Independent Programme Evaluation (IPE) of UNHCR’s Response to the refugee influx in Lebanon and Jordan

FINAL REPORT
Independent Programme Evaluation (IPE)
of UNHCR’s Response to the Refugee Influx in Lebanon and Jordan

Beyond Humanitarian Assistance?
UNHCR and the Response to Syrian Refugees in Jordan and Lebanon,
January 2013 – April 2014

Final Report

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Beyond Humanitarian Assistance?
UNHCR and the Response to Syrian Refugees in Jordan and Lebanon
Draft Report

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<tr>
<td>ACAPS</td>
<td>The Assessment Capacities Project</td>
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<tr>
<td>ACTED</td>
<td>Agence d’Aide à la Coopération Technique Et au Développement</td>
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<tr>
<td>CAR</td>
<td>Central African Republic</td>
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<td>CBO</td>
<td>Community Based Organisation</td>
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<td>CSP</td>
<td>Community Support Projects</td>
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<td>CWG</td>
<td>Cash Working Group</td>
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<td>DAC</td>
<td>Development Assistance Committee</td>
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<td>DRC</td>
<td>Democratic Republic of Congo</td>
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<td>ECC</td>
<td>Exceptional Care Committee</td>
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<td>ECTS</td>
<td>European credit transfer and accumulation system</td>
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<td>ECHO</td>
<td>European Commission Humanitarian Aid &amp; Civil Protection</td>
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<td>EU</td>
<td>European Union</td>
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<tr>
<td>EQ</td>
<td>Evaluation Questions</td>
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<tr>
<td>GoJ</td>
<td>Government of Jordan</td>
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<td>GoL</td>
<td>Government of Lebanon</td>
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<tr>
<td>GSO</td>
<td>Humanitarian Coordinator</td>
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<td>HC</td>
<td>Humanitarian Coordinator</td>
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<td>HCT</td>
<td>Humanitarian Country Team</td>
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<tr>
<td>HIS</td>
<td>Health Information System</td>
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<tr>
<td>HMO</td>
<td>Health Maintenance Organization</td>
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<tr>
<td>HQ</td>
<td>Headquarters</td>
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<td>IASC</td>
<td>Inter-Agency Standing Committee</td>
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<td>ICRC</td>
<td>International Committee of the Red Cross</td>
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<tr>
<td>IDP</td>
<td>Internally Displaced Person</td>
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<tr>
<td>ILO</td>
<td>International Labour Organization</td>
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<tr>
<td>IOM</td>
<td>International Organization for Migration</td>
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<td>INGO</td>
<td>International Non-governmental Organization</td>
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<tr>
<td>IPSAS</td>
<td>International Public Sector Accounting Standards</td>
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<tr>
<td>IP</td>
<td>Implementing Partner</td>
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<tr>
<td>IRC</td>
<td>International Rescue Committee</td>
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<td>ITS</td>
<td>Informal tented Settlements</td>
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<tr>
<td>JD</td>
<td>Jordanian Dinar</td>
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<tr>
<td>JHAS</td>
<td>Jordanian Health Aid Society</td>
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<tr>
<td>LGBTI</td>
<td>Lesbian, Gay, Bisexual, Transgender, Intersexual</td>
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<tr>
<td>MEHE</td>
<td>Ministry of Education and Higher Education</td>
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<td>MENA</td>
<td>Middle East and North Africa</td>
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<td>MDTF</td>
<td>Multi-Donor Trust Fund</td>
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<td>MoI</td>
<td>Ministry of Interior</td>
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<td>MoH</td>
<td>Ministry of Health</td>
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<td>MoE</td>
<td>Ministry of Education</td>
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<td>MoPIC</td>
<td>Ministry of Planning and International Cooperation</td>
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<td>MoSA</td>
<td>Ministry of Social Affairs</td>
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<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
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<td>NCD</td>
<td>Non-communicable Diseases</td>
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<td>NFI</td>
<td>Non-food Items</td>
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<td>NPTP</td>
<td>National Poverty Targeting Programme</td>
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<td>OCHA</td>
<td>Office for the Coordination of Humanitarian Affairs</td>
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<td>OECD</td>
<td>Organization for Economic Cooperation and Development</td>
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<td>PAB</td>
<td>Pre-assistance Baseline Monitoring</td>
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<td>PDM</td>
<td>Post-distribution Monitoring</td>
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<td>PRS</td>
<td>Palestinian Refugees from Syria</td>
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<td>RBSA</td>
<td>Regular Budget Supplementary Account</td>
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<td>Res Rep</td>
<td>Resident Representative</td>
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<td>ROV</td>
<td>Refugee Outreach Volunteer</td>
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<td>RRP</td>
<td>Regional Response Plan</td>
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<td>RSD</td>
<td>Refugee Status Determination</td>
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<td>SGBV</td>
<td>Sexual and Gender-Based Violence</td>
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<td>SHARP</td>
<td>Syria Humanitarian Assistance Response Plan</td>
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<td>SNAP</td>
<td>Syria Needs Analysis Project</td>
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<td>SOP</td>
<td>Standard Operating Procedures</td>
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<td>SPBF</td>
<td>State and Peace Building Fund</td>
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<td>SRAD</td>
<td>Syrian Refugee Affairs Directorate</td>
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<td>SRCD</td>
<td>Syrian Refugee Camps Department</td>
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<tr>
<td>TB</td>
<td>Tuberculosis</td>
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<tr>
<td>UN</td>
<td>United Nations</td>
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<td>UNHCR</td>
<td>United Nations High Commissioner for Refugees</td>
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<td>UNFPA</td>
<td>United Nations Population Fund</td>
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<tr>
<td>UNRWA</td>
<td>United Nations Relief and Works Agency</td>
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<td>UNDP</td>
<td>United Nations Development Programme</td>
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<tr>
<td>UNOPS</td>
<td>United Nations Office for Project Services</td>
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<tr>
<td>VASYR</td>
<td>Vulnerability Assessment of Syrian Refugees</td>
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<tr>
<td>WASH</td>
<td>Water, Sanitation and Hygiene</td>
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<td>WFP</td>
<td>World Food Programme</td>
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<td>WHO</td>
<td>World Health Organization</td>
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1 Summary

The sheer pace, scale, and complexity of the Syrian refugee crisis is unprecedented and shows little chance of improvement in the near future. UNHCR has taken on a challenging role as the organisation responsible for serving the nearly 3 million refugees spread across Egypt, Iraq, Jordan, Lebanon, Turkey, and beyond. The organisation manages the primary appeal for funding of all relevant partners, including the call for US$4.2 billion in the sixth Syria Regional Response Plan for 2014 (RRP6). It coordinates over 100 international and local partners in twelve sectors. Its Country Offices in Amman and Beirut have grown rapidly and are decentralising operations to various sub-offices. UNHCR’s High Commissioner and UNHCR’s Country Representative are in regular bilateral contact with the highest echelons of Lebanon’s government and the Royal Court and Government in Jordan. This complexity, while necessary, presents challenges that should now be addressed.

As the Syrian crisis enters its fourth year, the protection and assistance needs of refugees entail longer-term requirements, like healthcare, education, and livelihood strategies, amongst others. In the early stages of the crisis, Jordan agreed to open social services, including education and health, to incoming refugees. These services are strained and, as a result, Jordan’s economic development has been rendered more challenging. While Jordan has issued a National Resilience Plan to address some of these issues it is not clear how it will be funded. In Lebanon, where Syrian refugees now constitute over a quarter of the population, there has been substantial strain on education and other available services and price inflation in key areas, like housing. Lebanon’s history does not bode well for the influx of refugees and there is little doubt that the economic, demographic and security impacts of the Syrian crisis are highly destabilizing for this small country that has experienced years of conflict in its recent past.

In this context, UNHCR has performed well. It has developed and promoted the largest humanitarian appeal in history while simultaneously enhancing the technological and business processes associated with registering huge inflows of refugees. UNHCR has collected and organised vast amounts of data on the refugees and their social, economic, and developmental needs. UNHCR provides an array of relief measures, from cash and essential non-material items to supporting a private third-party administrator for health care in Lebanon, to an innovative, if somewhat problematic, participatory urban vision for the Za’atari refugee camp in Jordan, to many other innovations and practices that serve the refugees well and that may be models for other responses. Through these and other activities, UNHCR has gained the (sometimes grudging) respect of its peers and colleagues in UN sister organisations and international and local NGOs.

Yet, UNHCR risks becoming a victim of its own success. Although it has risen to the challenge of providing assistance to refugees, it has done so without a fully functional and integrated regional- or country-level strategy designed to guide all facets of its operations regardless of the complexity or scale of the response. The lack of such a strategy leads to being more reactive and trying to do everything instead of prioritising and linking different actors given their competencies. This, as many respondents described, has led to UNHCR being spread “too thin.”

One of the most critical consequences of this, as described in this Evaluation, may be the increasing number of protection issues in Jordan. There are other issues that contribute to being “spread too thin” in

---

1 This is recognized as a fairly contentious approach and one that has not been accepted by the Jordanian authorities.
2 While the Regional Response Plan (RRP) serves a strategic purpose, the fact that it appeals for funding and lacks medium-term strategic planning—scenario, risk, resource allocation, continuous improvement, efficiency and cost effectiveness—and other tenants common to a strategy, it looks insufficient in this regard. Because of this, it is positioned more as a resource mobilization document than a strategy that can guide operations at every level and provide guidance for decision-making and prioritisation. This is explored throughout this Evaluation.
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Lebanon, the situation is highly volatile if not explosive and there does not seem to be a unifying longer-term strategic plan in place. The recent political-military developments and the shrinking protection space are a reminder of how critical UNHCR protection work is and of the enormous efforts it requires with respect to issues which are at the very core of UNHCR’s mandate.

UNHCR has developed ways of working with host governments that now signal the longer-term consequences of such choices. This is apparent in how it has developed a near exclusive bi-lateral relationship with the Government of Jordan. This may have made sense early in the response but is now questionable given the increasing protection issues in Jordan. This increase coincides with a near closure of the border to incoming refugees. Various well-informed respondents call for a broader strategy, one that uses different and well-placed stakeholders to advocate on behalf of the refugees with the Government of Jordan. While UNHCR should be lauded for the relationship it has built to date it cannot let the safeguarding of that relationship impede the need to advocate and lobby on behalf of the refugees.

Finally, UNHCR country offices in Jordan and Lebanon lack fundamental tools and approaches for effective financial management, i.e. using monthly cash flow analysis to monitor, manage, and continuously improve operational performance. ³

These and other issues point to a pattern of being reactive rather than strategic. A quick-response is necessary to save lives yet it can also become the modus operandi of an operation. This is a prolonged crisis. The refugees’ needs are unlikely to decrease in the foreseeable future. UNHCR needs to develop a strategy that links with the Governments in Lebanon and Jordan, further facilitates the entry of other assistance and development actors (while maintaining UNHCR’s focus on refugees), and that seeks every opportunity for continuous improvement, efficiency, and cost effectiveness. It needs to do this given the common funding constraints that plague protracted humanitarian crises. It needs to do so given the complexities of Lebanon and Jordan’s status as middle-income countries, countries that are not typically prioritised for development funding and where the cost of delivering aid and other services is high. And, UNHCR needs to do all of this while maintaining a paramount focus on protection and assistance. This is high charge and this is why, as pointed out throughout this Evaluation, UNHCR must increase its focus, its use of strategy, its prioritisation, all while seeking every opportunity for other competent actors to take the lead.

There are few comparable examples of where UNHCR, or any other humanitarian actor, has made a smooth transition from emergency relief to direct government involvement and development. Yet, the scale and complexity of the crisis, the socio-economic conditions in Jordan and Lebanon, and the need for in-depth development approaches related to the impact of the refugees in each country—even though they differ greatly between Jordan and Lebanon—demand a new approach. In Jordan, UNHCR could leverage its success and leadership to ensure that the shift to resilience and development is effective. This should not entail a burgeoning of activities and scope but rather a much stronger focus. Lebanon’s confessional politics and complex governance arrangements make strategy formulation and the design of longer-term programmes for Syrian refugees challenging. At the time of the Evaluation, there was no clear resilience or development plan in place and UNHCR has filled gaps in meeting the needs of refugees and

³ Cash flow is an accounting term of art that refers to the actual way cash moves in and out of any project. It looks at what cash is available at any one time and how that cash availability changes over time. Given that cash is associated with many processes, projects, and activities, it is a primary managerial mechanism for tracking and evaluating performance. This is separate from the actual receipt of cash, or the materialisation of donor commitments, that can be highly unpredictable.
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host communities. In either case, UNHCR needs to develop a comprehensive 2 - 3 year strategy that is separate from the appeal process and engages relevant actors in both countries and beyond.

In this regard, this Evaluation’s findings, conclusions and recommendations are not simple or easy to address. They call upon UNHCR to develop a level of strategic thinking and planning that, while uncommon in many international public sector organisations, benefits from over 50 years of academic research and practice. None of the strategic planning approaches that UNHCR may consider are new. There are a range of techniques and models that can be used in complex, humanitarian crises. In addition to strategy, the Evaluation calls upon UNHCR to move away from the budget-based financial management—again common in public sector organisations but out-dated elsewhere—and towards reflective, adaptive and strategic financial management to ensure that money is used for what works best. It calls upon UNHCR to hone and strengthen its coordination skills, ensuring a balance between directive and consultative approaches, while committing all to a strict focus on short- and medium-term strategic objectives. It calls upon all of these in direct relation to UNHCR’s responsibility to ensure refugees’ protection and assistance needs, amongst issues directly related to the refugees who so desperately need UNHCR’s help.

These do not fit tidily into clearly actionable recommendations. This approach requires organisation-wide changes, in some cases, and a shift in the way people conceive of their roles and responsibilities in a humanitarian organisation. The response demands it. The refugees demand it. The international community that looks to UNHCR’s leadership on behalf of refugees demands it. If not now, when?

2 Findings & Conclusions

Overall

After two years of humanitarian response to the Syrian refugee crisis in both Jordan and Lebanon, the situation has reached a critical phase. Humanitarian assistance is overstretched and on the decline, but at the same time there are no substantial indications of alternative sources of funding from development budgets. The situation in Lebanon, the country most impacted by the refugee influx, is particularly difficult for the reasons already referred to. UNHCR has made considerable efforts to engage development actors but progress has been less than hoped for. Refugee vulnerability is increasing, humanitarian assistance and the resource intensive operation that has been established are not sustainable at the same level, and there are no firm indications of sufficient alternative support. With the situation now at a critical juncture, UNHCR will require a new approach and strategy. The aid community will need to make hard choices and prioritise. UNHCR and its partners may likely need to anticipate a decline in resources and organise themselves in a more integrated way to deliver assistance focused on key sectors and the most critical needs/vulnerable populations.

Links with Development: The Evaluation found that despite considerable efforts there has been limited progress towards securing development financing. UNHCR has recognised that the involvement of development actors, financial institutions, donor states and the private sector is crucial. In Lebanon it has played a key role in all efforts that have been undertaken in this respect. It has highlighted the scale of local needs, including social cohesion, and attempted to

4 The 3RP (2015-2016), a two-year plan replacing the RRP, integrates and is aligned with existing national plans, including the Lebanon Crisis Response Plan (LCPR) launched in December 2014. The LCPR is a joint GoL–UN plan to ensure that the response to the Syria crisis tangibly benefits Lebanon and helps to stabilize the country. The plan outlines the priorities of the Government and the international community for the coming two years to respond to the crisis in Lebanon.
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rally development actors to meet them. Some key donors have opted to channel transition and development funding in this context through UNHCR. However, many political and structural obstacles remain to be resolved if development financing is to be mobilised. So despite UNHCR’s efforts, the expected results have yet to materialise as had been hoped for.

Jordan
UNHCR’s response to the Syrian refugees in Jordan is complex. It has grappled with an unprecedented escalation of the crisis, only to reach something of a pause as Jordan decreases the flow of refugees into its territory and starts addressing the longer-term consequences of the crisis on its social and economic development.

In nearly every sector, UNHCR has devoted resources, energies, and talent to meeting the immediate needs of over 600,000 refugees in Jordan. It has also made decisions that, in late 2012 and early 2013, facilitated Jordan’s generosity and commitment to easing the refugees’ plight. These decisions include the overall bilateral strategy with the Government of Jordan (GoJ), using the Za’atari Refugee Camp (Za’atari) as a catalyst for global media attention, the broadening of the Regional Response Plan to encompass nearly all aspects of refugees’ lives and wellbeing, the rapid deployment of talented UNHCR staff to the region, coupled with an organisational growth strategy that replicated structures and systems capable of securing resources on the ground quickly.

These decisions now pose challenges.
UNHCR needs to develop a new strategy with the GoJ that more effectively addresses increasing protection issues. UNHCR needs to directly address the urban experiment that Za’atari represents and ensure that the GoJ is involved as the ultimate administrative authority. UNHCR needs to shift focus to the 80% of refugees who live outside the camps and who face protection and assistance problems. UNHCR needs to leverage its information and data to support how other international organisations work with Jordan as it implements a National Resilience Plan. UNHCR needs to facilitate how other actors work with Jordan as part of its coordination role so that UNHCR can focus more on refugees’ protection and assistance needs. UNHCR can and should facilitate other actors who have relevant development objectives, despite the factors that may impede their progress, like the uncertainty of forthcoming development funding. It should facilitate, get things moving, and then pull back so that it can focus on the protection and assistance needs of refugees. UNHCR doesn’t need to keep a place at the table as things shift toward resilience and development.

This issue of focus concerns other areas as well. UNHCR needs to focus on efficiency and cost effectiveness to ensure that every cent is spent wisely and that there is continuous improvement and learning incorporated into all of the response’s operations.

The following provides a brief conclusion for the primary UNHCR mandate areas and evaluation levels under consideration. The colour rankings are indicative of the findings, analysis, and conclusions as presented throughout this Evaluation. The Evaluation recognises that the pace, scale and complexity of the response implies that there will be issues, problems and mistakes. This is understandable. What the Evaluation seeks to do is to highlight key areas that are within UNHCR’s mandate, its coordination role, and over which it has a fair degree of authority and control. Reasonable people may disagree and yet one of the purposes of the Evaluation is to highlight both successes and challenges and to thus prompt additional consideration and action.

**Protection:** Notwithstanding the extent of the protection work led by UNHCR to date, and the recognition of the importance of national security for both local citizens and refugees, there are serious and growing protection issues in Jordan. This includes tight border controls that refuse
entry to the majority of people seeking access to Jordanian soil, inadequate access, tracking, and analysis of protection issues in non-camp settings, inadequate input and monitoring of protection issues at the border, including the treatment of those injured in the conflict, rising instances of deportation, refoulement, and the refusal of selected family members, thus splitting families at points of entry.

**Assistance:** The immediate assistance needs of refugees are met, albeit less so in non-camp settings. The improvements and innovations regarding registration, knowledge management (online portals) as well as inter-agency and sector-based coordination (see below) all contribute to meeting the refugees’ needs. The Za’atari Camp uses a compelling refugee-centric participatory approach to camp management that hinges on an urban development approach. This may very well become a new aid modality for camps (if supported effectively going forward). The latter fall within the purview of the Government of Jordan, which has administrative authority over the camps.

**Coordination:** Evidence indicates that inter-agency and sector-level coordination is effective and has continuously improved during the response, despite myriad (albeit limited) complaints from stakeholders. Effective coordination at these levels has been facilitated by UNHCR’s leadership and key personnel and in how technology, like online platforms, has been leveraged to support knowledge-sharing and decision-making. The belated agreement between OCHA and UNHCR—and the lingering tensions associated with coordination roles and responsibilities for refugees in an L3 emergency—nevertheless create frustrations and sap limited resources in ways that could have a lasting impact.

**Effectiveness:** Overall, UNHCR has been effective in how it has met refugees’ assistance needs. It has deployed resources and people quickly and addressed needs despite a highly complex and quickly changing context. These are highlighted in “Assistance” above. It has also done this in ways that have leveraged on-line information portals, inter-sector working groups, and the diversity of actors in the response. UNHCR has furthermore demonstrated a capacity to learn from mistakes quickly, to adapt and respond and actually use such incidents as opportunities to improve upon existing systems and processes. While all of this could be improved through more detailed and comprehensive strategic thinking and planning, UNHCR’s response has been highly effective.

**Efficiency:** At one level, this could be ranked “red” given the dearth of financial management that moves away from budgetary spending and allocations to using money to analyse what is working and what is not, and how to use money to achieve the greatest impact. Yet, this requires a significant shift within UNHCR, which goes beyond its response in Jordan. Comparatively, UNHCR Jordan has identified various ways to save money, especially in the registration system. While somewhat ad-hoc, significant savings look likely, and so their merit should not be diminished. While not part of this Evaluation’s scope, there were no indications of vast waste or blatant inefficiencies, although this needs to be established based on thorough analysis and scrutiny, as recommended. The Evaluation also holds that this level of financial management, of using cash flows, ratios, and other tools to monitor, manage and continuously improve performance is quite separate from the actual receipt of funding from donors. That is also highly complex yet different. This assessment calls upon managers to use the cash they have as a vital performance tool. While commonplace in other contexts, it is time that it become commonplace in humanitarian operations.
Lebanon

For UNHCR, whose primary purpose is to safeguard the rights and wellbeing of refugees, Lebanon is a priority. Lebanon hosts more Syrian refugees than any other country. It has become the country with the highest per capita concentration of refugees worldwide. The pace and scale of the influx of Syrian refugees during the period under evaluation were momentous. UNHCR managed to effectively prioritise and scale-up and response in Lebanon.

