012); Interview with St. Gregory’s Clinic, 12 March 2010.
- ³⁹ Interview with St. Gregory’s Clinic, 12 March 2010; Individual Interviews at Harmony Disability Center, 10–12 March 2010.
- ⁴⁰ Interview with St. Gregory’s Clinic, 12 March 2010.
- ⁴¹ *Ibid.*
- ⁴² Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ⁴³ Interview with Liberian women and girls at Holistic Perfect Look Training Institute, 12 March 2010.
- ⁴⁴ Abena Gyamfuah Sarfo-Mensah, *Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 27–29* (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ⁴⁵ *Id.* at 28–29.
- ⁴⁶ Interview with Liberian women and girls at Holistic Perfect Look Training Institute, 12 March 2010.
- ⁴⁷ *Ibid.*
- ⁴⁸ Abena Gyamfuah Sarfo-Mensah, *Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 22–23* (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ⁴⁹ Telephone Interview with director of NGO working on women’s issues at Buduburam, 6 February 2012.
- ⁵⁰ *Ibid.*
- ⁵¹ Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012; Police arrests over 40 suspects in Kasoa swoop, CitiFMOnline, 11 January 2012, available at <http://www.citifmonline.com/index.php?id=1.731361> (last visited 9 April 2012).
- ⁵² Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ⁵³ *Ibid.*
- ⁵⁴ *Ibid.*
- ⁵⁵ *Ibid.*
- ⁵⁶ UNHCR Global Report 2009, at 109, available at <http://www.unhcr.org/4c08f2339.html> (last visited 14 March 2012).
- ⁵⁷ 201 U.S. Department of State, *Human Rights Report: Ghana*, at 15–16, available at <http://www.state.gov/documents/organization/160124.pdf> (last visited 14 March 2012).
- ⁵⁸ The Advocates for Human Rights, *Submission to the African Commission on Human and Peoples’ Rights*, at 3. June 30, 2009, available at http://www.theadvocatesforhumanrights.org/uploads/final_submission_to_the_achpr.pdf (last visited 6 April 2012).
- ⁵⁹ *Ibid.*
- ⁶⁰ Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
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- ⁶¹ The Advocates for Human Rights, Submission to the African Commission on Human and Peoples' Rights, at 2. June 30, 2009, available at http://www.theadvocatesforhumanrights.org/uploads/final_submission_to_the_achpr.pdf (last visited 6 April 2012).
- ⁶² Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ⁶³ UNHCR Global Report 2009, at 110, available at <http://www.unhcr.org/4c08f2339.html> (last visited 14 March 2012).
- ⁶⁴ *Id.* at 109.
- ⁶⁵ Abena Gyamfuah Sarfo-Mensah, Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 27 (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ⁶⁶ Interview with New Liberian Women Organization, 11 March 2010.
- ⁶⁷ Interview with director of NGO working on women's issues at Buduburam, 11 March 2010.
- ⁶⁸ Convention relating to the Status of Refugees, 189 U.N.T.S. 150, art. 22(1), *entered into force* April 22, 1954.
- ⁶⁹ U.S. Department of State, *Background Note: Ghana*, 21 December 2011, available at <http://www.state.gov/r/pa/ei/bgn/2860.htm> (last visited 19 March 2012).
- ⁷⁰ Interview with Buduburam Refugee Community School, 10 & 12 March 2010; Email from Koryan Korklison, principal of the Buduburam Refugee Community School, 28 April 2010.
- ⁷¹ Interview with Buduburam Refugee Community School, 10 & 12 March 2010.
- ⁷² Interview with Baptist Church Elementary School, 11 March 2010.
- ⁷³ Abena Gyamfuah Sarfo-Mensah, Coping Methods and Meaning Making of Liberian Refugees in the Buduburam Refugee Camp of Ghana 27 (2009), Honors Scholar Thesis Paper 114, available at http://digitalcommons.uconn.edu/srhonors_theses/114/ (last visited 15 March 2012).
- ⁷⁴ Telephone Interview with Jefferson Cooper, Liberian journalist, 9 April 2012.
- ⁷⁵ *Ibid.*
- ⁷⁶ Interview with Buduburam Refugee Community School, 10 & 12 March 2010; Email from Koryan Korklison, principal of the Buduburam Refugee Community School, 28 April 2010.
- ⁷⁷ Email from Koryan Korklison, principal of the Buduburam Refugee Community School, 28 April 2010.
- ⁷⁸ Email from staff from a gender-based organization working on the Buduburam camp to The Advocates for Human Rights, 7 April 2012.
- ⁷⁹ *Ibid.*