The challenges for coordinating the response were made more complex by the political environment and the consequent lack of coherent institutional arrangements. Notwithstanding these constraints, UNHCR delivered strongly on its refugee protection mandate and has overseen an effective assistance programme. Critical dilemmas have however emerged for the future strategy and organisation of the response. The continued high level of support required for humanitarian assistance is doubtful and as yet there are no clear indications of substantial longer term financing or programmes.

Despite calls from UNHCR and the international community to increase support to Lebanon, funding received is receding while. Insufficient and reduced funding and the increasingly protracted nature of the crisis are having an impact on the viability of the current response model and UNHCR’s ability to meet existing needs. A dilemma arises as critically needed assistance is being reconsidered and scaled back at a time when the needs and vulnerability levels of both refugees and the Lebanese population are on the rise. A shift in the response design is expected in light of reduced funding. Continued and further course direction is sought for programming not to be simply resource-driven and coverage tailored to funding constraints. The Lebanese government is increasingly requiring that a share of the response target vulnerable Lebanese communities. UNHCR needs to continue to exercise leadership and further proactively clarify how the response will be prioritised and evolve and ensure unity and consensus on this stance.

The following provides a brief conclusion for each UNHCR mandate area. The colour rankings are indicative of the findings, analysis, and conclusions as presented throughout this Evaluation. The Evaluation fully recognises that the pace, scale and complexity of the response implies that there will be countless issues, problems and mistakes. This is understandable. What the Evaluation seeks to do is to focus on key areas that are within UNHCR’s mandate, its coordination role, and over which it has a fair degree of authority and control. Reasonable people may disagree and yet one of the purposes of the Evaluation is to highlight both success and challenges and to thus prompt additional consideration and action.

Protection: UNHCR has performed extremely well in Lebanon given the complexity and challenges posed by the context. It has effectively prioritized protection in Lebanon, in line with its mandate. Strong and effective mechanisms for registration have been put in place under incredibly difficult circumstances. These and the anticipated outreach are the backbone of UNHCR’s operation and especially important to ensure that refugees have access to both a basic level of protection and services. There is a risk that registration information will increasingly be unreliable, with the increased targeting of assistance and exclusion. Already UNHCR has noted the increase in the number of female-headed households now in the reregistration efforts, which is believed to be prompted by the fear of losing assistance.

Effectiveness: Overall UNHCR’s response to the influx of refugees in Lebanon has been effective and is considered successful. UNHCR was able to prioritise its Lebanon operation and scale-up

5 ACAPS Syria Needs Analysis Project (SNAP) Scenarios, Where is Lebanon heading now?, 22 August 2014
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its capacity and response. UNHCR has been especially effective achieving its primary objective in Lebanon: access to territory and respect of refugee rights. UNHCR’s advocacy efforts have enabled it to achieve improvements in terms of refugee rights protection, in a difficult context with few applicable legal precedents. Progress is being made on community participation and reaching out to the most vulnerable in a context in which the refugees are so dispersed with the Refugee Outreach Volunteer (ROV) network that is being rapidly expanded. ROVs disseminate information in the community about services, assist in the identification and prioritisation of protection cases and are a vital link between the refugees, the host communities and the humanitarian organizations.

**Assistance:** Overall, the basic assistance needs of refugees have been met. Coverage and standards, however, are declining in the light of the challenges posed by the context in Lebanon. The response in certain sectors has lacked planning and longer-term strategic thinking. Decisions made early-on have, at times, had longer-term consequences in terms of missed opportunities for better and more consistent coverage of needs. Shelter options and accommodation assistance—which are a main immediate priority need for all refugees—are vastly insufficient. Multi-sector cash assistance is seen as a preferred modality in Lebanon. Its consequences on the shelter sector and the overall benefit that refugees derive from this assistance have to be better monitored. The coverage in Education both in terms of quantity and quality is considered poor. The scarcity of funding will require progressively greater prioritisation and targeting of assistance, greater focus and for UNHCR to devolve responsibility in certain sectors/areas.

**Coordination:** Evidence indicates that the current coordination model is largely effective particularly in light of the complex operating environment. It has continuously improved during the response, and this is fully recognised by stakeholders. Decentralisation has presented UNHCR with both opportunities and challenges that require further streamlining of the coordination model. Effective coordination at all levels has been facilitated by UNHCR’s leadership and key personnel as well as in the way technology, like the online platforms, has been leveraged to support knowledge sharing and decision-making. The overall UN coordination architecture in-country should be rationalised so as to facilitate consensus and unified leadership with respect to the strategic priorities of the response.

3 **Recommendations**

The evaluation recommends overall that the respective roles of RC/HCs, UNCTs, HCTs in relation to UNHCR’s coordination mandate be clarified with a view to improving the effectiveness of the response in L3 level refugee emergencies.

The recommendations below are taken from different parts of the main report, as indicated. They are further elaborated and explained in the report sections noted and in the “Recommendations” section for both Jordan and Lebanon. Each recommendation includes a reference to the section from which it is derived.

3.1 **Recommendations for the Jordan Response**

**Strategy & Objectives**

1. UNHCR should develop a strategy to transition funding and activities that can be addressed effectively by the Government and other actors and that are more in line with the Government’s National Resilience Plan. This should allow UNHCR to better focus on refugees’ protection and assistance needs. (Recommendation 5; Section 6.3.7.)
2. Refine objectives for RRP7 or any successor programme to ensure that they are specific, measurable and achievable, and that they are sufficiently aligned with the GoJ National Resilience Plan while ensuring that refugees’ protection and assistance needs are addressed. With these strategic objectives in place, all sector level objectives should be clearly supportive of these broader objectives. (Recommendation 4; Section 6.3.6.)

3. UNHCR should build on the relationship it has developed with the World Bank by devising standard metrics, database structures, and business processes for the collection and analysis of economic data. This would establish data-rich analytical links between UNHCR’s humanitarian response and shifts towards resilience and development. (Recommendation 6; Section 6.4.2.)

Protection

4. Address increasing protection issues. This should include a specific strategy that may include efforts to increase and adapt the engagement of other partners, including other UN organizations, NGOs, and governments, and continued consultation with the Government of Jordan. This should be measured by a direct decrease in the number of reported protection issues, thus reversing the current trend. (Recommendation 1; Section 6.1.8.)

5. Monitor access to the territory and incidents of deportation in a systematic way to adopt a strategic approach in advocacy while increasing outreach to those seeking refuge. While UNHCR has increased its efforts to be present at the borders and in outreach on both sides, without direct oversight and third-party monitoring the size of the problem remains relatively unknown. Also, it is unclear whether those seeking refuge are aware of the different forms of recourse. This implies a much more coordinated information system between regional actors. (Recommendation 2; Section 6.1.8.)

6. Information about restrictions of movement for women and girls, for fear of harassment and physical attacks must be dealt with more consistently and perhaps separately from SGBV. While most efforts for SGBV protection are proving effective, there remain gaps in non-camp settings. (Recommendation 3; Section 6.1.8.)

Coordination

7. UNHCR could increase not only the value but also the effectiveness of its leadership role through more detailed performance appraisals of funded partners. This can become a useful tool for all coordination activities and towards more focused results. This could include greater due diligence on existing competencies, gaps, and historical performance with benchmarks and key performance indicators for their work under the RRP. Conducting performance appraisals would ensure better performance and increase UNHCR’s value overall. (Recommendation 13; Section 6.9.5.)

Health

8. WHO and other relevant actors should involve MoH in addressing access to health services and referrals for Syrian refugees as well as establish quality standards. This would be the best solution for the referral problems encountered. (Recommendation 8; Section 6.5.8.)

Efficiency

9. Conduct a staffing/performance audit designed to pinpoint possible gaps (probably at the sub-office level) and redundancies (possibly at the Country Office level). While difficult to ascertain in this Evaluation, the staffing of Country Office posts has been somewhat erratic: it is not clear whether the staffing balance is now correct or bloated. Any staffing review should include regular staff, international staff, consultants and other short-term contracts, including UNOPS contracts, and any and all other relevant staff. (Recommendation 9; Section 6.9.2.)
10. **Conduct a business process efficiency review.** The response has included the development of several business processes, standard operating procedures, and other operational activities that may or may not be wholly efficient. This review should be designed to decrease costs (indirect and direct) related to these processes without sacrificing quality. (Recommendation 10; Section 6.9.2.)

11. **Review/revise terms with all commercial suppliers.** Ensure that terms include key performance targets and expected cost efficiencies over time, e.g. a 5% decrease after 12 months. This is standard practice. (Recommendation 11; Section 6.9.2.)

12. **Review other significant cost centres**, e.g. fleet management, and ensure that there are adequate cost-effectiveness measures in place. (Recommendation 12; Section 6.9.2.)

**Other**

13. **In coordination with the GoJ, develop a strategy for Za’atari that considers current activities and the “vision” put forward by the Head of the UNHCR Sub-Office.** UNHCR is quite aware that any such vision cannot exist in a vacuum. It is within the purview of the GoJ to decide the camp’s current and eventual administrative status. (Recommendation 7; Section 6.5.3.)

14. **Develop a section of the Inter-Agency Information Portal to collect, organize and disseminate refugee feedback.** This would allow for the aggregation of results into a periodic report that could be used for sector analysis and decision-making. (Recommendation 14; Section 6.10.4.)
3.2 Recommendations for the Lebanon Response

Objectives & Strategy

1. Clarify focus, priorities and consequences. There will be a need for the international community to support UNHCR’s leadership in Lebanon. Beyond the RRP or revised appeal framework (3RP), the evaluation recommends that UNHCR clarify its own strategic priorities and its focus in worst-case funding scenarios, including the adverse effects and risks of this focus on the excluded population and sectors, and in terms of exacerbating tensions, potentially limiting or affecting future refugee access, etc. (Recommendation 5; Section 7.3.)

2. Continue to devolve responsibility. While difficult or uncertain, UNHCR should progressively reassign responsibility for certain sectors to other actors/UN agencies and monitor their take-up of these. A sector-by-sector, activity-by-activity specific strategy should be developed where UNHCR retains a clear inter-sector inter-agency coordination lead role. In the case of Lebanon, this recommendation does not apply to the health sector given UNHCR’s coordination capacity at the Beirut level, the importance of UNHCR’s health programme and WHO’s role and capacity in the country. (Recommendation 6; Section 7.3.)

3. UNHCR should persist in its efforts to encourage the Lebanese government to create a functional Task Force on Syrian Refugees. Ideally, this would be an office at the Ministry of State in the light of the problems plaguing the Higher Relief Council (the Council’s Chair was imprisoned for corruption and the Council has not been involved in dealing with the Syrian crisis since). (Recommendation 21; Section 7.9.)

4. While a great deal of work is being done, a more comprehensive and detailed strategy should be developed for social cohesion in Lebanon. Various initiatives have been launched and will surely have an impact. However, they are not coordinated effectively nor are their targets and expected results sufficiently harmonised to ensure appropriate coverage and positive impact. This social cohesion strategy should account for the complexities associated with different contexts/locations and the varying ways in which local and national government entities can be engaged. This should include refined indicators and monitoring systems to ensure that mid-term adjustments can be made. This is particularly important given the potential conflicts that could emerge between refugees and host communities. As social cohesion remains an important protection objective it should be established jointly by UNDP and UNHCR. (Recommendation 4; Section 7.1.7)

Protection

5. UNHCR should increase efforts with all field staff to promote protection as integral to all UNHCR activities through follow-up, on-the-job training and appropriate feedback. This should contribute to strengthening the understanding that, while not everyone is competent to manage protection cases, everyone should, as a minimum, be sensible to the possible protection impact of their actions and remain vigilant to identify and refer protection concerns/cases wherever they emerge. (Recommendation 1; Section 7.1.1.)

6. Develop a common, countrywide communication strategy for protection that includes both the dissemination of relevant information and structured, consistent and widespread communication about protection with refugees and community leaders. (Recommendation 2; Section 7.1.4.)

7. Ensure that child protection activities address the most vulnerable and difficult cases and that there is a sufficient balance between these and other cases. Ensure that donors are informed about the need for a balanced approach. This should include an in-depth analysis of children’s vulnerabilities
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and the consideration of alternative, and possibly more effective, approaches to their needs. (Recommendation 3; Section 7.1.6)

Coordination

8. In contexts such as Lebanon with refugee crises and level 3 emergencies, in the aim of improving the effectiveness of the response, the respective roles of HCs, HCTs and UNCTs should be clear to avoid possible duplication. The 24 April 2014 Agreement between the ERC and the High Commissioner has not provided sufficient clarity on these roles in Lebanon when there is a refugee response coordination model in a protracted crisis, and an HC, HCT and UNCT are in place, or with regard to transition modalities when situations are volatile but clusters are not in place. (Recommendation 7; Section 7.3.)

9. The RRP should be a strategic and programmatic tool that offers a much clearer vision of what is to be achieved and how. The process should aim to be more straightforward and lighter at this stage of the response. The fact that activities are largely left to the initiative of the partners and defined a posteriori has the advantage of encouraging participation and ownership but proves problematic because it hinders meaningful programming. (Recommendation 8; Section 7.3.7.)

Shelter

10. UNHCR is encouraged to continue its advocacy with the GOL to endorse the emergency shelter strategies developed”. This should include relocation sites for refugees affected by adverse weather or armed conflict. This plan would require GoL permission and coordination. (Recommendation 9; Section 7.5.1.)

WASH

11. Conduct a more comprehensive and detailed assessment of WASH needs in informal settlements. Use results to develop overall strategy for the informal settlements. (Recommendation 10; Section 7.5.2)

Cash

12. Improve UNHCR’s cash programme through four inter-connected measures: i) a unified mechanism to identify the vulnerable; ii) guichet unique; iii) the harmonisation of cash programmes; and iv) one partner per location. (Recommendation 11; Section 7.5.4.)

Health

13. A joint health strategy between MoH and UNHCR and other partners should be envisaged and needs to widen the scope to include development partners. (Recommendation 12; Section 7.5.6.)

14. UNHCR needs to refocus programmatically and strategically on primary healthcare. Issues of access should be addressed to facilitate a frequentation according to standards. In addition, means to better

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6 Partners working in cash, whether with UNHCR or other funds, have more recently agreed to follow a unified approach agree a common architecture for cash assistance. This comprises agreement on the most vulnerable group to be prioritised for cash assistance, an agreed targeting methodology, an agreed monthly transfer value. According to UNHCR, the household assessment tool that will be used will be scored to indicate eligibility for both food and cash, and WFP and UNHCR have defined geographic divisions for covering with household assessments. Each geographic area will have one partner to carry out the household visits. The guichet unique is still under discussion at the level of UNHCR and WFP headquarters, while at field level, systems are being harmonised.

7 The joint health strategy has been developed for 2015 (3RP) with WHO and partners. According to UNHCR and despite UNHCR and partner urgings, the participation of the MOPH has been limited in this process, but UNHCR and partners are working to find mechanisms to develop a network of actors to support MOPH plans.
understand the current informal system (local NGOs, Syrian underground) in a primary healthcare strategy need to be addressed. (Recommendation 13; Section 7.5.6.)

15. Given the scale of resources allocated and the number of beneficiaries reached, UNHCR should be more proactive in ensuring an adequate level of healthcare for refugees. Clear information on the package of services and ways to access them should be provided and monitored through community-based mechanisms. (Recommendation 14; Section 7.5.6.)

16. The Exceptional Care Committee (ECC) and the High Relief Commission should be provided with standard operating procedures and funds to address needs of refugees and Lebanese. Tertiary cases and complicated ones need to be channelled through new mechanisms, supported by donors and integrated in the host country. The ECC should be integrated with means to refer specific cases, through GoL involvement or other specific mechanisms funded by donors. (Recommendation 15; Section 7.5.6.)

17. Aspects of client satisfaction and negotiated rates should be more closely followed by UNHCR, establishing targets and mechanisms for the third party administration. There is a need for a shift to treating refugees as clients, instead of treating UNHCR as the client of Globe-Med. The limited possibility to register complaints other than those related to standard operating procedures turns managing complaints into an administrative activity related to Globe-Med functions, while the possibility of channelling useful refugee data and information to UNHCR is lost. (Recommendation 16; Section 7.5.6.)

18. The challenges in Lebanon require greater managerial capacities in the health sector than those that UNHCR has in place. Capacity should be redefined and the right profiles determined. UNHCR should strengthen its managerial and M&E expertise in the Health sector. In 2013, UNHCR established specific staff dedicated to health sector coordination which has proven very positive. (Recommendation 17; Section 7.5.6.)

19. If the situation becomes chronic, UNHCR may consider the creation of an adapted scheme for the coverage of refugee medical expenses (sick fund), anchored in pre-qualified service providers and financed though specific tools (e.g. trust funds). This would not spare the Third Party Administrator, but would offer some possible efficiency gains and a midterm solution for the situation in middle-income countries. Alternatively, donors should support the GoL in covering the costs of services provided to refugees and vulnerable Lebanese, which is difficult to put in place in a context of private service providers. Specific solutions to improve the situation of vulnerable Lebanese are urgently required in order to prevent the scaling up of tensions. (Recommendation 18; Section 7.5.6.)

Education

20. UNHCR could focus more on adopting a coordinating role in the Education sector rather than an implementing one. Essentially, UNHCR can play a facilitation role. The roles of each stakeholder should be reviewed and sanctioned if not executed within the agreed framework. A firm should be hired to handle the financial aspects of the framework, thus allowing NGO/UNHCR to concentrate on real education and quality issues. More face-to-face contacts between UNHCR and MEHE are necessary to clarify roles and activities. (Recommendation 19; Section 7.5.7.)

Social Cohesion

21. UNHCR should strengthen monitoring systems related to community outreach and social cohesion. Without this, community outreach risks various missed opportunities that can only be spotted when the complexities of a community are understood and the dynamics and changes monitored closely over time. (Recommendation 20; Section 7.6.)
22. UNHCR can take stock of the constraints posed by its internal procedures and regulations, and how these have affected its response in a large-scale operation such as Lebanon where it is very much in the lead, and the consequences of its systems and processes on the entire response. (Recommendation 22; Section 7.10.)

23. UNHCR should develop systems to better track earmarked funding from donors in the field that will help programme staff understand which financial resources are currently available. (Recommendation 23; Section 7.10.)
4 Evaluation Context

The unremitting pace and extraordinary scale of the Syrian crisis has created unprecedented challenges for the humanitarian community. The war in Syria, which has now entered its fourth year, has displaced close to 6.5 million people within the country and forced over 3 million Syrians to seek refuge abroad, primarily in the neighbouring countries of Lebanon, Jordan, Turkey and Iraq, and Egypt.

In accordance with its statute and mandate, UNHCR has led and coordinated the response to the influx of Syrians in need of protection and assistance in Lebanon and Jordan. Protection lies at the heart of the agency’s efforts and drives how UNHCR carries out its activities. UNHCR’s main purpose is to safeguard the rights and wellbeing of refugees. As a consequence of the magnitude of the Syrian crisis, The UN High Commissioner for Refugees noted that UNHCR and its partners have been ‘stretched to the limit’. Assistance programmes have grown, both in magnitude and complexity, and are fundamentally different from those introduced in UNHCR’s early existence.

UNHCR has commissioned an independent evaluation of the response to the influx of refugees from Syria in Jordan and Lebanon. This independent evaluation is taking place at a time when there is a realisation that the crisis and refugee situation will be protracted and when both the affordability and the related sustainability of the response, possibly even the on-going need for humanitarian assistance itself, are being questioned. One year after UNHCR’s recommendation, following a real-time evaluation of its Syrian refugee response operations, to scale up and improve the agency’s coverage of refugees and reinforce its presence and capacity at the point of delivery, the focus and challenge is to devise a longer-term strategy to cover evolving refugee needs over time.

5 Methodology

The methodology of this Evaluation is based on the collection and analysis of a broad range of evidence from multiple sources. These include evaluations, surveys and other data generated by UNHCR, its partners and others as part of the overall response to the Syrian crisis. The Evaluation also involved the collection of its own primary evidence, namely qualitative data from field phase interviews, a household survey among persons of concern, and a post-field phase online survey to confirm, qualify, and fill in any analytical gaps.

This combination of sources enables the Evaluation to corroborate results and move towards demonstrable attribution. Distinct contradictions are identified between datasets, although this was found to occur in very few instances. In most cases, the Evaluation provides multiple datasets to confirm findings. This includes the citation of other primary and secondary sources throughout. The entire analysis is weighted against expertise in the subject matter at hand and other insights gained throughout the Evaluation.

Scope

The general scope of this Evaluation covers the period from 1 January 2013 to 31 March 2014, even though the analysis concentrated on the second half of 2013, up to the date of this Report. This is appropriate given the rapidly-changing nature of both the crisis and the response: this way, the evaluators can be sure that the analysis and conclusions relate to issues of critical importance for UNHCR going forward.

Moreover, this Report focuses on major trends and issues rather than the minutiae of select activities and sectors, except where they relate to broader trends. This is critical since an Evaluation of this scope could

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8 General Assembly Resolution 428 (V) of 14 December 1950
9 Formal opening of the 64th annual session of UNHCR’s Executive Committee in Geneva, 1 October 2013.
http://www.unhcr.org/524ae6179.html
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not adequately address every single operational issue, nor should it strive to do so. These are amply addressed by UNHCR and its partners and in various reports, assessments and related documents.

Terminology
The Report uses terminology that will be familiar to the general reader. For instance, it uses the term “refugee” instead of “person of concern” throughout, with full knowledge of the legal distinction between the two.

OECD DAC
The Evaluation’s analysis and approach adheres to and meets the quality standards set out by the OECD DAC criteria for humanitarian evaluations. This includes standards for independence and quality assurance, as well the use of standard evaluation levels for organising evaluation questions and the sections of this Report.

Analytical Framework
The Evaluation is based on a comprehensive analytical framework based on the agreed evaluation questions. This includes target cohorts, data sources, methodologies, constraints/dependencies, and risks associated with each evaluation question.

This analytical framework was presented as part of the Inception Phase and is available as a separate Annex.

Best Practices & Leading Research
Evidence has consistently been assessed according to best practices and leading research. These are drawn upon to support claims and to buttress or contradict other sources. For instance, respondents may hold relatively uniform opinions on a subject that contradict established theories or best practices. In such cases, the contradiction is pointed out and appropriate conclusions are drawn.

In other cases, there may be no direct evidence from different cohorts regarding specific evaluation questions. In such instances, the Evaluation draws on established theories or leading articles. Some theories or practices can be widely-debated or contentious. In these cases, the Evaluators’ views are established through the citations chosen.

For other aspects of the Methodology, including relevant limitations and constraints, please see this Evaluation’s proposal. In addition to best practice, leading research and other comparative data, the following sources contributed to the findings and conclusions.

Field Phase: Qualitative Evidence
The field phase included the collection, organisation and analysis of qualitative data from all interviews. This data includes summaries of what interviewees said, using verbatim statements where particularly relevant. Qualitative data is ranked according to the rankings ‘positive’, ‘neutral’ and ‘negative’. Once the initial categorisation has been undertaken, the interviewer reviews this.

Interviews are categorised by cohort as follows:

<table>
<thead>
<tr>
<th>Cohort</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>UNHCR</td>
<td>All UNHCR Staff</td>
</tr>
<tr>
<td>UN</td>
<td>All other UN organisations, including the World Bank</td>
</tr>
</tbody>
</table>

---


11 “Best practice” and “leading research” refer to OECD DAC, UNEG, and the World Bank IEG along with other research. These are cited as appropriate throughout the findings section.
In Jordan, **154 interviews** were conducted (45 UNHCR; 34 UN; 36 INGOs; 18 NGOs; 14 Donors; 7 Other), for a total of **2,900 qualitative data points**.

In Lebanon, **164 interviews** were conducted (61 UNHCR; 103 from other organisations (UN, INGO, NGO, Private Sector, Donors, Government, Other), for a total of **1,519 qualitative data points**.

For a list of the persons that the evaluators met with in Jordan and Lebanon, please see the relevant Data & Analysis Reports.

Interviews used standard protocols, affording each interview the possibility of asking additional standardised questions relevant to the respondent. All questions are linked to specific Evaluation Questions (EQs) for this Evaluation.

**Qualitative evidence is inherently chaotic.** Where interviewees offer insights that are seemingly unrelated to the question, these are occasionally included and ranked according to the context and overall interview. Some data points are repeated when multiple respondents offer similar or identical statements and when these apply to different evaluation questions.

**From an analytical perspective, qualitative statements are also inherently varied.** Interviewees often provide characterisations, nuance and examples that do not fit easily into categories like “positive” or “negative.” As such, most comments are qualified as “neutral”. The analysis aims at identifying trends, e.g. whether responses trend towards positive or negative, rather than ascertaining a clear delineation between the two.

This is especially important since the information collected is not survey data. Given its qualitative nature, its representation in the Evaluation will not be as clear as in a typical quantitative survey. However, the analysis possible in such instances is far more powerful.

Qualitative data analysis graphs and word cloud graphs are included where relevant.

For more, please see the Data & Analysis Reports for Jordan and Lebanon, included as separate Annexes.

**Field Phase: Household Survey**

A household (HH) survey was conducted with **194 refugees in Jordan** and **308 in Lebanon**, usually the heads of households. This survey was designed to enhance existing survey data and conclusions, focusing on qualitative elements often difficult to ascertain through traditional surveys.

This survey constitutes a non-probability sample. Thus, conclusions about the refugees in general cannot be drawn from this analysis. Instead, this provides an independent dataset that can be compared with other existing datasets as well as those from the field mission, to determine whether it highlights congruence, inconsistencies or other issues that may warrant further investigation.

The results of these surveys for Jordan and Lebanon are contained in the relevant Data & Analysis Reports, included as Annexes to this Report.
Post-Field Phase Survey

A post-field phase survey was administered online, designed to address contradictions and gaps in existing data as well as to provide a supplementary data set for reference purposes. The survey included response rates from the following cohorts:

<table>
<thead>
<tr>
<th>Target</th>
<th>Target #</th>
<th>Actual #</th>
<th>% of Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lebanon</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UNHCR Lebanon</td>
<td>264</td>
<td>113</td>
<td>43%</td>
</tr>
<tr>
<td>UN</td>
<td>47</td>
<td>22</td>
<td>47%</td>
</tr>
<tr>
<td>INGOs</td>
<td>N/A</td>
<td>86</td>
<td></td>
</tr>
<tr>
<td>NGOs</td>
<td>N/A</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Donors</td>
<td>13</td>
<td>2</td>
<td>15%</td>
</tr>
<tr>
<td>Jordan</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UNHCR Jordan</td>
<td>420</td>
<td>80</td>
<td>19%</td>
</tr>
<tr>
<td>UN</td>
<td>13</td>
<td>4</td>
<td>31%</td>
</tr>
<tr>
<td>INGOs</td>
<td>N/A</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>NGOs</td>
<td>N/A</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Donors</td>
<td>6</td>
<td>1</td>
<td>17%</td>
</tr>
<tr>
<td>UNHCR HQ</td>
<td>35</td>
<td>9</td>
<td>26%</td>
</tr>
<tr>
<td>UNHCR MENA</td>
<td>35</td>
<td>21</td>
<td>60%</td>
</tr>
</tbody>
</table>

This reveals fair response rates for most cohorts, although those below 20-30% are inadequate overall by generally accepted standards.12 No standard deviation is calculated given the specific target cohort sizes, e.g. less than 50.

Low response rates are mitigated by the fact that this constitutes a comparative data set and is weighted less than qualitative and other data. The Evaluation also treats most results in total, combining all cohorts rather than disaggregating them. As such, this information is only used in comparison with other datasets.

Using Qualitative Data Graphs

This Report uses qualitative data graphs throughout. Qualitative data graphs demonstrate trends by categorising responses according to a set scale and organising them according to specific Evaluation Questions and cohorts. Qualitative data is inherently difficult to analyse but can provide strong evidence for trends in current perceptions.13

Each Qualitative Analysis Graph includes colour/grey scale coded and numbered boxes for each piece of qualitative data. Thus, if there were 35 responses, as in the example below, there will be 35 corresponding boxes, with box “1” corresponding to statement “1,” box “2” to statement “2,” etc. It is expected that each question will have a varied number of responses, given that qualitative data analysis generates different numbers of responses for each subject.

Each respondent statement (data point) has been evaluated according to the following scale:

- Positive; achieved expected results
- Neutral; Mixed results
- Negative; did not achieve expected results

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The rankings determined are subjective. They are based on statements as confirmed by respondents and on their overall intent. Each qualitative data point includes identifiers as to the stakeholder in question. Some qualitative data points are repeated, as different cohorts often offer similar or identical statements. Every attempt has been made to preserve respondents’ anonymity, although confidentiality cannot be assured.

**EXAMPLE:**

<table>
<thead>
<tr>
<th>How did the new process enable you to do better work?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. I am able to get my work done much more quickly; I saved at least 10 hours a week because of the new process good (UNHCR)</td>
</tr>
<tr>
<td>2. The process enabled me to save a lot of time; it was much clearer and quicker (UN)</td>
</tr>
<tr>
<td>3. ....</td>
</tr>
<tr>
<td>24. While most aspects of the process help, there are some serious bugs; we need to change ... (INGO)</td>
</tr>
<tr>
<td>25. I liked it but there were a few things that could be improved (NGO)</td>
</tr>
<tr>
<td>26. ....</td>
</tr>
<tr>
<td>32. The new system is a nightmare! It takes us longer to process and, actually, it doesn’t even allow us to do ... (UNHCR)</td>
</tr>
<tr>
<td>33. What a waste of money and time; the previous system worked fine; yes, it was old but it worked. This one has forced us to change all of our systems; it takes longer, can’t do the right things; it is very frustrating (Other)</td>
</tr>
<tr>
<td>34. ....</td>
</tr>
</tbody>
</table>

This example illustrates that many more respondents had positive impressions (23) than those who had neutral (9) or negative impressions (3).
6 Jordan: A Response in Transition

The rest of this report includes findings and analyses of conclusions as organised by specific sectors and evaluation levels. All evaluation questions have been answered, although some were moved or merged for clarity and brevity.

6.1 Protection

UNHCR staff in Jordan, especially those with regular and direct contact with persons of concern (refugees14), demonstrate an awareness of protection issues refugees face, be they at the border, in camps or in non-camp settings, and amongst children, men and women, the elderly, and those with special needs, amongst others.

Yet there has been an increase in protection issues and instances of possible refoulement that raise concern. 15 Protection issues are increasing in real terms and as a percentage of persons seeking refuge in Jordan. This is confirmed and reflected in interviews, the qualitative data, and in the post-field phase survey.16

Graph 1 shows that 38% of respondents across cohorts recognise serious issues with protection. As further analysis of this data indicates, this largely concerns the increasing issues at the border and in non-camp settings. This is confirmed in the post-field phase online survey. (Graph 2.)

To date, UNHCR has addressed protection issues in various ways and with various relevant actors. And yet, senior UNHCR staff and other key stakeholders

<table>
<thead>
<tr>
<th>Protection Effectiveness (All respondents)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
</tr>
<tr>
<td>26</td>
</tr>
<tr>
<td>51</td>
</tr>
<tr>
<td>76</td>
</tr>
<tr>
<td>101</td>
</tr>
<tr>
<td>126</td>
</tr>
<tr>
<td>151</td>
</tr>
<tr>
<td>176</td>
</tr>
<tr>
<td>201</td>
</tr>
<tr>
<td>226</td>
</tr>
<tr>
<td>251</td>
</tr>
<tr>
<td>276</td>
</tr>
</tbody>
</table>

Graph 1

| Negative: 38% | Neutral: 27% | Positive: 35% |

Graph 2

Not at All 2.04%

Somewhat 40.82%

Yes 51.02%

Post-field Phase Survey: Is UNHCR’s addressing protection issues effectively? (All Jordan Respondents.)

14 We recognize the legal distinction between ‘persons of concern’ and refugees and will use the latter for brevity and clarity throughout this report.

15 Non-refoulement is a principal of international law concerning the protection of refugees, which holds that they cannot be returned or expelled to places where their lives or freedom could be threatened. Human rights law tends to support conflicts associated with competing rights and resource constraints that restrict protection duties. This arises in the case of Jordan that claims “security first” in turning away certain people seeking refuge, claiming that such persons may represent an imminent threat to Jordanian citizens. For a review. See G. Goodwin-Gill, “Forced Migration: Refugees, Rights and Security” in J. McAdam ed., Forced Migration, Human Rights and Security. Hart Publishing, 2008, pp. 1-18. For a different perspective, see Vijay Padmanabhan, “To Transfer or Not to Transfer: Identifying and Protecting Human Rights Interests in Non-Refoulement” Fordham Law Review, No. 80, 2011.

16 This is raised in other evaluations and studies. See, Roger Zetter, et. al., “The Syrian displacement crisis and a Regional Development and Protection Programme: Mapping and meta-analysis of existing studies of costs, impacts and protection.” Tana, February 2014.
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have stated that the primary way of addressing these issues has been through direct contact with the GoJ, including bilateral discussions at the highest levels. This particular tactic, direct engagement with the GoJ, is possible because of the relationship UNHCR has forged with the Government during and before this crisis, and because of the Government’s commitment and generosity to and for the Syrian refugees. A strong bilateral relationship may be instrumental in Jordan’s continued support of refugees, especially given the economic and social changes created by the crisis. While UNHCR does intervene in protection issues at many levels and through multiple channels, in addition to the bilateral relationship with the GoJ, the increased number of protection issues signals the need for a new approach. As many stakeholders commented, the direct, bilateral approach seems to be less effective. This is confirmed by both the exceptional curtailment of entry granted to refugees and the protection issues and instances of refoulement that UNHCR admits are increasing.

6.1.1 Is protection recognised as a critical element that is associated with all aspects of refugees’ lives rather than as a separate programmatic element? (7.1)

Respondent views on this question are mixed:

| Qualitative Evidence: Is protection recognised as a critical element that is associated with all aspects of refugees’ lives rather than as a separate programmatic element? (EQ 7.1) |
|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 |
| 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 |
| 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 |
| 36% Negative | 33% Positive |

Graph 3
The post-field phase survey shows a similar breakdown: 41% of respondents state that UNHCR addresses protection issues “somewhat.” (Graph 2 above.) Analysis of this qualitative data shows that most comments concern how protection is recognised and treated by senior management and whether or not there has been too much conciliation to the GoJ on access and border issues as well as refoulement. Positive perspectives focus on how protection is recognised and treated at the camp levels and on individual cases, including SGBV and other issues.

On one hand UNHCR, especially in the case of the staff closest to the refugees, focuses on protection issues and works to improve them. On the other hand, there are protection issues related to the GoJ, which has the authority to tighten border control and to use “security first” arguments to deny entry to anyone deemed a threat.

The “security first” argument is often posited as a de facto condition that allows states to take action to protect its citizens, which is considered different from military defence of interests and/or territory. It is also true that the combination of an inflow of fighters to Syria from across the Middle East, the sectarian

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17 This includes both the macro and micro economic impact from the refugees but also the closing of trade between and across Syria amongst other impacts.
18 This Evaluation included interviews with senior protection officers at the Jordan and regional level who confirmed that the protection issues and instances of refoulement were increasing.
nature of the conflicts in the region, and the dire conditions of those affected by the conflict, including widespread and lasting poverty, imply that Jordan, a relatively stable state in the region, may be right to take such measures.

A position of security first may provide the wiggle room in international law for Jordan to breach foreign individual’s protection rights, and UNHCR’s dual role to forge and maintain a relationship with Jordan while asserting the protection needs of refugees presents a quandary. This can be found in statements made by the UNHCR Country Representative to Jordan where he spells out these somewhat competing priorities. To cite just one example from a recent interview, he states:

UNHCR’s role is to ensure that necessary protection and assistance is being provided to the refugees obviously, in support of the government in the host communities. That’s the main objective—to support the government, to alleviate the pressure on it from what is an extremely challenging situation, of almost unprecedented proportion in the Middle East, probably not since 1948 have you actually seen such masses of human people fleeing conflict and crossing borders in the Middle East.  

While the implication is that UNHCR’s role is to both provide “necessary protection and assistance” and “support the government to alleviate the pressure on it”, what should UNHCR do when these are in conflict?

Evidence suggests that UNHCR juggles both, preserving its relationship with the Government while taking issues of protection seriously. Many UNHCR staff argue that it is precisely because of the relationship with the Jordanian government that it can raise protection issues at the highest levels.  

Protection issues are growing. The Jordanian Government is granting fewer refugees access. There are increasing instances of refoulement. Families are being separated at the border due to problems with identification. Refugees are being expelled for working illegally. Refugees are expelled for minor violations, e.g. petty theft. Children are left without their parents.  

UNHCR is negotiating with the Government. UNHCR has asked the GoJ not to penalize Syrian refugees living in an irregular manner in urban areas. The GoJ agreed that holding an asylum certificate or an MOI card or a bail out will be sufficient to regularise their stay in urban settings. While this is an achievement, it has not, at the time of this Evaluation, led to a direct decrease in related protection issues.

UNHCR’s position is growing troublesome: its mandate states protection is of paramount importance. Its primary purpose is to safeguard the rights and wellbeing of refugees; not to “alleviate the pressure on governments” from a refugee crisis. Though these two are intertwined, they are increasingly difficult to maintain in Jordan. To pursue its protection responsibilities, UNHCR may need to adopt different approaches even if there is a risk of increasing tensions with the GoJ.

While difficult to analyse, UNHCR most likely got into this position because it has not adapted its strategy with the GoJ quickly enough and because it has, by doing so much, taking the lead in so many areas, diminished its focus on core mandate areas. UNHCR could argue, and has done so, that it must be involved in all noted activities and sectors because all of these involve refugees. This seems spurious. More importantly, by doing so much UNHCR has lost focus. This is what is so damning about increasing

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21 Please see “Data & Analysis Report: Jordan” for precise qualitative evidence. This report is included as a separate Annex.

22 This was repeatedly mentioned by various respondents and confirmed through a special meeting with relevant protection officers. See also “Iraq/Jordan/Turkey: Syrians Blocked from Fleeing War.” Amnesty International, 1 July 2013.
protection issues. This is a core UNHCR mandate area. An increasing number of protection issues is not only troubling but, in this context, is also a sign that UNHCR has been overstretched to a point where core issues are not getting a necessary level of attention.

This leaves an additional question as to whether refugees have sufficient information/knowledge to recognize protection issues, and the opportunity and courage to bring these protection issues to the attention of UNHCR and others.  

Most evidence suggests that the quality and frequency of contact between refugees and UNHCR and relevant partners is satisfactory. (See Section 6.1.4) Various staff amply described their activities, caseloads, and issues related to protection. Whilst daunting, they describe what works and what doesn’t, and their responses seem satisfactory and comprehensive.  

Refugees outside the camp have limited information to help them navigate the humanitarian system or to access the appropriate government services. This has been pointed out by various assessments/surveys that stress, in particular, the significant differences between refugee men and women when it comes to knowledge of protection services and ways to access them. In some areas where there has been a noticeable increase in information, as in SGBV, increased availability may not have a major impact on use. This may be due to restrictions placed on women regarding their mobility outside of the household and the dispersion of people across different communities.

Dissemination of information on particularly critical issues is problematic. There was confusion and anxiety among refugees and concern among partners regarding the imminent start of the verification process for non-camp refugees that will be carried out by the Syrian Refugee Affairs Directorate (SRAD). As of mid-July 2014, and despite previous communications, there has been no initiative to inform refugees about verification procedures and requirements.

Similarly, UNHCR announced that as of 14 July 2014, it would no longer issue asylum seeker certificates to refugees leaving the camp outside the bail-out system or in an otherwise irregular way. In mid-July, information on this had not been disseminated among refugees.

Finally, there may be some confusion between what refugees receive and hear from UNHCR and from the GoJ. Sometimes refugees’ note a contradiction between GoJ policy at national level & implementation on the ground, which is addressed by contact with UNHCR & partners & then followed up by UNHCR on individual cases and through broader advocacy.

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23 This responds to evaluation question 7.1.1.
24 Please see the “Data & Analysis Report for Jordan” for precise qualitative responses in this regard. This report is included as separate Annex.
25 Inter-agency assessment, “Gender-based violence and child protection among Syrian refugees in Jordan, with a focus on early marriage.” UN Women, 2013
26 For a recent study on the subject that focuses on refugees living in Irbid, Madaba, Mufraq, and Zarqa, see: “Syrian Refugees in Urban Jordan: Baseline Assessment of Community-Identified Vulnerabilities among Syrian Refugees Living in Irbid, Madaba, Mufraq, and Zarqa.” CARE Jordan, April 2013.
27 See minutes of Protection Sector Working Group Meeting of 21 May 2014
These and related issues may fuel the responses to this Evaluation’s household survey in which a vast majority of refugees in camps and non-camp settings feel that they do not have “good information/knowledge.” (Graph 4.) Yet, there is a conflict between what this Evaluation has witnessed on the ground—with active and informed staff addressing individual protection issues—and the feelings of refugees that were interviewed. While refugees have the impression that they do not have “good” information, this does not imply that there are no adequate levels of information. Although communication and information to refugees can be strengthened, UNHCR does seem to be relatively effective given the complexities of reaching refugees in non-camp settings.

6.1.2 What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ protection needs? (7.2)

Protection is exceptionally complicated and involves both direct interpersonal responses and broader advocacy at the highest levels of Government. As noted above, there are signs that UNHCR needs to develop a different approach to the latter while strengthening its activities in the former. This is not simple. The variables are complicated—addressing them may take time and resources, both of which are relatively scarce. Nonetheless, UNHCR needs to develop a detailed protection strategy that focuses on its primary objectives while carefully considering different tactics that address known opportunities and strengths.

Strengths

- Jordan has been willing to receive a large number of refugees.
- UNHCR has had few problems with access and its access to border crossings is increasing.
- Security has been generally good, except in Za’atari camp for the first year.
- Refugees face few cultural or language barriers.
- UNHCR has a long-standing working relationship with the GoJ. UNHCR authority and credibility are strong.
- UNHCR has proven capable of mobilizing institutional and non-institutional actors, including non-traditional interlocutors, on refugee protection issues although this should be broadened given increasing protection issues.  

The constraints, described in the table below, include a ranking, from Low to High, for complexity as well as Easy, Mixed and Difficult, for possible action.

<table>
<thead>
<tr>
<th>Constraints</th>
<th>Complexity/Difficulty</th>
<th>Practicality/Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jordan is not a signatory to the Refugee Convention and has no national legal framework for refugees who are treated under Jordanian alien law. UNHCR has operated in Jordan under a MoU, recently renewed.</td>
<td>The complexity of this lies in international law. The questions of refugee protection and rights in states that are not signatories to the Convention are not clearly</td>
<td>There needs to be a dual track approach to this issue. On the one hand, arguments should be made about how to address socio-political and economic impacts and, on the other, the role of international law in not only ensuring/protecting/promoting refugee rights but also as a cornerstone for</td>
</tr>
</tbody>
</table>

28 For example, the 16 June roundtable with the Ministry of Interior (MOI) and the Syrian Refugee Affairs Department (SRAD), on documentation and legal issues for Syrian refugees, with the participation of representatives from the Ministry of Justice, Parliamentary legislative bureau and legal committee, SRAD, FPD, Ministry of Social Development, Sharia Court, NGOs and UN agency members working on forced and early marriages.
MoU confirms the respect for non-refoulement and allows Syrian non-camp refugees to remain in the country for one year. Refugees without permits are not allowed on the formal labour market. Illegal work is punished with arrest and detention and may result in deportation.

Over 80% of refugees live outside camps, mainly in the north of the country. Identifying and addressing protection needs and vulnerabilities requires extensive outreach.

While UNHCR has previous experience with handling a large influx of refugees and their urbanization in Jordan, the socio-economic characteristics of the Syrian refugees are different, as are their protection needs.

<table>
<thead>
<tr>
<th></th>
<th>MoU confirms the respect for non-refoulement and allows Syrian non-camp refugees to remain in the country for one year. Refugees without permits are not allowed on the formal labour market. Illegal work is punished with arrest and detention and may result in deportation.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Over 80% of refugees live outside camps, mainly in the north of the country. Identifying and addressing protection needs and vulnerabilities requires extensive outreach.</td>
</tr>
<tr>
<td></td>
<td>While UNHCR has previous experience with handling a large influx of refugees and their urbanization in Jordan, the socio-economic characteristics of the Syrian refugees are different, as are their protection needs.</td>
</tr>
</tbody>
</table>

This is made complex by the geographic spread, access, especially to women and children who may not leave their dwellings regularly, and the socio-cultural dynamics that affect Syrian refugees in Jordan.

| | This is made complex by the geographic spread, access, especially to women and children who may not leave their dwellings regularly, and the socio-cultural dynamics that affect Syrian refugees in Jordan. |
| | There are no easy solutions to the protection issues experienced by refugees living outside camps. To an extent, they are ‘finding their own way’ and this limits opportunities for them to avail themselves of services intended for their well-being and protection. |

The linchpin of these efforts is the GoJ. Efforts regarding a range of protection and non-protection related services would, at best, be linked to the GoJ National Resilience Plan.

UNHCR should play a vital role. Its registration process, follow-up, and general support of refugees upon arrival as well as in the crucial months when they find ways to adapt and cope provide a foundation for subsequent work. The fact that these data and information systems are so robust allows for this longer-term support.

UNHCR should increase and amplify its advocacy for refugees residing outside camps, consistently urging the Government and international community to recognise the negative socio-economic impacts of large refugee communities in urban areas and the strategies a Government can deploy to mitigate these.

It may also increase the potential positive economic impacts on local markets and, contingent on an enabling environment, the

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29 UNHCR provided a good, if somewhat dated, analysis of these negative impacts in a note to the Executive Committee from 1997, “Social and Economic Impact of Large Refugee Populations on Host Developing Countries.” UNHCR Standing Committee, 6 January 1997; (EC/47/SC/CRP.7). The following also provides a comparative analysis of the short- and medium-term impact on the wealth of rural and urban areas: Jennifer Alix-Garcia and David Saah, “The Effect of refugee Inflows on Host Communities: Evidence from Tanzania.” The World Bank Economic Review, Vol. 24, Issue 1; 2010. At the same time, the academic research on this subject is not complete given the complexity of the issues and the particularities of any host country. Nonetheless, evidence from Jordan suggests that it matches most of these basic parameters and can expect a significant disruption to economic development.
### Some Partners have limited or no protection experience.

Jordan was previously mainly a regional hub for the response to the Iraqi crisis. However, no previous experience of Syria exists (before the conflict, the presence of INGOs in Syria was limited and their work regulated).

While some of the larger INGOs and other actors have ample protection experience from other regions/crises, there remain some who are engaged in the response who have no such experience. This is partly due to the scale, complexity and pace of the response. It may also be due to the lack of an articulated strategy, separate from the RRP, that could have guided critical areas of the response like protection.

### Refugee see UNHCR mainly as a provider of assistance and services.

In addition, there may be reluctance on the part of some refugees to solicit support with respect to sensitive protection issues that are perceived as belonging to the private sphere.

### Difficult

- The effectiveness of the protection sector signals that competencies are growing and that UNHCR is playing a useful coordination and leadership role. (See section 4.4.4.) While this may not be as quick as required, UNHCR is doing what it can to reduce this constraint.

### Mixed

- This limits what UNHCR can achieve as it needs effective INGO partners, especially outside camps.

### Mixed

- UNHCR already has satisfactory processes in place to gather information from persons of concern at registration and thereafter. In the camps, acting upon violations becomes a matter of resources and action, more than whether or not people have been satisfactorily reached. In non-camp settings, the issue is one of access—see the section immediately above. UNHCR should try harder to increase the flow of information through hotlines, flyers, representatives on the Syrian side, etc., to ensure that people seeking refuge will find help.

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31 A review of Jordan Weekly Helpdesk Reports shows that, while significant numbers of refugees approach the help desks, only a very small minority requests advice/support on protection issues.
**UNHCR’s commitment to uphold the right to asylum and the prohibition of *refoulement* in its diplomacy with the GoJ should not be superseded by concerns over the country’s security.** This is also UNRWA’s dilemma with respect to the systematic barring of entry to Palestinian refugees since the beginning of the year. The protection deficit that has emerged over the barring of access to territory necessarily needs to factor in the overall protection gains achieved for the large number of Syrians already registered as refugees in the country.

**Mixed**

This is not necessarily complex. The equation is fairly clear: Jordan represents one of the most stable countries in the region and acts as a bulwark along the border with Israel. This represents a clear interest to major donors in Europe and North America, among others. The complexity lies in the delicacy of the various relationships Jordan has with different stakeholders. This includes relationships with European and North American partners but also regional partners. What is clear is that UNHCR should hold as paramount the protection and assistance needs of the refugees as distinct from these geo-political considerations.

**Mixed**

There is very little UNHCR can, or should, do to influence or engage in these politics. It needs to focus on assuring the protection needs of refugees are met. UNHCR may provide more information about its efforts to secure access to territory in order to dispel any misperceptions about its commitment. UNHCR may also improve understanding of its handling of the *refoulement* issue by explaining that states have a right to determine who remains on their territory and under what conditions. It is already doing so to a certain extent, but the issues prompt an increase in quantity, velocity, and breadth.

It is unclear whether UNHCR would have ensured greater protection if it had increased its advocacy and diplomacy sooner. Yet, the increase in protection issues prompts a different tactic at this point in time.

**Mixed**

Many respondents perceived that there may be a disproportionate focus on *SGBV*. Many are also convinced that this is donor-driven and that this focus detracts attention from other important protection issues. There is little to substantiate this although the fact that such a broad and significant proportion of respondents perceives this indicates a challenge.

**Mixed**

While the evidence remains inconclusive, this is not meant to reduce or undermine the importance and prevalence of *SGBV* amongst refugees. As noted in Section 4.4.4, it implies that an imbalance could prevent the equitable treatment of protection issues amongst all refugees. On the other hand, donors also have the right to place resources in ways that are in line with their concerns and interests.

Yet, the issue is not so much about a “disproportionate focus” as to a perception that some areas are more successful than others. UNHCR is a victim of its success here. Because there have been significant successes in *SGBV* while other areas of protection are more problematic puts a “spotlight”

**Mixed**

UNHCR could increase its internal advocacy and ensure that more people recognise that achievements in some areas do not necessarily imply a “disproportionate focus”. UNHCR can continue to raise other issues, like specialized services for lesbian, gay, bisexual, transgender and intersex (LGBTI) individuals and for men and boy survivors. This should include innovative ways to facilitate contact with boys and men and give them opportunities to receive specialised assistance.
Staff, while generally qualified and motivated, are working exceptionally long hours and doing so without all the resources that could facilitate their work. This is understandable and—regrettably—common to humanitarian contexts. As the crisis continues, these staff may reach levels of fatigue and malaise that could impact their work, especially in their capacity to empathise and listen.

This is made complex by the availability of human resources, counselling support to staff, and possible rotations. Given the current pause, it may be an opportune time to address the needs of these staff.

Beyond additional resources and direct managerial support to select staff, UNHCR has few opportunities except to remain grateful to these committed and hard working staff.

Mixed

As this table illustrates, while there are some acute protection issues, UNHCR is working in a highly complex arena, with few strategic and practical choices. But it can still do more. It must amplify its advocacy and diligently enlist other stakeholders in relation to refugee protection, rights, and wellbeing. This, however, does not forgive UNHCR from pursing its protection role in every way possible. Some things will be inevitably beyond UNHCR’s control. However, this Evaluation has focused on issues over which UNHCR does have control, like adapting its strategy overall, shifting resource to non-camp settings, and building on achievements while monitoring their results.

6.1.3 Do refugee women, girls, boys and men have equitable access to protection, including access to territory? (1.3)

Evidence from this evaluation indicates serious concerns about protection, including access. Qualitative evidence trends negative in respondents’ comments:

While this provides a “snap-shot” regarding equitable access, there are trends within individual comments. 31% of comments are positive about protection. These concern registration and overall conditions for those in and beyond camps, although not informal settlements. There are a number of comments about border management/access to territory and mixed comments regarding the relationship with Jordan.
borders. Some raise issues about increases in border access protection issues. Some question the bilateral and confidential way in which some protection issues are addressed by UNHCR.

Significant efforts have been put into ensuring that refugees have equitable access to registration and civil documentation. UNHCR has also ensured that original documents are returned through the work with partners, an important aspect for return. The enhanced registration system protects refugees by establishing identity beyond doubt, and, if used for protective purposes, helps to maintain the family unit, prevents trafficking and facilitates durable solutions.32

Access to civil documentation means the opportunity to access public services, register marriages and births, and prevent statelessness. UNHCR’s birth registration campaign, together with UNICEF and SRAD, the establishment of a Civil Registrar and the opening of a Sharia Court office in Za’atari to deal with issues related to family law have enhanced refugee protection in the short- and longer-term.33 Also in Za’atari, UNHCR has started a systematic monitoring of the return of refugees to Syria to understand rationales for these returns and to ensure that any return is voluntary.

The Protection Unit is working on administering over 170,000 identity documents of refugees and provided to the MoI upon arrival. The lack of identity documents had several implications, including issues with obtaining civil documentation and returning to Syria for refugees who so wish. Even more serious consequences can arise from the loss of such documents.

The near impossibility for Syrians to work legally in Jordan has repercussions on protection. It exposes refugees to exploitation and harassment and refugees seeking informal work risk prison and deportation. Reportedly, Jordanian authorities are actively seeking out irregular Syrian workers through inspections in workplaces. Syrian refugees are also threatened with deportation if they are deemed a threat to national security. The concept of national security is broad enough to include prostitution.34

The number of refugees detained remains limited.35 UNHCR can access refugees in detention and tries to ensure that they have access to legal representation. It furthermore intervenes on an ad hoc basis, especially in cases where refugees are threatened with deportation, provided UNHCR is convinced that the case is genuine.

The bailout system in place at Za’atari, through which a refugee can legally leave the camp if he finds a Jordanian “bailer” who provides a guarantee for him, deserves further investigation. Many report that the system is marred by corruption and promotes the exploitation of refugees, while feeding the economic interests of local ‘entrepreneurs’.36 Even though this represents a distinct inequality, this Evaluation recognises that UNHCR is addressing this where possible.

The 2014 Syria Regional Response Plan states “a fundamental tenet of protection is that refugees are able to secure entry to safe territory, and the key protection response remains preservation of access for those fleeing conflict, and protection from refoulement.”37

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32 This is in the context of the additional risks associated with the use of biometrics and the storage of personal data on single electronic databases.
33 “Jordan RRP6 Monthly Update: Protection,” May 2014
35 As reported in “2014 Syrian Regional Response Plan-Jordan” (p.18) 136 Syrians were placed in administrative detention in 2013.
36 Telephone interview with refugee women in Za’atari on 21/6/2014.
37 “2014 Syrian Regional Response Plan-Jordan.” UNHCR. (p. 17)
People fleeing Syria had relatively unhindered access to the territory of Jordan throughout 2012 and until mid-2013. The first months of 2013 saw the highest influx of refugees, with more than 62,000 entering Jordan in February. The GoJ started imposing restrictions at the two official crossing points with Syria in March 2013 and de facto closed the border to refugees in May 2013. Since then, the flow of refugees has shifted about 200 km towards the east. Refugees face long and sometimes perilous journeys through the desert to cross into Jordan. Though security conditions and other obstacles on the Syrian side are also likely to impact people’s capacity to reach the border, the number of arrivals has decreased to 100 - 300 day.

There have been consistent reports of refugees from Syria being denied entry at the border or sent back. This problem was acknowledged in RRP6. UNHCR intervenes, with varying degrees of success, in cases of Syrians who are denied entry at the border, and in particular when family unity is at risk. This is supplemented by the Za’atari & Azraq return monitoring projects. Cases referred by other protection-oriented organizations are also addressed.

In consideration of this situation, RRP6 includes border-monitoring activities as an “essential part of the protection response strategy.” However, this component of the protection response has not been realized. The UNHCR Border Monitoring team consists of two assistant field officers. This seems to be an inadequate level of staffing given the increasing protection needs.

Recurrent cases of denied entry and deportation “amount in many cases to refoulement” according to a knowledgeable UNHCR respondent. Cases of denied deportations from Rabah El-Sarhan were anecdotally put by some respondents at 10%-20% of all those who cross into Jordan. It was not possible to obtain clear information from UNHCR about the existing procedures for entry denial, namely whether there are any rules that establish precedents or procedures, or whether these are respected by GoJ and Jordanian Military officials on the ground.

6.1.4 Do the most vulnerable host communities benefit from improved access to quality essential services and to livelihood opportunities, thereby ensuring that an increased number of refugees benefit from community-based protection? (1.4)

Most services in host communities are provided by Jordan and thus accessible to all. These services are under strain due to the influx of Syrian refugees and the lack of resources to address the challenges in health, education, infrastructure, water, and other services. (See section 6.5.) Syrian refugees establish themselves mostly in the same areas where vulnerable Jordanians live. 53% of the refugees live in the poorest 3 Jordanian Governorates (29% Irbid Governorate, 14% Mafraq and 10% Zarqa) and another 32% in poor suburbs of Amman. Services are therefore oversubscribed with the additional refugee population and under-resourced, because of this additional demand.

The GoJ has also placed restrictions on aid projects that could contribute to services and livelihood opportunities, be they informal or otherwise. Since mid-2013, the Government of Jordan has been requiring systematic pre-approval for all aid projects targeting Syrian refugees through the Ministry of Planning and International Cooperation (MoPIC), with the exception of UN agencies that operate under a

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38 “UNHCR Trend Analysis.” UNHCR, 26 March 2014.
40 “External Statistical Report on Registered Syrians in Jordan.” UNHCR; various dates.
42 “2014 Syrian Regional Response Plan-Jordan.” UNHCR. (p. 23)
43 Interviews with protection staff and senior management; “2014 Syrian Regional Response Plan-Jordan.” UNHCR. (p. 18)
44 Interview with operational partner.
45 “2014 Syrian Regional Response Plan-Jordan.” UNHCR. (p. 25)
national framework agreement with the Government. One of the key requirements has been to include 30% of vulnerable Jordanians on the beneficiary list. The June 2014 inter-agency update highlights that aid organisations have faced an increased rate of rejection by MoPIC and were asked to increase the proportion of Jordanians targeted for assistance to 50%. This increase is viewed as an attempt to pressure international donors to channel more resources through the GoJ as outlined in the National Resilience Plan rather than the RRP.

Community Service, through a multi-functional approach, provides an outreach network in urban areas characterized by a number of Community Centres, Help Desks, cooperation with local Community Based Organizations. There are 13 Community Support Centres distributed across Jordan that aim at fostering positive interaction between refugees and host communities. Their activities tend to focus on women and children (joint cooking classes, literacy classes, activities for children, etc.). Many of these centres reported activities for the World Refugee Day but their impact remains uncertain. This is a model that is showing signs of effectiveness and should be pursued accordingly.

Related to this community outreach, has included various ways to reach refugees and provide them information. These include but are not limited to the Info Line, Amani Campaign, Inter-Agency Service Guides, Help Desks, Town Hall meetings, birth registration, back-to-school campaigns, and SMS messaging service. Community Support Committees (CSCs) also are an important source of information for urban refugees.

In 2013, five Help Desks were established. In 2014, with the addition of 2 Helpdesks, UNHCR is now covering 7 governorates on a weekly basis. On average, the helpdesks serve some 3000 families across Jordan per week. In total, between January 2013 and June 2014, some 210,000 refugee calls had been received and counselled, of which 2200 individual protection interviews were conducted and referrals made.

In parallel, the UNHCR info line was strengthened. In 2013 the daily average was 500 – 700 calls answered per day. This number was increased to 1000 - 1200 a day in 2014. A series of town hall meetings were launched across Jordan to disseminate information to refugee communities on rights and obligations, available services, and to increase interaction with community-based organizations (CBOs) and local authorities. This first cycle reached out to 1650 refugee families in remote locations (some 8000 persons).

100,000 leaflets on service provision were printed and distributed through UNHCR outreach mechanisms, as well as through humanitarian partners. UNHCR developed FAQs for its Info line staff and later adapted them for humanitarian partners and caseworkers. The FAQs, disseminated through the area-based coordination groups and sectors, aim at harmonising and disseminating key messages and answers to commonly-identified questions from the refugee community on all aspect of their stay in Jordan.

Graph 6

Post-field Phase Survey: Does UNHCR track incidences of social tension between local populations and refugees?

<table>
<thead>
<tr>
<th>Yes</th>
<th>Somewhat</th>
<th>Not at All</th>
</tr>
</thead>
<tbody>
<tr>
<td>37.66%</td>
<td>38.96%</td>
<td>6.49%</td>
</tr>
</tbody>
</table>

35
While this multi-varied approach seems appropriate the direct impact of these remains to be seen. This is not to imply that they are not or will not be successful. Simply, that such communication strategies have inherent weaknesses and strengths and these will need to be borne out in the Jordanian context.

The Jordan Response Platform to the Syria Crisis, Chaired by MoPIC, is designed to address some of the issues host communities are facing. It is not clear, however, if this will include direct participation from community members and Syrian refugees to facilitate how issues are diagnosed and resolved. Nor is it clear whether the current National Resilience Plan can move from needs towards an articulated plan for how different actors will respond to social cohesion issues in communities, especially those most impoverished governorates in the north where the majority of Syrian refugees reside. It is even less clear whether Jordan will receive the necessary funding to bring the National Resilience Plan to fruition.

Similarly, it is unclear how assistance from Gulf Countries and Islamic organisations, estimated at approximately US$120 million for 2012-2013, can be integrated with other humanitarian assistance activities and with the National Resilience Plan. There is continuing uncertainty about the provision of longer-term development assistance. This is especially complicated in non-camp settings where, despite the extensive Home Visits Programme and cash assistance, gaps in protection and assistance remain.

UNHCR could strengthen its role in non-camp settings. The “2009 UNHCR Policy on Refugee Protection and Solutions in Urban Areas” includes “commitments to refugee rights, state responsibility, partnership, needs assessment, equity, community orientation, interaction with refugees, and, importantly, self-reliance.” UNHCR is not only not meeting many of the commitments laid out in this policy but also has limited ways to track the tensions that exist between refugees and host communities. This is reflected in responses to the post-field phase survey. (Graph 6.)

6.1.5 What is being done to prevent and respond to sexual and gender based-violence (SGBV)? What else could be done? (1.3.4)

UNHCR’s protection response has a strong focus on SGBV. This is the result of the commitment of the senior management, close inter-agency cooperation, and the presence of a GenCap Gender Advisor, who was seconded to UNHCR in 2013, and sufficient funding for most activities, amongst other issues.

The work of the Gender Advisor has led to the inclusion of gender analyses and gender markers in RRP6, and the support of focal points and technical guidance for relevant working groups. Awareness of gender issues is therefore prominent amongst most partners.

Significant efforts have been made to improve the quality of the response to SGBV. The SGBV working group-led interagency strategy focuses on early marriage, domestic violence, transactional sex and sexual violence. The strategy has a focus on information and access to services. This and other studies have shown that many women have limited freedom of movement, particularly in urban settings, either imposed by their male relatives or self-imposed, for fear of being harassed and attacked. This has a direct bearing on....

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46 This section responds to evaluation questions 14.1 and 14.2.
47 This section responds to evaluation questions 14.4 and 14.5.
on access and even knowledge of SGBV services. A UN Women inter-agency assessment found that 83% of women interviewed had no information about services available to victims of SGBV in their area.\textsuperscript{51}

Other achievements include:

- Protection mainstreaming: Through a peer-review approach implemented at inter-agency level, other sectors designed programs that engage with communities in design, planning and implementation of their projects.
- UNHCR has initiated a project to raise awareness among UNHCR staff to protect better LGBTI refugees.

While knowledge of available services has improved, this is not supported by the results presented in the Mid-Year Update, according to which all achievements were below target. This interest for and focus on SGBV is constrained by a number of factors:

- An adequate outreach network is still being established, and the availability of services is enhanced accordingly.
- Reaching women with no access to services or knowledge due to their restricted mobility is proving difficult.
- Reaching out to boys and men is challenging given common perceptions of SGBV.

There are a number of other issues worth noting.

Early marriage among refugees is gaining attention. In 2014, UNHCR, together with UNICEF and UNFPA, set up a taskforce on forced and early marriage that aims to tackle the issue through the design and implementation of joint actions. Whether awareness-raising efforts can achieve significant results in the short term is far from clear. Protection actors acknowledge that early marriage was common practice in Syria prior to the conflict. It is understood that under the current circumstances early marriage also responds to needs arising from the displacement (as a coping mechanism in the light of real or perceived security risks for young girls, as a means to ease financial difficulties, and other reasons).\textsuperscript{52}

An interesting component of the SGBV objective in RRP6 is the participatory element, i.e. the intended involvement of over 6000 women in the design, implementation and review of SGBV prevention activities.

Finally, it would be appropriate to reflect on how other issues and UNHCR’s response to them may be linked to increased vulnerability to SGBV, e.g. the impact of the deportation of male refugees on the families they leave behind, including their increased vulnerability to SGBV.\textsuperscript{53}

6.1.6 What is being done to protect children from neglect, abuse and violence? What else could be done? (1.3.5)

Data and information available depict a grim picture of refugee childhood. In June 2014, 52.2% of Syrian refugees in Jordan were below 18 years old.\textsuperscript{54} While having to cope with the consequences of violence and loss experienced in Syria, refugee children in Jordan have low school enrolment rates, are subject to high

\textsuperscript{51} IBID.
\textsuperscript{52} Inter-agency Assessment. “Gender-based Violence and Child Protection among Syrian Refugees in Jordan with a Focus on Early Marriage.” UN Women, 2013.
\textsuperscript{53} The document “Spontaneous Returns from Jordan to Syria and Strategy,” UNHCR Jordan, February 2014, mentions in the paragraph related to motivations to return: “women/families go back to Syria to reunite with husbands/fathers deported (mostly for working without work permit).”
\textsuperscript{54} “UNHCR External Statistical Report,” 21 June 2013.

levels of verbal and physical violence at home and in the community, are at risk of recruitment and sexual exploitation, and are increasingly involved in the labour market. The evaluation team met with a group of male teenagers aged 13 to 17 in Azraq camp. During an informal conversation, they expressed dissatisfaction with their lives in the “Azraq prison.” All expressed the intention to “do something,” for example leaving the camp to find work.

Objective 4 of RRP6 for Jordan, as well as the related outputs, concerns strengthening capacity development and coordination mechanisms and improving quality of services for children. In this regard, UNHCR-led efforts have been effective in many respects. The child protection sub-working group, co-chaired by UNHCR and UNICEF, leads coordination, advocacy and capacity-building efforts, as well as child protection mainstreaming in all other sectors. The aim is to strengthen, in particular, the response to the protection needs of unaccompanied and separated children, child labourers, children associated with armed groups, victims of violence, and in conflicts with the law.

A significant achievement of the child protection and SGBV sub-working group has been the development of standard operating procedures aimed at harmonizing case management, reporting and referral. Extensive training of NGO workers and government staff has been carried out as a part of the rollout. Together with UNICEF and UNFPA, UNHCR has consistently sought to integrate the response in the existing national framework, seeking the cooperation of national actors and institutions, such as the Family Protection Department, and at the same time supporting their capacity building.

Another significant endeavour has been the design and implementation of the Amari campaign, a collaborative inter-agency effort aimed at raising awareness on child protection issues and promoting community responsibility and commitment to the protection of children. The Amari campaign, for its scale and scope, can be expected to influence the refugees’ understanding and perceptions of core child protection issues.

Specific child protection issues prioritized by the sub-working group are diverse and require different strategies and approaches. However, it is fair to say that some, most notably child labour, are more difficult to tackle at the current level of the response than, for example, unaccompanied and separated children.

The risk of recruitment of minors in the camps is being addressed in cooperation with UNICEF and in close coordination with the Syrian Refugee Affairs Directorate. The response focuses on preventing underage refugees from travelling back to Syria on their own and identifying those at risk of recruitment.

An issue that does not appear to be high on the protection agenda, and which was mentioned by some respondents, is that of minors being turned away at the Jordanian border. It is not clear whether/what specific procedures are in place to ensure that minors showing up at the border to be united with their families in Jordan are admitted.

As mentioned earlier, there is concern that youngsters seek livelihood opportunities that could put their protection at risk. For example, the particular situation of teenage refugees who find themselves being ‘the

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56 Some of the youth were involved in recreational activities in the camp. However, they did not consider them as something related to their priority needs and wanted to talk instead about their “need to work” and support their families.

57 “Terms of Reference,” Child protection sub-working group Jordan; December 2013.


60 “Spontaneous Returns from Jordan to Syria and Strategy.” UNHCR Jordan, February 2014.
man’ of the household, and responsibility and frustration they experience are challenging. These are being addressed in the camps, including the Za’atari Youth Task Force and agencies who are supporting youth spaces and mentoring programmes (IMC, Mercy Corps, IRC and Questscope). There are also increasing efforts to provide for higher education in the absence of vocational or certified non-formal education opportunities. While these are significant, they focus on the camps and there remain gaps there, and to a greater extent, in non-camp settings.

Concern regarding child labour is growing.\(^{61}\) Two recent ILO assessments highlight this growing need and the challenges associated with it.\(^{62}\) Child labour is closely linked to other issues and vulnerabilities, including the refugees’ difficult access to livelihoods, access to education, and the large numbers of female-headed households.\(^{63}\)

6.1.7 Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ protection needs? Could they have done anything different given the context in Jordan and Lebanon? (7.3)

As noted in Sections 6.1.1 – 6.1.4, there is growing concern that UNHCR and its partners are not fully meeting refugees’ protection needs in Jordan. At the same time, it is not clear whether they could or should have done anything differently. The rapidity of the crisis and the immediate needs of the refugees required a swift response. Until mid-2013, before access to Jordan was restricted and before the increase of protection issues, UNHCR was able to meet this challenge.

This is in no small part due to how the GoJ responded and supported the refugee crisis, either in collaboration with UNHCR and its partners, or beyond. The issue, as repeated by diverse stakeholders during this Evaluation, is one of timing. UNHCR should adopt a revised strategy with the GoJ going forward.

Another issue involves focus. It appears that some protection concerns are addressed with more conviction than others. For example, dissemination and advocacy work addressing SGBV has been sustained and continues to benefit from inter-agency, inclusive processes and structures. Though the impact of such efforts can only be appreciated in the longer term, UNHCR and its partners are implementing initiatives likely to contribute to alleviating SGBV. Other protection issues are not receiving the same attention. One clear example is specialized services for lesbian, gay, bisexual, transgender and intersex (LGBTI) individuals, and for men and boy survivors. Other examples include those related to boys and men who face particular vulnerabilities when they leave camps, especially when they do so unofficially.

Protection issues in Za’atari could have also been addressed differently. The initial focus of the response was on meeting the immediate material needs of the refugees in the Za’atari camp. As one respondent put it, “We were busy putting up tents, not thinking about protection.”

A lack of knowledge and understanding of the context in Syria, especially in Dara’a from where many refugees fled, and the related socio-economic issues that were affecting these refugees, may have contributed to initial missteps. For instance, respondents mention UNHCR’s accidental empowerment of certain self-appointed leaders in the camp. This resulted in a critical delay in dealing with the mechanisms of power emerging in the camp, refugee attitudes vis-à-vis UNHCR and the humanitarian community or

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refugees’ interaction with local authorities, and ultimately contributed to a climate of insecurity and violence.  

While the Syrian refugee crisis has its own features, the fundamental mechanisms at work in refugee camps are not new to UNHCR. The evaluation mission was told repeatedly that the lessons learned in Za’atari were applied in the establishment of Azraq camp. This is an important achievement.

Yet, guidelines on sensitive camp settings have existed for two decades, and UNHCR already addressed the issue back in 1991. It is not clear whether these practices were consulted, let alone applied. In fact, there is ample literature and best-practice documentation on many, if not most, issues that were raised in this response. It was, as described elsewhere, the need to react quickly to a rapidly escalating crisis that prevented this type of due diligence and planning. One might expect that a strategy could have guided this work, a strategy based on UNHCR’s years of experience.

### 6.1.8 What could UNHCR do differently to strengthen how it ensures refugees’ protection? (7.4)

The first two recommendations below are taken from the text above. Additional recommendations are derived from the same analysis. Some issues are noted but are not presented as formal recommendations.

- **Recommendation 1:** Address increasing protection issues. This should include a specific strategy that may include efforts to increase and adapt the engagement of other partners, including other UN organizations, NGOs, and governments, and continued consultation with the Government of Jordan. Various donors express an interest in taking a more active role in this regard and they have relationships and channels that could prove fruitful for the assurance of refugees’ protection. This should include—regardless of certain pitfalls—tighter coordination with UNRWA whose experience with Palestine refugees could prove vital. While maintaining its leadership position, UNHCR should adopt this as an additional strategic tactic in combination with its already strong bilateral relationship with the GoJ. This should be measured by a direct decrease in the number of reported protection issues, thus reversing the current trend.

- **Recommendation 2:** Monitor access to the territory and incidents of deportation in a systematic way to adopt a strategic approach in advocacy, while increasing outreach to those seeking refuge. Monitor incidents involving refugees and law enforcement agencies both in the camps and beyond. While UNHCR has increased its efforts to be present at the borders and in outreach on both sides, without direct oversight and third-party monitoring, the extent of the problem remains relatively unknown. It is not clear whether those seeking refuge are aware of different forms of recourse. UNHCR should make every effort to increase information, through hotlines, flyers, representatives on the Syrian side, etc., so that people seeking refuge have a chance of succeeding. This implies a much more coordinated information system between regional actors.

- **Recommendation 3:** Information about women’s and girls’ restriction of movement for fear of harassment and physical attacks must be dealt with more consistently and perhaps separately from SGBV. While some efforts for SGBV protection are proving effective, there remain significant gaps in non-camp settings. This indicates that UNHCR should increase its attention in this area and that donors should support UNHCR’s efforts in this regard.

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• Ensure that participatory approaches with refugees are upheld. Participation has to be meaningful: the refugees have to be allowed to contribute to the definition of strategies and activities likely to enhance their protection. Where this is not the case, it can exacerbate frustration and a negative perception of UNHCR.66

This is not meant to imply that UNHCR does not already include participatory approaches. The AGDM Participatory Assessment is conducted regularly and seeks to: (i) obtain an overview on the refugee situation in the Urban Areas; (ii) identify the humanitarian needs of refugees and prioritize them; (iii) understand the coping mechanisms of refugees in Jordan (with a view to supporting positive, community-based coping strategies and to reduce and/or mitigate negative coping strategies); and (iv) provide a framework for immediate and longer term interventions. As an example, during the 2104 AGDM PA held in March 2014, a total of 115 Focus Group Discussions FGD were conducted with refugees (77 FGD with Syrians, 18 with Iraqis and 20 with Somalis and Sudanese, in addition to 18 Key Informant Interviews). These interviews and discussions brought a wealth of information that were used in planning, advocacy and daily work. As an example, the findings of this PA were used in developing a concept note on increasing the provision of services to Somalis and Sudanese. Furthermore, UNHCR holds monthly meetings with the representatives of Syrians, Somalis, Iraqis, Sudanese through the CSCs on a regular basis. As this example, sites these types of approaches are critical and should be upheld and expanded wherever possible.

• Support and strengthen national NGOs. Since the Iraqi crisis, UNHCR has built working relations with several NGOs. The magnitude of the Syrian refugee influx with the need to scale up quickly and the arrival en masse of large INGOs, has taken precedence over the importance of continuing to build this cooperation and support capacity enhancement.67

• Relevant organisations should increase support for vocational training, legal access to economic activities and livelihood strategies for refugees.68 The current situation forces many refugees to rely exclusively on aid, fuel exploitation, and may force some refugees to resort to negative coping mechanisms. This can hinder the capacity of refugees to re-establish in Syria or elsewhere. This needs to be done with the consent of the GoJ.

6.2 Assistance

UNHCR, its partners and—critically—Jordan itself, have largely met the refugees’ assistance needs. This includes basic, life-saving needs including food, shelter, core relief items, health as well as provisions for safety and protection including cash assistance, water and sanitation, child protection, education, mental health and psycho-social support, community services, and livelihood support. As the number of refugees has grown in camp and non-camp settings, so have these needs.

The interplay between UNHCR’s coordination and implementation and the GoJ’s continued generosity in opening its primary services to refugees, including, but not limited to, health and education, has largely prevented this from turning into an even worse humanitarian crisis.

66 See the Protection sections in the “Data & Analysis Report: Jordan.” Transtec; available as a separate report.
67 Some recommendations have not been formalized as they are not sufficiently linked to UHHCR’s role, viable overall, or because progress is being made.
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It also raises complications as the crisis continues. Jordan is wary of long-term integration of the refugees into Jordanian society as this, like the Palestinians absorbed in the past, dilutes what Jordan maintains as an essential national characteristic: the links to its Hashemite culture and history, the potential and real social and political strains, and the clearly negative impact on its overall economic development. Whether or not the merits of Jordan’s position can be debated is irrelevant: it is entitled to its own stance.

This presents a distinct challenge. Jordan’s generosity, understanding, and exceptional efforts should be lauded and are of paramount importance to the refugees’ continued assistance. However, the levels, diversity, and long-term implications of refugee needs have forced Jordan to recognise that this is not a short-term crisis but rather one with long-term consequences. While unconfirmed, this may have influenced Jordan’s decision in late 2013 to dramatically reduce the number of refugees.

The other critical aspect of assistance concerns the varying needs and access of the approximately 80% of refugees living outside camps. In fact, the refugee flows through the camps and the “bail-out” system indicate that the camps have become a way station for some in search of more desirable solutions with families, friends, acquaintances and other refugees who have settled. Along with other information, this indicates that the internal flow of refugees within Jordan is fairly dynamic, with some moving from place to place as their exile continues. 69

Finally, the number of new refugees in Jordan has dropped since November 2013, and there is little sign that Jordan will change its position regarding its borders, security, and entry for those seeking refuge. This, as many respondents state, has created a “pause”. This is not really reflective of the crisis as a whole. At the time of writing, the number of refugees has exceeded 3 million. The actions of the Islamic State (ISIS), the war in Gaza, the transitions in Iraqi leadership, the potential spill-overs from the Syrian conflict in the Golan, among other issues, keep this crisis highly volatile and unpredictable. Jordan, for its part, seems intent on keeping the Syrian refugee population within its borders to around 600,000. This and other factors call for a transitional plan, a move towards resilience and recognition of the longer-term impacts and prospects of the refugees in Jordan. This should be the focus of most assistance initiatives going forward.

6.2.1  Are the assistance needs of the most vulnerable refugees met equitably and adequately? (1.2)
As stated above, UNHCR has met assistance objectives satisfactorily. Most evidence suggests that there has been effective support for all registered refugees without delineation between specific individual or family needs. In fact, cash assistance is largely “blanket assistance”, e.g. vulnerable families are provided a standard package of assistance as based on home visit vulnerability assessments. They either qualify or not rather than determining particular needs per family. The GoJ has opened its health, education, and other services to registered refugees, and while these services are showing considerable strains, there has been no noticeable move to restrict these services for refugees.

At the same time, “blanket assistance” in cash and core material needs in particular could benefit from more differentiated targeting, to ensure that people receive what they need with more precision, that the most vulnerable are served well, and that those who do not require such assistance do not. The Needs Assessment Registry and the Inter-Agency Information Sharing Portal will support differentiated targeting. UNHCR will need to be mindful of any inequalities that may emerge unintentionally from such differentiated targeting. Such targeting requires a fairly robust set of analytics and profiles, and regular updates that can drive targeting. UNHCR will need to ensure that it maintains an equitable level of assistance while meeting the needs of all refugees. This should ward against lop-sided assistance, which

69 Some move with different labour opportunities, especially those agricultural opportunities in the Jordan River Valley.
favors certain groups with specific interests (SGBV, children) while perhaps neglecting other vulnerable
groups (boys, pastoralists, etc.).

This will be supported by UNHCR’s advanced registration system and the data that has been collected by
UNHCR, its partners, and others. At the same time, constrained resources may require UNHCR and its
partners to make decisions about vulnerability levels and qualified profiles. This is where issues of equity
and fairness must have appropriate prominence.

UNHCR should be lauded for the breadth and depth of the assistance it has provided so far. At the same
time, the breadth of assistance points to an ever-expanding role for UNHCR. It is the lead or actively
engaged in over 18 different core areas, from camp management and coordination to education, nutrition,
and health. While UNHCR does not lead all of these, it does play a central coordination and funding role.
This is not meant to undermine UNHCR successes to date but to indicate, as based on best practices and
common sense that when an organisation is compelled to do everything it can lose focus and/or suffer
performance gaps. This, as illustrated throughout this Evaluation is a material risk for UNHCR.

A record of relative success does not guarantee continued success and, in fact, increases risk. This is an
increased risk that refugees should not bear, as it could adversely affect equitable and adequate assistance
for the most vulnerable. For instance, perhaps UNICEF should manage, coordinate, and lead all education
initiatives and increase its own fundraising. Perhaps WHO, in direct coordination with the Ministry of
Health (MoH), should develop policies and approaches to meet the growing burden on Jordan’s healthcare
systems. The same logic holds for other sectors and activities. UNHCR, in both cases, will still have a
primary focus on refugees while, in the instance of WHO as co-lead in the health sector, will have primary
responsibility for working with the MoH. At the moment, evidence strongly suggests that the “dual
leadership” is not clear and, as a majority of relevant respondents have stated (See Section 6.3.1.),
UNHCR’s role as both a funding agent and technical lead, as well as coordinator, presumes an inordinate
amount of control and power (if not authority) over how things operate.

6.2.2 Has community empowerment, engagement, outreach and self-reliance been strengthened
towards the assistance provided to persons with specific needs? (1.3.3)

Objective 2 of RRP6 for Jordan includes strengthening and expanding community empowerment,
engagement, outreach and self-reliance, as well as involving refugees in the planning, implementation and
evaluation of services. This objective is different for RRP6 for Lebanon. For Jordan, it does not have a
specific focus on addressing persons with special needs: is more concerned with community engagement in
planning, implementation and evaluation of services.

In Za’atari, the difficulties faced in quickly and effectively mobilizing the refugees had serious consequences
for several months. Thanks to remedial action taken in late 2013, the situation improved. Though some
aspects of community mobilization and engagement may not be ideal, mechanisms and systems are now in
place to foster a sense of community and shared responsibility.

Community work outside the camps is complex and yet UNHCR is making productive strides in this area. UNHCR’s previous experience with Iraqi urban refugees in Jordan has provided a foundation for this work.

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70 These 18 areas are included in the UNHCR Inter-agency Information Sharing Portal and include camp management, cash
assistance, child protection, community services, coordination, core relief items, education, food security, gender-based violence,
health, livelihood, mental health and psycho-social support, nutrition, protection, registration, reproductive health, shelter, water
and sanitation.

The existing working relationships with partners experienced in outreach work with Iraqi and other refugees is an additional advantage. To integrate the interventions as much as possible into the local context and existing structures, cooperation has been established with civil society organisations. UNHCR and partners have involved local authorities and have been successful in the realization of small projects that seek to defuse tensions and contribute to a protective environment.

Measuring progress is not simple. Some outputs are in fact activities, the implementation of which is relatively easier to achieve and measure. Other outputs are sub-objectives, which entail changes at a societal, structural level. It is questionable whether such changes can even be consistently addressed, let alone produced, in the lifespan of the RRP and in an emergency response set-up.

Translating theoretical concepts of ‘empowerment’ and ‘self-reliance’ into concrete and meaningful actions presents additional challenges. For instance, what does ‘strengthening and expanding’ self-reliance mean in a context where refugees have no access to the formal labour market and face arrest and deportation for working illegally?

Equally important to successful outreach and community work is that refugees receive timely feedback on requests, queries, as well as on the outcome of home visits, and participatory assessments. This does not seem to always be the case, prompting some refugees to comment that UNHCR’s work in communities is about “filing papers.”

6.2.3 Does the targeting and planning of long-term national programs benefit from a structured dialogue and a timely provision of quality inter-agency assessment information? (1.5)

Long-term targeting and planning has been hampered by Jordan’s hesitation to accept this as a protracted crisis with long-term implications. This changed in 2014, especially with the publication of Jordan’s National Resilience Plan. It calls for an investment of US$2.48 billion from 2014-2016 across different sectors.

While Jordan is now acting to address the long-term implications of the crisis, it also recognises that the strain on its economy means that any assistance from humanitarian actors is insufficient:

It is widely acknowledged across all parties responding to the crisis that the current levels of financing and modus operandi of humanitarian aid are unsustainable in their present form. An array of critical issues, including those of political, macro-economic, social cohesion and stability, alongside the stress placed on national and local institutions and budgets to sustain a decent

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73 For example, this has allowed UNHCR to carry out a large-scale assessment based on over 62,000 home visits. “Syrian Refugees Living Outside Camps in Jordan: Home Visit Data Findings.” 2013. IRD, UNHCR Jordan.
74 For example, Output 2.5 “Psycho-social support services are strengthened and expanded.”
75 For example, Output 2.4 “Community empowerment and self-reliance opportunities for refugee and host communities are promoted as part of comprehensive protection interventions.”
76 “Power can be defined as the capacity to make informed choices and have the freedom to take action. Empowerment is not something that is ‘done’ to people; it is the process by which individuals in the community analyse their situation, enhance their knowledge and resources, strengthen their capacity to claim their rights, and take action to achieve their goals. At the same time, others recognise their capacities and skills. Empowerment requires change at the individual and structural levels.” “A Community-based approach in UNHCR operations.” UNHCR, January 2008 (p. 20).
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service to the combined refugee and hosting populations, all stretch beyond the mandate and reach of conventional humanitarian agencies.\textsuperscript{79}

While it is unclear how such funding will be assured, it does provide a Government plan for dealing with the consequences of the influx of refugees who solicit Jordan’s public services.

Given this context, inter-agency assessments, targeting, or planning, should be adapted to support Jordan’s National Resilience Plan. This will be facilitated by the volume and generally high quality of inter-agency assessments. There is a mountain of data, information and analysis that the Ministry of Planning and International Cooperation (MOPIC) and other line ministries could draw upon as they develop strategies and plans. However, these assessments are voluminous and tend towards specific aspects of a sector or activity. They do not provide sufficient, broad, strategic analysis of how a single Ministry could act.

UNHCR is certainly playing a relatively effective role in the dialogue between different partners and the GoJ. It has also largely facilitated the inter-agency coordination in ways that support the necessary move to a more structured and strategic operational plan with the GoJ. As in other areas, UNHCR’s prominence, while important, may also be a liability in its capacity to focus on refugees’ protection and assistance needs. UNHCR needs nimbleness to facilitate these discussions while narrowing its own role and the leadership it provides to what most directly related to the refugees.

6.2.4 Have satisfactory humanitarian standards (e.g. Sphere and/or UNHCR) been met? (1.6)
Evidence suggests that Sphere and/or UNHCR humanitarian standards have been met satisfactorily in nearly all areas.\textsuperscript{80} There are concerns in water and sanitation in Za’atari camp but these have been largely resolved. There are, as in other areas, concerns that some standards are not met in non-camp settings although this has more to do with access and coverage than actually not conforming to standards.

Standards and objectives for different sectors are described in Section 6.5.

6.2.5 What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ assistance needs? (8.1)
Constraints:

- **Complexity, scale and pace of the crisis.** The numbers associated with this crisis are daunting. The total number of refugees went from approximately 29,000 in July 2012 to 600,000 in July 2014.\textsuperscript{81} Over 80% of refugees reside in urban and rural areas, with growing numbers living in informal settlements. These refugees need an array of services, from psycho-social to shelter and cash.

- **Variations in needs, access and available resources between camp and non-camp settings.** Refugees in non-camp settings are concentrated in the four northern governorates, with many others spread throughout the country. While UNHCR, its partners, and others recognise the needs of those living in non-camp settings and have done—and continue to do—what they can to meet these needs, the burden falls on the GoJ, which opened its primary services to refugees. UNHCR will never be resourced or generally equipped to lead and coordinate the assistance needs of such a dispersed population.

- **Variations in the capacities and leadership of the exceptionally diverse range of implementing partners.** UNHCR Jordan coordinates and works with 64 different partners. Inevitably, some of these are more committed, more competent, better at leveraging available resources, and otherwise more effective in meeting refugees’ needs. UNHCR could conduct more systematic performance appraisals

\textsuperscript{79} IBID; page 22.


\textsuperscript{81} Inter-agency Information Sharing Portal.
of these partners and conduct better due diligence before funding. The scale and pace of the response have largely curtailed that so far.

- **Initial strategies and tactics with the GoJ may complicate how UNHCR meets protection and assistance needs in the future.** UNHCR has forged a bilateral relationship with the GoJ, as is common practice. What is somewhat less common is the duration of this relationship: it started before the Syria response, and the scale, complexity and impact of the crisis on Jordan’s development. This bilateral relationship provides UNHCR significant access, even though the nature of the bilateral relationship may limit UNHCR’s ability to challenge the Government on key issues, especially regarding access to territory, protection, assistance in urban areas, and livelihood strategies. This does not mean that UNHCR relies solely on bi-lateral engagement. Rather, there may be a better balance with other tactics, and a longer-term strategy is now required for assistance and protection needs.

- **Lack of a focus on efficiency, adaptive/flexible organisational structures, and other measures that could diminish duplications, overlaps, and other inefficiencies.** As described in Section 6.9, UNHCR has not been as efficient as it could be.

Given these constraints, it is exceptional that UNHCR has met refugees’ assistance needs so well.

**Successes:**

- **Commitment, skill, and experience of staff.** This cannot be overstated. While difficult to qualify or quantify, this was repeatedly mentioned as a key strength of the Response. This also poses a potential risk if, as evidence suggests, many staff are becoming exhausted and experiencing increased accumulated and acute stress. UNHCR also faces a “labour bubble” in how it will re-assign staff once different aspects of the response contract.

- **Capacity to adapt, respond and develop in relation to the complexity, scale, and pace of the crisis.** Qualitative and quantitative data point to this, as do the facts on the ground. UNHCR’s capacity to continue to largely meet its stated objectives (See section 6.5.) and to do so relatively adequately and equitably (See section 6.1.3.) while improving key processes, e.g. registration, and introducing and leveraging technology, e.g. the registration process overall, bar-code scanning of Syrian identification, the use of online information portals, etc., all indicate a capacity to adapt, respond and develop.

- **Overall leadership within UNHCR and at inter-agency and sector working group levels.** Qualitative and quantitative evidence indicates that most partners are satisfied with UNHCR Jordan’s leadership and with how it coordinates activities, shares knowledge and information, and the general demeanour and good humour of many of its officers. (See section 6.3.)

- **Overall leadership and support from UNHCR HQ.** The organisation has largely leaned forward to the Syria response, providing considerable support in everything from technical and operational support to human resource management. The High Commissioner has been actively involved throughout. The organisation is committed to supporting all facets of this response, and this greatly facilitates the way assistance is provided to refugees. However, UNHCR may be reaching a breaking point. Other crises, emerging and advanced, from Ukraine to CAR, require UNHCR’s attention and resources. It is not clear what a “breaking point” might entail, but it surely would not bode well for refugees.

- **Strong relationship with the GoJ.** While this Evaluation recommends a new and/or expanded strategy with the Government, one should not underestimate the value of the existing relationship. It is

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82 This is not unique to Jordan. See, Alexander Betts, “Regime complexity and international organizations: UNHCR as a challenged institution.” *Global Governance*, January 2013.
impossible to adequately discern how much of this can be attributed to the good graces, understanding, and commitment of the Government and/or UNHCR’s bilateral approach, but it is most likely a combination of the two. The benefits of this are related to continued access to basic services, the ability of UNHCR to raise protection issues at the highest levels, and this bodes well for how the relationship needs to evolve.

- **The focus on innovations, technology and other approaches can become standards for other UNHCR responses.** As noted repeatedly in this Evaluation, UNHCR has introduced a number of innovations and technologies, including, but not limited to, the registration system, IRIS Guard system, and online information portals that have served the response well. Immense opportunities remain here, but this has been a significant strength of the response so far. (See section 6.9.3.)

- **Generosity, understanding and patience of the international community.** While funding requirements as noted in the RRP’s have not been met, the amount of money provided for the response is nearly unprecedented. OCHA estimates that 9.3 million people need assistance, with 6.3 million displaced within Syria and 3 million refugees in the region. Total appeals in 2013 topped US$5.2 billion, making it the largest UN appeal ever.  

6.2.6 **Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ assistance needs? Could they have done anything different given the context in Jordan and Lebanon? (8.2 & 8.3)**

While there are various issues with respect to how UNHCR has progressed towards objectives related to assistance (see sections 6.5 and 6.6.), there are few things that UNHCR could have done differently. This is reflected in the post-field phase survey. (Graph 7.) The majority of respondents believe that UNHCR set appropriate priorities. These priorities guide the choices UNHCR made and, overall, respondents and other data indicate that these priorities have focused on the assistance needs of the refugees.

As noted elsewhere, this could have been better structured or underpinned by a comprehensive, non-resource based strategy, yet UNHCR made the best decisions possible given this deficit.

Graph 7 also indicates that a fair number of respondents think that UNHCR does not have the right priorities. When compared with relevant qualitative data, various issues emerge:

1. Relatively slow progress in devising a functioning camp management plan for Za’atari.
2. Recognition and forward planning regarding the environmental impact of a camp the size of Za’atari.
3. Establishment of common and static indicators for key sectors that could be agreed upon and used by all partners. (See section 6.10.3.)
4. Increased focus on refugees in non-camp contexts. (See section 6.5.)

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These issues are also related to other areas, including protection and coordination. Note that this list is not exhaustive. For instance, the way in which human resources were managed, moving from temporary contracts to longer-term contracts, and the use of local talent, could all have led to a more effective delivery of assistance. Yet, the refugees’ needs have been met remarkably well given the scale and complexity of the crisis. From that point of view, despite problems and challenges, UNHCR set priorities and made decisions that seem appropriate.

### 6.3 Coordination
Except with regards to the coordination between UNHCR and the Humanitarian Country Team (HCT), Resident Representative (Res Rep) and the Humanitarian Coordinator (HC), UNHCR has been exceptionally effective in its coordination role in Jordan. UNHCR’s sector approach has proven effective and the interagency and sector level of coordination has been mainly effective, with significant improvements over the course of late 2013/2014.

#### 6.3.1 How do different stakeholders describe UNHCR’s coordination role? (10.2)
There are mixed perspectives about UNHCR’s coordination role. This is most apparent in qualitative evidence. Graph 8 shows that while UN, NGO, and UNHCR respondents have mixed perspectives regarding UNHCR’s coordination role, donors and INGOs tend towards more negative comments.

When this qualitative evidence is analysed further, most negative impressions concern coordination with OCHA and UNHCR’s perceived “double/triple hatting” as implementer, coordinator, and funder. Donors are also particularly negative about the lack of involvement and strategy regarding the GoJ on key issues, including protection. INGOs furthermore comment negatively on the lack of a coherent regional strategy and on being excluded from RRP funding. In the RRP6, many of the INGOs were permitted to appeal on their own behalf & UNHCR Jordan developed a strategy to enhance NGO visibility for UN donor appeals. Yet, the negative comments and perceptions persist.

Although less strongly than in Lebanon, some stakeholders question UNHCR’s role as coordinator, funder and implementer and whether this presents conflicts of interest. Conversely, some argue that UNHCR’s roles as implementer and funder give it insights and experience that strengthen its coordination role. This Evaluation did not find any instances or even accusations of malfeasance or abuse of authority or power. Instead, people question the “double/triple hatting” rather than blatantly pointing to it as a problem. Therefore, these multiple roles are rather unlikely to have any tangible negative impact.

In Jordan, much of the coordination success is attributed to various personnel, from the Country Representatives to sector leads and others, and the robust Inter-agency Information Sharing Portal that stands as a model for online resources.

As qualitative evidence indicates, many stakeholders are satisfied with the Country Representative role, how information is shared, meetings are facilitated, and effective partnership and knowledge sharing are

![Qualitative Evidence: How does UNHCR strengthen the way it works with partners, national/local governments, and others to meet refugee protection and assistance needs? (EQ 6-4)](chart.png)

<table>
<thead>
<tr>
<th></th>
<th>UN</th>
<th>NGOs</th>
<th>UNHCR</th>
<th>Donors</th>
<th>INGOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Positive</td>
<td>44%</td>
<td>55%</td>
<td>25%</td>
<td>65%</td>
<td>14%</td>
</tr>
<tr>
<td>Negative</td>
<td>34%</td>
<td>15%</td>
<td>35%</td>
<td>10%</td>
<td>51%</td>
</tr>
</tbody>
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Graph 8
encouraged. Similar credit is given to the Deputy Country Representative and the Senior Inter-Agency Coordinator. This is certainly an important variable in the broader praise for inter-agency and inter-sector coordination.

While this indicates that most are satisfied with UNHCR’s coordination role, this should not diminish the frustration and exasperation associated with the wrangling of authority and power between UNHCR, OCHA, and, more recently, UNDP. Qualitative evidence highlights this as exceptionally negative regarding the time it has wasted and for the general conclusion that it has not resulted in any significant progress in how these different organizations should act in concert during humanitarian responses.

6.3.2 How effectively has UNHCR coordinated with OCHA, HCTs, the HC and the CRSF /country plans? (10.2.1)

The notion of coordination, especially during severe, large-scale emergencies (L3 Emergencies), is complicated and goes beyond the strict coordination methods that this question may imply. Existing IASC coordination architecture sets out the requirements for an L3 emergency but does not take into account UNHCR’s mandate. The UNHCR-OCHA agreement of 24 April 2014 works towards clarifying the responsibilities between OCHA and UNHCR, given its mandate. This agreement delineates responsibilities between UNHCR, the UNHCR representative, the Humanitarian Coordinator (HC), the Humanitarian Country Team (HCT), IASC and UNHCR clusters/sectors, around leadership, strategic planning, operational coordination, delivery resource mobilization, and advocacy. While this agreement clarifies roles—especially those related to refugees and internally displaced persons (IDPs)—it came late in the process and in the context of significant frustrations of the relevant parties on the ground. In Lebanon, this Evaluation concludes that more clarification is required. In Jordan, the definition of roles proved most pressing, and this has been largely resolved.

Yet, frustrations persist. This is due to the fact that ambiguity over the role of HC and HCT remains. This needs to be resolved with more precision at the level of IASC. In particular, the role of HC and HCT in a refugee emergency needs clarification. As a matter of fact, it was this ambiguity that underpinned the reported coordination tensions during 2012-2013. The CRSF process led by RHC and OCHA only increased these tensions since the core ambiguity was not resolved. (It was unclear why a Regional Humanitarian Coordinator was required and why ToR included macro-economic and development issues.) The on-going attempt led by the RC/HCs to put in place a One UN approach in Jordan and Lebanon is generating similar tensions for the same reasons.

This is amply illustrated by evidence from this Evaluation. Nearly every relevant respondent, when asked about UNHCR’s coordination role, commented negatively on how UNHCR, OCHA, HCT, and HC/RC coordinated at whatever level. Unfortunately, a great deal of this is reported as a “turf battle” among parties, a term used repeatedly by various respondents. Although these comments are often fairly far removed from the complications at the IASC, OCHA, UNHCR levels, they are symptomatic of the frustrations that many have with the way coordination has played out. (See section 6.3.1.)

At the same time, inter- and intra-sector coordination, somewhat beneath the fray associated with these other conflicts, has proven relatively successful. The coordination, management, and leadership of these sectors have worked well.

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85 Joint UNHCR – OCHA Note on Mixed Situations Coordination In Practice," UNHCR and OCHA, 24 April 2014.

86 This responds to evaluation question 10.2.3.
6.3.3 Does UNHCR promote partnership, help to promote synergies and avoid duplications, gaps and resource conflicts at the situational/regional, country and sector-specific levels? (10.1)

The primary mechanisms for promoting partnership and its benefits include the Regional Response Plan, the sector working groups (protection, food security, education, health, shelter and settlements, non-food items, WASH, and cash), and the inter-agency working groups. By and large, these work well. They have developed into primary forums for sharing knowledge and information, planning, and overall implementation.

However, qualitative data on this question tends towards negative perspectives. (Graph 10)

This illustrates that donors are significantly more negative on this point than the UN and UNHCR, although they tend towards the same perspective as INGO respondents. UN partners, rightly or wrongly, carry out most of the funded activities coordinated by UNHCR. The fact that UN organisations are slightly more positive in this regard than UNHCR signals significant effectiveness. Inter-agency coordination meetings, the sector working groups, and other forums where UNHCR promotes partnership, knowledge sharing, and synergies, are considered effective. While there have been challenges, nearly all respondents state that the ability to work in partnership has and continues to improve. As noted elsewhere, this will be further supported by rationalising/aligning targeting approaches and methods, and ensuring that available data is better leveraged for joint decision making.

While somewhat beyond the scope of this question, this and other data support findings that UNHCR could do better to engage, inform, and work in partnership with donors.

Section 6.5 describes particular issues in each of the relevant sectors.

6.3.4 Has UNHCR coordinated well with UNICEF and UNFPA in programmes targeting child protection and SGBV? (10.1.3; 7.5)

Protection-related coordination, ensured by the protection working group and the SGBV and child protection sub-working groups, is successful in many respects. Qualitative data indicate improvements in the level of coordination since the appointment last year of a senior protection coordinator to chair the sector working groups for SGBV and child protection.

The protection working group has contributed to strategizing and standardising protection work by developing inter-agency efforts, a range of documents, work plans and guidelines, in particular on SGBV and CP.87

The SGBV sub-working group, chaired by UNHCR and UNFPA is particularly active. It supports

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87 An excellent example are the 2013 Inter-agency emergency standard operating procedures for prevention and response to gender-based violence and child protection in Jordan.
mainstreaming gender issues by having a focal person in all other Sector Working Groups, and has given significant input to the set-up of Azraq camp.

UNHCR cooperation and coordination with UNFPA and UNICEF has been sustained and fruitful. Common efforts have enhanced credibility and success of advocacy efforts and made work with institutional counterparts more coherent and effective. There is evidence of this in the recent tri-partite agreement between UNHCR, UNICEF and MOSA, and the design of the Aman campaign for child protection.88

Though relations are, in the words of a respondent “not really a honeymoon”, with competition for leadership and patchy funding, UNHCR, UNFPA and UNICEF have developed ways to work together effectively towards common objectives. All respondents from the three organizations acknowledged this. The positive results achieved are obviously an incentive for further coordination and cooperation.

It should be pointed out that, from a field perspective, competition for leadership between UNICEF and UNHCR (mainly on issues other than protection, e.g. WASH) creates confusion and ambiguity and in some cases has delayed the response. These have been largely rectified, although this may indicate a need for closer collaboration and more frequent communication between Amman and direct field support.

Several respondents were very critical of UNHCR’s approach to coordination when it comes to issues which it considers and treats as its exclusive realm, in particular issues of access to territory and protection. They expressed uneasiness and frustration and what they perceive as UNHCR secrecy vis-à-vis its response to the shrinking protection space and its advocacy efforts with the GoJ. Some respondents openly questioned whether any advocacy in this respect is being done. This was perceived as a lack of transparency and diminishing the role of partners, namely disregarding the contribution that they can make to UNCHR advocacy efforts.

6.3.5 How effectively have different cash interventions by UNHCR and its partners been coordinated? Were they provided in an appropriate manner? (10.1.6; 15.2)

There seems to be a fairly convincing coordination around cash interventions, with strong leadership from UNHCR and substantial inputs from the cash working group co-chairs (CARE, then OXFAM). The cash working group collaboratively defines the minimum standards and the duration of assistance and is currently engaged in the revision of the vulnerability criteria in view of more effective targeting during the second half of 2014, e.g. the aid effectiveness project by ACAPS.

RRP6 estimates that 30,000 families will be in need of cash assistance in 2014, whether unconditional (mainly cash for rent and/or to compensate an estimated expenditure gap of 100-200JD for the most vulnerable families), or conditional (80JD/family/month for winterisation extended over 4 months). One-off cash assistance is also provided to extremely vulnerable families in certain circumstances, as well as a one-off back-to-school supplement for families with children at school.

The main challenges encountered (and affecting coordination and delivery) are:

- Improving coordination among partners;
- Developing a new approach for identifying vulnerability;
- Defining clear and transparent mechanisms for targeting; and
- Monitoring assistance against needs.

Some of these are described in the section on monitoring and targeting. (See section 6.10.3.)

6.3.6 What are the successes and on-going constraints associated with the Regional Response Plan (RRP) Process? (1.1.1)

The RRP process has evolved with the nature of the crisis, becoming more detailed, with stronger evidence and argumentation, in each iteration. In the case of Jordan, there are relatively clear links between analysis and objectives presented in RRP5 and those in RRP6, although these could be more explicit. For instance, the exposition regarding each sector tends to describe the successes and remaining challenges for each of the previous objectives without being explicit: the previous objectives are not listed or commented upon directly.

Qualitative evidence shows a trend towards more negative perspectives although this data remains decidedly mixed:

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26| 27| 28| 29| 30| 31| 32| 33| 34| 35| 36| 37| 38| 39| 40| 41| 42| 43| 44| 45| 46| 47| 48| 49| 50|
| 51| 52| 53| 54| 55| 56| 57| 58| 59| 60| 61| 62| 63| 64| 65| 66| 67| 68| 69| 70| 71| 72| 73| 74| 75|
| 76| 77| 78| 79| 80| 81| 82| 83| 84| 85| 86| 87| 88| 89| 90| 91| 92| 93| 94| 95| 96| 97| 98| 99| 100|
| 101| 102| 103| 104| 105| 106| 107| 108| 109| 110| 111| 112| 113| 114| 115| 116| 117| 118| 119| 120| 121| 122| 123| 124| 125|
| 126| 127| 128| 129| 130| 131| 132| 133| 134| 135| 136| 137| 138| 139| 140| 141| 142| 143| 144| 145| 146| 147| 148| 149| 150|
| 151| 152| 153| 154| 155| 156| 157| 158| 159| 160| 161| 162|

24% Positive 35% Negative

Graph 10

Negative comments tend to relate that the RRP is largely designed for UNHCR and other UN organisations. Some state that it lacks an effective regional and country-level strategy that could better guide activities. Over 60% of respondents state that the RRP improves coordination and appeals for funding (both 60%). Other elements had similarly mixed views, although there was a more positive trend overall. A majority of respondents in the post-field survey also state that RRP7 should include a resilience pillar. (Graph 11.)

The RRP engages diverse partners to identify needs and priorities, indicating successes and remaining challenges from the previous year, while costing the projected needs to facilitate donor community decision-making.

By engaging partners based on needs and priorities, it promotes a process that generates a list of needs. This is a long list given the exceptional needs of Syrian refugees. The needs then inspire the objectives, rather than the other way around. A good strategy would be to identify objectives first and then review different ways in which these objectives could be met, the resources and competencies available, and then—and only then—develop a list of priorities based on the needs of the refugees. Instead, the needs are presented first, with funding requirements that cannot be met, and then funding allocations are established based on incoming funding. The UNHCR Programme Unit does prioritise certain activities and sectors before funding arrives and uses this to ward against earmarking in lieu of funding of priorities and could be part of a more formal strategy.

This “needs first/objectives second” approach also leads to a change in the objectives in each RRP. A review of the objectives from RRP4-6 shows considerable change in the substance and breadth of objectives. (See
Annexes.) One may argue that the objectives shift because of the evolving nature of the crisis and the refugee’s growing/changing needs. This is obviously true, but it does not produce the best planning or strategy. If one’s primary goals keep changing, how can one ever be sure that one is moving in the right direction?89

This lack of strategic focus in the context of a multitude of objectives and needs makes effective prioritisation challenging. It becomes a negotiation between partners’ expressed needs rather than a clear delineation of whether or not specific activities will help UNHCR and its partners meet refugees’ protection and assistance needs. 90

This is made even more complicated by the other planning, assessment, and strategic documents and processes: UNHCR’s Results Framework, the Syria Needs Analysis Project (SNAP) led by ACAPS,91 the SHARP, and individual partner assessments and objectives,92 amongst others. This creates a context for humanitarian response that is unnecessarily complex and thus complicates effective decision-making, especially regarding resource allocation, financial or otherwise. This can lead to duplication and/or an imbalance in assistance activities. It is reactive rather than strategic.

Recommendation 4: Refine objectives for RRP7 or any successor programme to ensure that they are specific, measurable and achievable, and that they are sufficiently in line with the GoJ National Resilience Plan, while ensuring that refugees’ protection and assistance needs are addressed. With these strategic objectives in place, all sector level objectives should be clearly supportive of these broader objectives. While one may hope that there will be no need for further RRP processes, these objectives should be maintained and only changed when there is a clear and indisputable need to do so.93

This Evaluation recognises that moves are underway to ensure that the next RRP is in line with the Jordan National Resilience Plan and that it includes a possible resilience pillar. Most respondents regard this as necessary.94 However, this may simply broaden UNHCR’s role rather than prompt greater focus on how UNHCR provides the intellectual and strategic leadership to ensure that refugee protection and assistance needs are met.

6.3.7 What changes, if any, to UNHCR’s coordination role/arrangements should be envisaged going forward? (10.3)

Recommendation 5: UNHCR should develop a strategy to transition funding and activities that can be addressed effectively by the Government and other actors and that are more in line with the

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90 This responds to evaluation questions 1.1.2 and 4.1.1 regarding how UNHCR prioritises given actual resources.


92 As noted elsewhere, it is understandable that different partners conduct their own assessments and have objectives that are aligned with corporate frameworks and strategies, yet some assessments tend to be done for additional advocacy and resource mobilisation needs, again diluting and complicating the nature of the response in the recent past and future.

93 This is the primary way that the RRP process should be changed/adapted, corresponding to evaluation question 1.1.3.

94 The post-field phase survey asked whether a resilience pillar should be included in the next RRP. 78% of Jordan-based respondents said yes. See post-field phase survey results included as a separate Annex.
**Government’s National Resilience Plan.** This can only be successfully done once assured medium-term funding is in place for key sectors, like health and education.

This is not meant to dispute UNHCR’s mandate and how this includes “core” and “non-core” assistance. Yet, one wonders whether a lack of focus and specificity about what UNHCR can do best to ensure the protection and assistance needs of refugees also means that UNHCR can spread itself so thin as to a) diminish the “quality” of how these needs are met; b) diminish the opportunities for other actors, including government to step in and so to exasperate long-term displacement; c) increase the arrogance and ‘turf’ battles that ensue when there are so many resources available; and d) all of the above.

Instead of bringing the argument to the mandate and GA Resolution level, claiming that if it has to do with refugees, UNHCR should be involved, UNHCR could be better placed to provide the strategic and intellectual depth for other actors to use their core competencies and approaches, and eventual leadership to meet the needs of refugees in specific areas. In fact, this would also allow UNHCR to focus more on protection, a core issue and one for which few other actors would have the depth of experience, let alone mandate.

While UNHCR has traditionally coordinated such sectors and activities, the scale of the response in Jordan and the direct development needs of the Government require a revised and more focused approach. This revised focus should go further, be more strategic, and better coordinated than initial efforts to align RRP6 activities with the GoJ National Resilience Plan. 95

**There are several lessons** that UNHCR can lean from the coordination experience in Jordan and the Syria response overall.

- **UNHCR has established an effective coordination model for humanitarian crises that involve large numbers of refugees.** This includes the successful adoption of multiple roles, including funder, coordinator, and implementer. This has been supported in Jordan by an effective inter-agency coordination model and the way in which sector leadership has evolved. The Inter-agency Information Sharing Portal, Activity Info, and RAIS, amongst other innovations and technologies, enhance knowledge sharing and decision-making. The final “proof of concept” for this model includes how UNHCR devolves authority and leadership in key sectors and transitions towards discrete assistance and protection requirements.

- **The use of information and communication technology allows for a much more nimble and systemic approach of how different organisations coordinate, manage resources, and share knowledge.** This can lead to less rigidity and formality in how roles and responsibilities are designated prior to any crisis and instead provide an easily accessible online platform where different partners can converge and diverge according to issues and needs. 96

### 6.4 Durable Solutions

*While durable solutions are somewhat premature given the response’s trajectory and the issues that relate to resettlement, the Evaluation processed two questions relevant to longer-term strategies and planning.*

95 The Dead Sea Workshop to finalise the NRP on 9-10 March included opportunities for UNHCR to “consult with each task force/reference group and agree which project should be retained under the NRP and RRP respectively.” However, this was done without a broader strategy to define clear objectives, tactics, scenarios and risks for how these can be met, and then mirroring this analysis against realistic resource appraisals, amongst other strategic considerations.

6.4.1 Does UNHCR’s current strategy (RPP6) adequately address durable solutions in the context of Jordan? (9.1)

RRP6 mostly addresses short-term needs. The RRP6 Mid-term Review does not address durable solutions adequately. Out of 10 inter-sector priorities in RRP6, only one targets host communities per se, and another the Jordanian economy at large.97 The other inter-sector priorities focus on refugee well-being. This may be appropriate given the pace and complexity of the crisis and response. It may also be less of a concern if UNHCR transitions the response to other actors while focusing on core competencies.

For more on this question, see Section 6.6.1.

6.4.2 What links have been established that encourage the eventual absorption of humanitarian interventions into longer-term national programmes? (9.2)

The Jordanian Government has recently published a National Resilience Plan (NRP).98 This stands as the Government’s best effort to date to develop a list of priorities and needs related to the burgeoning refugee crisis and its impact on an array of social and other services as well as the broader economy. Going forward, this should serve as the cornerstone to development activities, polices, and investments, as well as durable solutions for the refugees.

At the same time the NRP does not address refugees specifically. UNHCR has the mandate regarding refugees, and so this is appropriate—yet the issues that the NRP promotes have a direct bearing on refugees’ protection and assistance needs. It treats the needs in education and health, for instance, sectors from which refugees receive important assistance.

UNHCR is already engaged in the NRP to ensure that refugees’ needs are addressed. At the same time, there is little evidence that there is an articulated strategy that guides UNHCR as it engages with the government. Similar to the coordination confusion between the IASC, OCHA and UNHCR on emergency response and the role of UNHCR in meeting refugees’ needs (See section 6.3.2.), some of these issues could have been addressed earlier. While the complications of any emergency situation are complex, UNHCR could strengthen the ways in which it both ensures access, protection and assistance while thinking about longer-term issues with host governments. These are not separate issues but integral to how UNHCR achieves its mandate. If the focus is on protection and assistance needs, then the response can seem reactive and miss opportunities that can emerge from more holistic analysis.

There are several factors that have constrained work towards absorbing humanitarian interventions into longer-term national programmes:

1. The scale and pace of the crisis is difficult, if not impossible, to predict. This has led to the largely reactive nature of the international community’s response. As noted elsewhere, this could be mitigated against thoroughly standardised methods for strategic planning and execution that are both adaptive and governed by a strict adherence to static objectives, e.g. UNHCR’s mandate to ensure refugees’ protection and assistance needs.

97 Inter-sector priority 6 is meant to increase the number and scope of community-level projects that benefit Jordanians in areas with high concentrations of refugees, together with greater investment in shared services (education, health, WASH) with the aim to reduce tensions and maintain protection space in Jordan/ Inter-sector priority 7 supports the Jordanian economy by channelling short-term (or humanitarian) assistance through existing productive and marketing structures.

2. The Jordanian government has been cautious in accepting that this crisis would cause the need for a shift in long-term development plans. This has thwarted more active discussions about how to link on-going activities and services with longer-term national programmes.

At the same time, the entrance of the World Bank, UNDP and others presents ample opportunity to draw on existing work and to forge links between humanitarian actions and development. UNHCR’s registration process and the huge data stores it has managed also provide datasets for the analysis of economic and social impacts in Jordan and how any development response can best address them. While these datasets are not perfect for macro/micro economic trend analysis and other research, they do provide a sufficient foundation for further work.

**Recommendation 6:** UNHCR should build on the relationship it has developed with the World Bank by developing standard metrics, database structures, and business processes for the collection and analysis of economic data. This would establish data-rich analytical links between UNHCR’s humanitarian response and shifts towards resilience and development. This should be a fundamental aspect of UNHCR’s response in any context. With this in mind, UNHCR should invest in an economic/statistics unit at the corporate level that would support corporate structures, guidelines and policies for the collection and analysis of such data. Formalising an economic/statistics unit would also ensure that UNHCR develops statistical databases and other datasets that can serve its needs as amply as others. (Section 6.4.2.)

UNHCR should also continue to support local economic recovery models, like that of ILO, and UNDP’s Local Economic Development model. Most relevant respondents considered the latter a promising approach and saw it as having benefitted from good partnership between UNHCR and UNDP. The Local Economic Development Model should increase its focus on the three poorest governorates in the north where 52% of the refugees are located: Mafraq, Irbid and Zarqa. These governorates were traditionally left out from development activities even before the onset of the Syria crisis. Without comprehensive solutions, they, perhaps more than others, are at risk of social unrest.\textsuperscript{99}

6.5 Sector Analysis

The following sections treat food, cash, shelter, water and sanitation, health, education and livelihoods. These are generally organized according to OECD DAC Evaluation levels although the analysis, at times, cuts-across these levels. This enables a more coherent and appropriate approach for each of these. Effectiveness, coverage, appropriateness, efficiency, and impact are addressed in the following section.

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\textsuperscript{99} For a troubling example, see: https://www.youtube.com/watch?v=PFlHwcbNgo.
6.5.1 Overall
The sectors represent various levels of complexity and challenges, be they in how sector activities are organised with diverse partners, the role of the GoJ or related to the complexity of refugees’ actual needs. This is reflected in the qualitative data from the diverse respondents interviewed as part of this Evaluation. (Graph 12). While the comments and issues noted in this data represent the range of issues, they do indicate some common consensus about the overall effectiveness of each. Highlights from this analysis include:

- Respondents from all cohorts (UNHCR staff, UN organisations, INGOs, local NGOs, and donors) were positive about the use and mechanisms for distributing cash and food.
- Community and livelihoods were more negative mostly due to the complexities of meeting the needs of refugees in non-camp settings and the inherent limitations on employment amongst refugees in Jordan.
- Core relief items (NFI) and WASH tended to be more negative, although further analysis shows that there has been considerable success in these sectors as well.
- Health, as described in 6.5.8, is exceptionally complex, and the negative and positive comments address the range of issues associated with this.
- As Graph 12 illustrates, only 41% of responses for Education were either positive or negative, indicating that 59% were neutral. This indicates that most comments corresponded to issues about education programming, the strain on the Jordanian education system, and the need for some curriculum adaptations.

The sections below address some of the key issues that arose during this Evaluation for each sector. This is not meant to be exhaustive: it merely highlights issues that may be considered in the future, and specific recommendations as warranted.

6.5.2 Shelter
A review of UNHCR documents regarding achievements and challenges, including, but not limited to, RRP6 and the 2013 Final Report for RRP5, indicated there was sufficient technical expertise to coordinate and implement shelter activities. The Household survey shows where respondents received shelter. (Graph 14.)

The shelter objectives in the camps have been met, and the shelter sector conforms to SPHERE standards. There is in Za‘atari a significant difference between districts in the percentages of shelter type. The differing proportions of new arrivals in the various districts largely explains this. For example, in districts 1, 2 and 3, which are all part of the “Old Camp,” shelters are caravans in 95%, 94.5% and 85% of the cases.

Graph 12

This responds to evaluation question 10.1.1.
respective, with only 522 tents found throughout these three districts. Conversely, in District 8, which recently filled up with newly arrived refugees, 992 tents were found, compared to only 1,125 caravans (53.1%). There were other issues regarding the supply and distribution of caravans in Za’atari, with promises of caravans being made available to all refugees proving premature.

Shelter remains a challenge for refugees living outside the camps. A shift in the GoJ’s policy towards informal tented settlements (ITS) in early January 2014 resulted in several rounds of evictions, which, in turn, led to multiple displacements and the effective exclusion of ITS from common response strategies. The situation is compounded by the exponential growth in the number of settlements observed by aid workers, although the total number of ITS inhabitants accounted for only 1.16% of the refugee population in Jordan at the time of this Evaluation.

Outside the camps, the majority of refugees (90%) rent accommodation. Out of these households, one-fifth live in substandard accommodation, such as emergency or temporary shelters, with large variations across governorates. Cases of Syrians living in basements and tents were reported in each governorate. In Irbid, accommodation was found to be generally better but the average number of persons per room and rents overall were high. The poorest accommodation conditions were found in Mafraq, with 12% living in tents or informal dwellings. These informal settlements are also found in Balqa, Irbid and Zarqa. Refugees living in these settlements are vulnerable to reduced access to basic services. For instance, the majority of children do not attend school and there are issues regarding water quality.

According to two sample surveys, respondents living in temporary structures were in exceptionally poor-quality housing and were of particular concern. Forty per cent of shelters have roofs with signs of moisture and 10% have damaged/collapsed roofs or cracks. More than half of them have poor or very poor flooring, and a third have inadequate roofing.

Eighty per cent of refugees interviewed for the sample survey said that their shelter was not insulated or good enough to provide protection against moisture; many of them said that their roof was not waterproof. Half of them said they needed doors.

6.5.3 Za’atari: Urban Vision, New Aid Modality, or Both?
The Head of the UNHCR Sub-Office for the Za’atari refugee camp is pursuing an urban development vision for the camp. This is based on urban service delivery models that reflect emerging and dynamic social and economic needs while increasing basic infrastructure services, including energy, transport, waste disposal and water management. The “vision” includes a refugee led camp administration, divided by

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101 This section responds to questions 1.2.4. – 1.2.6.
102 See HH Survey results as part of the Data & Analysis report.
103 The Evaluation focuses on the Head of the Sub Office as it was not clear if the “vision” he expressed was fully endorsed and supported by UNHCR, as noted in this section.
districts, and with representation included in camp-level committees. This is nothing short of an urban development model that would facilitate Za’atari emerging as a “population centre,” or, more specifically, a city.\(^\text{104}\)

As compelling as it may be, and given the distinct focus on refugees’ benefit and dignity, the urban vision for Za’atari is misplaced. First of all, the status of the camp and its administrative status are within the sole purview of the GoJ, not UNHCR’s. In fact, a striking aspect of the “vision” articulated by the Head of the UNHCR Sub-Office is that it is unclear how and where the GoJ is involved.

Importantly, Za’atari is not a village or an emerging city. It is a refugee camp and, as such, the dream and vision of the people there will always be to leave it. The same is true of Palestinian refugee camps that have ‘urbanised’ and seeped into the broader civic environment. As long as they are there, and regardless of how urban the space may become, the people’s vision will remain focused on returning home.

This urban vision runs alongside this reality. The vision, led by Head of the UNHCR Sub-Office, is compelling and thoughtful, but ignores the dynamics of refugee populations. It is also not clear how aligned this is with UNHCR priorities and polices let alone with the GoJ with which authority for any such vision ultimately resides. Nonetheless, it is clear that refugees don’t necessarily want a new city—they want to go home. Given the chance, even the most committed refugees will leave the camp when possible, whether through bailouts to friends and family in Jordan or elsewhere. Most already do. The camp at the time of this report had approximately 86,000 individuals, 120,000 at its peak, and yet over \(\frac{3}{4}\) million have come and gone.\(^\text{105}\) This will always temper their support, actively or not, of an urban strategy.

The urban vision is a challenge to traditional aid modalities. Instead of doing ‘for’ and ‘to’ refugees, it concerns what people say they actually need, and the emerging human structures that people use to organise and structure how, when and if they manoeuvre in public. The vision is about working with refugees to create structures, systems and opportunities to lessen the burden and pain associated with their loss, the loss of their home, and the exceptionally complicated and cloudy visions of how they want to go home. These aspects are to be lauded and the participation of refugees in decision-making and camp development should continue and increase.

This vision has taken hold, one can easily presume, given the Head of the UNHCR Sub-Office’s forceful and compelling leadership and the relatively “free hand” he has had in pursuing it. He was brought in to fix some of the dire problems and unrest that were plaguing the camp in late 2012. He did this and more. He enlists the help of celebrities, corporations, and others in technical and material support. He talks (seemingly freely) to the international press and advocates for his vision in influential forums like TED Talks. He has done this partly out of exasperation and partly because he can. His exasperation stems from the dearth of resources he has been provided with, especially in staffing, and in the lengthy and complicated decision-making processes within UNHCR, which he largely avoids. He acts as a highly experienced, committed, and aggressive entrepreneur, there to act upon the vision he has for the camp and the refugees it serves. His bombast, whether directed at emergent camp leaders who respond and respect his “forceful leader” approach or at those who challenge his vision or its broader value, belies his ostensible independence. This makes it very difficult to un-pack when he states that he is the “Mayor” of Za’atari.\(^\text{106}\) Is he? Or, is he a UNHCR staff member who uses this rhetoric to pursue objectives?

This Evaluation could not ascertain how much of the Head of the UNHCR Sub-Office’s actions are formally or informally approved by UNHCR or aligned with the GoJ. Whether sanctioned or not, this vision is a bold

\(^{104}\) “Achieving the Vision. (A draft vision for the Za’atari refugee camp.)” UNHCR. Version 6, April 2014.

\(^{105}\) Analysis of Za’atari population figures, Inter-Agency Information Sharing Portal.

experiment to see if a refugee-centred, participatory, urban vision for camp management can become a new modality. If UNHCR has cautiously, and perhaps informally, allowed this experiment to reach this point, then it should strengthen support for the vision.

**Recommendation 7:** In coordination with the GoJ, develop a strategy for Za’atari that considers current activities and the “vision” put forward by the Head of the UNHCR Sub-Office. If the current vision is to be pursued, the Head of the UNHCR Sub-Office needs more resources to meet the needs of the refugees as they emerge and evolve as part of the vision put forward for the camps’ development. Yet, UNHCR is quite aware that any such vision cannot exist in a vacuum. It is within the purview of the GoJ to decide the camp’s current and eventual administrative status. At the time of this evaluation, it seems that the “vision” may not be fully aligned with the GoJ or even UNHCR.

The Head of the UNHCR Sub-office has also approached various private organisations for in-kind donations. UNHCR should be more diligent and mindful of any corporate support, be it material, technical, or otherwise, that the Head of the UNHCR Sub-Office solicits from private organisations. These businesses will have specific interests, and these should be fully understood and vetted before any deal is approved. At the same time, the outreach to different sponsors should not be discouraged. This type of direct investment in time, know-how, or resources, is invaluable, and the fact that a seemingly large and impressive number of corporations and others have invested is testament to this form of resource mobilisation.

### 6.5.4 Water & Sanitation

In the camps, WASH objectives have been met. WASH services cover the entire population, ensuring that all refugees receive a minimum of 20 litres a day, have access to appropriate sanitation facilities, and are able to practice good hygiene.

This has not been without considerable problems, especially regarding distribution of water, water wastage, environmental degradation, and other challenges. UNICEF, as lead on WASH in the camps, could have done better to plan for and address these issues earlier but it instead focused on immediate needs and on alleviating the tensions and conflicts that emerged around water in particular. This is confirmed in the household survey:

![Graph 14](image)

**Graph 14**

UNICEF are leading WASH interventions and undertaking all WASH activities in the camps. They are coordinating the sector based on needs assessments. UNHCR has advocated for better water distribution

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107 This responds to evaluation question 10.1.2.
monitoring considering the disparities in the amount provided across Za’atari camp, and pushed for a sustainable strategy for wastewater management and solid waste management.

From the opening of Za’atari camp, UNHCR has vehemently advocated to the WASH sector lead for implementation of UNHCR Emergency Handbook standards. The Handbook recommends a consultative, participatory approach to design of facilities. Importantly, the Handbook recommends safe, hygienic household based WASH facilities which result in high user ownership (therefore better/cheaper maintenance) and addresses the considerable safety, protection issues associated with current rejection by the refugees of communal WASH facilities. UNHCR is not the Sector Lead or Co-lead, but as Camp Management it has strongly advocated on these points.

There were other constraints to achieving best WASH practices. The implementation of relatively simple, fast, inexpensive and effective (sustainable) solutions such as simple on-site wastewater treatment solutions (for reuse for agriculture/landscaping according to Standards) were rejected by the Ministry of Water and Irrigation despite significant health and environmental risks associated with household wastewater disposal and scientific evidence indicating very little risk of contamination of 200 m deep drinking water aquifer.

Despite this, WASH standards are generally above SPHERE standards as UNICEF is providing water for 110,000 registered refugees, while there are only around 80,000 in Za’atari at the moment. Yet, this is also related to the agreed upon need of 35 litres per day per person, an agreed upon standard adjusted upwards from the SPHERE standard of 20 litres. So whole the provision numbers may not reflect the actual number of people served, the actual per litre per day allocation is correct.

During the field visit to Azraq camp, it was noted that UNHCR and UNICEF site planners had developed small plots of six shelter units (maximum) per WASH facility to allow families and people from the same areas to be hosted together. Unlike in Za’atari, refugees in Azraq will therefore not share communal latrines. In Za’atari, according to a UNHCR WASH associate and observed by consultants, refugees have taken the ‘WASH situation’ in their own hands and have dismantled and moved WASH facilities to their own shelters.

There are stark differences between Za’atari and Azraq. Za’atari refugee camp was opened 12 days after the decision by the government instructing the opening of Za’atari refugee camp. With between 700 and 3,000 arrivals per day between 29 July 2012 and June 2013 the WASH sector was always in emergency phase response. Prior to the planning of Azraq refugee camp, an inter-agency and inter-sector “Lessons Learnt” discussion led to the site planning for Azraq refugee camp with 12 months from commencement of planning to opening of the camp. Despite, the agreed outcomes of the “Lessons Learnt” discussions, the WASH sector lead, UNICEF, proceeded to implement communal facilities although at a lower person: facility ratio than at the Za’atari refugee camp.

The WASH sector is in the process of addressing the needs of the most vulnerable refugees in both camps. For example, one of the challenges that the WASH sector is facing is that a high proportion of Syrian women and children in Za’atari camp do not feel safe using WASH facilities in the camp at night. 82% of women, 28% of teenage girls, and 39% of boys and girls under the age of 12 fear harassment on the way to and from the facilities. This has been addressed through installing solar lighting by UNHCR.

Vulnerable refugees have sufficient access to safe water and latrines with special facilities being put in place for the disabled. The latrines are also in the process of being segregated for men and women. However, in Za’atari, refugees have installed their own and private WASH facilities near their shelter. Due

108 “Minimum Standards for Za’atari WASH Sector”
http://data.unhcr.org/syrianrefugees/documents.php?page=1&view=grid&WG%5B%5D=18)
to cultural norms, it is difficult for women and girls to make use of the communal ones.

The Za‘atari refugee community has demonstrated a strong preference for undertaking many activities planned for communal facilities at the household level, including preparing food, washing clothes, bathing and use of latrines. Infrastructure to support these activities at the household level has been developed by members of the camp community, independent of support or regulation from the WASH Sector. Although currently unsupported and unregulated, this continuing trend for private facilities is driving and defining many of the planned infrastructure projects, such as the wastewater collection network project and household connections project. The sector is actively working towards maintaining safe and hygienic environmental conditions and services linked to the development of private facilities.

Water demands are growing as some residents procure their own water storage tanks and other water-intensive appliances, such as washing machines. This has led to a number of complaints by refugees over unfair distribution and attempts to increase aid agency oversight at water distribution points. UNICEF estimates that actual demand for water in the camp may be nearly twice as high as the 3.8 million litres currently supplied to the camp each day. A REACH assessment showed that 36% of refugees in Za‘atari highlighted the need for WASH improvements as the top priority over other sectorial assistance. While the need for maintenance of WASH facilities was identified, the governance and management of water resources is also a likely key issue contributing to dissatisfaction.

For refugees living outside camps, there are various factors that influence their access to water, including geographic location, type of shelter, water delivery and storage capacity, and the local network of vendors and neighbours. UNHCR and IRD report that over 92.5% of households live in apartments and 1.6% live in basements. Another 2.7% and 1.4% are reported to be living in tents and prefabs. The worst off are refugees in informal tented settlements. Even in apartment buildings connected to government grids, there is insufficient delivery of water, especially in the summer months. This problem predates the arrival of Syrian refugees but has gotten worse since the increase in population.

In April 2014, REACH conducted a multi-sector assessment of Syrian refugee households in ITS across the governorates of Ajloun, Al Balqa, Al Karak, Al Mafraq and Irbid. Despite considerable stabilisation efforts by the humanitarian community, a steady influx of Syrian refugees into both camps and host communities continues to challenge humanitarian actors.

Between December 2013 and April 2014, the total assessed ITS population increased by 113.2%, to 7,028 individuals or 1.16% of the refugee population. Overall, this assessment covered a total of 87 informal settlements representing a three-fold increase in the number of settlements identified to date. WASH infrastructure and service provision was found to be severely inadequate across all assessed settlements. A small proportion (12%, or a total of 11 settlements) was found to have no access to latrines within the settlement. Across all assessed settlements, 57% of households (or a total of 666) reported no access to private or communal latrines, which points to a potentially high incidence of open defecation across all assessed governorates.

6.5.5 Food

In the absence of clear livelihood opportunities, food assistance is essential. For the most vulnerable part of the population, UNHCR and WFP continue to meet life-saving needs in this sector.

110 This responds to evaluation question 1.2.2.
111 This responds to evaluation question 1.2.1.
Blanket food assistance is extended by WFP to 98% of registered refugees but will be revised in the second half of 2014. The RRP6 mid-term review indicates that 85% of all registered refugees will struggle to meet their food requirements if not provided with food assistance. In response, there are actions by UNHCR, WFP and others to develop multi-sectorial, gender-mainstreamed targeting and selection criteria to move from blanket assistance to targeted distribution for the most vulnerable refugees living in host communities, while taking into account the unique needs of women, girls, boys and men.

The home expenditure gap was established at 107 JD through an extensive impact study conducted by CARE. This is met mostly through negative coping mechanisms around food (quantity, diversity, frequency) as the absolute priority for most is shelter followed by health. According to the home visits data finding of the “Syrian Living Outside Camps in Jordan” completed in October 2013, 58% of the expenditure goes to rent, and 26% to food (as a top-up to the food purchased through the WFP vouchers).

UNHCR and WFP coordinate closely, as the data (registration, geographic distribution, status) is transmitted from UNHCR to WFP. WFP carries regular on-site and post-distribution monitoring (household and participating shops), including price monitoring of a typical food basket. Food prices have stabilized and even decreased by 3% over 2013-2014.

As with cash, most food security monitoring is process- and output-based. WFP highlights that the move from cooked hot meals to dry food rations to paper vouchers and currently to e-vouchers have all been developed based on monitoring and feedback from the refugee population. For example, recent evidence suggests that beneficiaries prefer to go to shops on a regular basis given limited food storage capacity. This is made possible by e-vouchers while paper vouchers are redeemed all at once. The move from paper vouchers to e-cards was also highly praised as it reduces the waiting and transportation burden. A comparative study of the relative cost of each modality is not available.

In April 2014, WFP released an economic impact study entitled “Direct and Indirect impact of the WFP food voucher program in Jordan”, which indicates that food assistance will amount to 0.7% of Jordanian GDP in 2014 and contribute directly or indirectly to the creation of up to 400 jobs and USD$7.5 million in annual wages.

Deterioration of food security inside Syria (in terms of availability, access and utilization) has resulted in new refugees showing a poorer nutritional condition on arrival. Food safety and food quality are also compromised by the unofficial border crossings of agricultural and livestock products between Syria and Jordan, leading to an increased risk of trans-boundary animal diseases and pests.

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115 IBID; page 10.

6.5.6 **Cash: Pushing the Boundaries of Financial Assistance**

Cash Sector partners provide three types of cash assistance depending on the particular profile of a beneficiary family:

- Regular monthly cash assistance or time-bound monthly assistance;
- One-off or staggered urgent cash assistance to address a specific financial shock or need that is not covered by other forms of available assistance (medical, legal, protection, etc.); and,
- Seasonal or specific assistance including winterisation support or support for new arrivals.

As reported in various surveys and corroborated by the household survey, financial assistance is cited as the most urgent need:

**Graph 15**

Cash sector partners claim that cash, as a modality for providing assistance, is a flexible and responsive means to augment the work of other sectors. It also provides supplementary assistance to the most vulnerable by addressing additional needs not covered by other forms of assistance/sectors. The cash sector has had significant influence on other sectors and serves as an important reference and critical advisory point on urban programming for all sectors.

The use of direct cash assistance is recognised as a more dignified and respectful way of supporting refugees and others in need who have access to local markets and who have the knowledge and financial literacy to manage cash disbursements. UNHCR and its partners, especially WFP, have enhanced this form of assistance in Jordan and are reaching a technical development level that illustrates key advantages and disadvantages.

The scale of the operation also provides sufficient evidence to assess the perceived and real efficiencies that can be realised through direct cash assistance. These indicate that, in a protracted crisis, there may be real cost savings, while in crises lasting less than a year to 18 months, these cost savings may be minimal.

The scale of cash assistance and the use of commercially-provided bank cards also points out the rising commercial value of this approach. The advantage for participating banks is considerable, yet evidence suggests that UNHCR and WFP could do better in negotiating reasonable terms with these banks, ensuring that pricing remains competitive over time and that banks provide appropriate support and customer

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117 This responds to evaluation question 1.2.14.
service to refugees. UNHCR could increase its commercial prowess in negotiating terms and conditions with commercial banks while ensuring that there is a coherent strategy between participating organisations, mainly UNHCR and WFP.

Finally, UNHCR and WFP are actively exploring possibilities of leveraging these and other innovations, especially the IRIS guard technology, cash transfers, online employment and education opportunities, to name but a few, towards improved services to refugees.

Cash assistance is a primary source of income for Syrian refugees, in addition to personal savings, remittances, and informal labour. The most challenging expense is rent: various studies have shown that it represents by far the largest expense. As the crisis goes on, the income-versus-expenditure gap, caused by limited livelihood opportunities and rising rent, food and service prices, has increased the use of negative coping mechanisms, as described below.118

From a cash perspective, food assistance is taken care of by WFP with blanket assistance reaching upwards of 98% of refugees.119 Unconditional cash is rolled out to around 21,000 households, with 7,000 households approved but currently on hold due to the lack (or uncertainty) of funding. Most of these families have comparable degrees of vulnerability, so prioritization and targeting are seemingly based on availability of resources rather than on the severity of the vulnerability.

Post-distribution monitoring is done on a regular basis by WFP for food, and by UNHCR for unconditional cash. OXFAM, CARE, Save the Children and INTERSOS also produce impact studies, yet the indicators used there appear to be largely output- rather than outcome-based. The Cash Working Group is now working on a common post-distribution M&E tool to allow room for comparison in addition to aggregation. This should become operational in the second half of 2014.

Indicators focus mostly on the use of unconditional cash transfers. For example, a study conducted by Save the Children on an unconditional programme that ran between June and December 2013 reveals that the greatest percentage of respondents use cash for rent (73%) followed by food (33%).120 This implies that shelter is the most common “unconditional need” and that many continue to use unconditional cash transfers for food beyond that supported by WFP.

The impact of cash assistance on Syrian households in host communities and Informal Tented Settlements (ITS) provided by OXFAM confirms the positive impact of cash assistance for rent, debt repayment, utilities, household appliances, medical care for children, clothing, school fees and food beyond what is covered by WFP vouchers.121 This study also indicates that cash assistance improves social networks by allowing people to pay back loans from family, neighbours, and landlords, thus reducing familial and community tension. At the same time, the fact that Syrian refugees are receiving cash assistance while residing in otherwise impoverished communities is contributing to tensions with host communities. As the same report states:

> While the cash transfer programme has undoubtedly contributed to social cohesion among the beneficiary families’ close relatives, friends and Jordanian

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118 This responds to evaluation question 15.3.
119 This figure changes and has changed even during the time of this Evaluation although remains high and toward total coverage. For current figures, please refer to data and information available on the UNHCR Inter-Agency Information Sharing Portal.
contacts, it also seems to have inadvertently fuelled tensions between Jordanians and Syrians and, in a few cases, among refugees themselves.122

CARE also released a report entitled “Lives Unseen: Urban Syrian Refugees and Jordanian Host Communities: Three Years into the Syria Crisis” in April 2014.123 This includes a 32% sample of Jordanian households referred by CARE to the Jordanian Ministry of Social Development. This report shows that there are various negative coping mechanisms used to meet basic needs. These include:

- **Debt:** Over 89% of surveyed households borrowed money from relatives or neighbours, delaying rental payments, or buying on credit from shops.
- **Income:** Finding work is constrained by Jordan’s legal system, and so data in this area is difficult to obtain. It is clear that many refugees seek work and some find it.
- **Community:** 22% of respondents state that they receive assistance from family and neighbours, be they Syrian or Jordanian.
- **Child labour:** If children do not attend school, households often rely on them, especially teenage boys, to contribute to their income.
- **Selling Assets:** Depleting financial resources and selling assets brought from Syria reduce refugees’ ability to cope with potential financial shocks and overall resilience.
- **Selling Vouchers and NFIs:** Selling food vouchers or non-food items received from humanitarian organizations, with considerable loss in transactions.
- **Marriage:** Accepting marriage proposals for financial compensation/increased economic security.
- **Discount Purchases:** Buying second-hand items, lower-quality items, or multi-packs from large stores.

These and other coping strategies indicate how vital cash assistance is to refugees. At the same time, this same analysis indicates that cash assistance does not meet all needs. As the report states: “85% of the Syrian households interviewed state they needed support they could not find, typically financial support to cover rent as well as medical treatment/medication.”124

This gap is confirmed through additional analysis. While the objectives of seasonal cash distributions have been largely met, those for unconditional cash disbursements are on hold pending further funding. Out of the 28,000 households that are approved for unconditional cash assistance, 7,000 households are on hold, although highly in need.

Both UNHCR and WFP are preparing for increasing challenges in 2015. UNHCR is moving towards a common vulnerability framework, and substantive work has been done by the Assessment Capacities Project (ACAPS) in collaboration with UNHCR to review vulnerability analysis approaches in health programming in Za’atari, and cash assistance in urban settings. The result is a new proposed vulnerability analysis framework for Syrian Refugees in Jordan. The two main suggested amendments are: i) to remove the weighting currently applied, which is mandate driven, and ii) to distinguish vulnerability dimensions from specific need categories.

122 IBID; page 20.
124 IBID; page 55.
The 2014 Cash Working Group Strategy focuses on the development of common monitoring and evaluating tools, coordination of need assessments, common vulnerability criteria, joint advocacy messages, and good practice in the targeting of assistance for Jordanians.

Better harmonization between UNHCR and WFP programmes would support cash assistance overall. UNHCR has advanced technology in the use of the IRIS scanning, and the technical infrastructure in Jordan makes it possible to rely more on the IRIS scan technique. This would lead to reduced duplication, fraud, and administration/renewal.

Start-up costs seem minimal, at least based on the assessment of Cairo Amman Bank that collaborated with UNHCR on the introduction of IRIS scan. It is in their interest. IRIS has been a flagship tool for the bank since 2008—and one of the leading IRIS development companies, IrisGuard, is based in Jordan.

Finally, WFP has done extensive examination of the cost effectiveness for cash assistance. In their estimation, in-kind assistance is actually less expensive, because of the bulk procurement methods and human resources involved. For instance, with standard in-kind distributions, staff are relatively low-skilled and therefore inexpensive compared to database managers, financial managers, and other staff.  

A recent WFP report provides analysis of the economic impact of the voucher programme in Jordan. This indicates that there is an impact on different agricultural sectors based on total food consumption and price changes. While the report concludes that Jordan does not face shortages, there is a direct impact on prices and this will have effects on the broader economy and may impact social cohesion.

Key respondents, especially at WFP, indicate that cash assistance, either through vouchers, cards, or other electronic means, is more costly than direct material assistance. While this level of detailed cost analysis was not available for this Evaluation it was explained that this is due to start-up costs associated with cash assistance (commercial terms, financial management, database links between organisations and the commercial banks, amongst others) and the higher labour costs (more international

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125 This responds to evaluation question 15.1.
Beyond Humanitarian Assistance?
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staff, database managers, financial management experts as compared to mostly general service labour in direct material assistance).

Basic analysis indicates that most of the additional labour cost associated with cash assistance could be associated with start-up, business process engineering, and database management. These expenses should drop over time as systems are established and related transaction cost goes down. This presents an opportunity that, over time, cash assistance will become less expensive than direct material assistance.

As the two Scenarios in Graph 16 illustrate, costs for cash assistance should go down over time. The test is whether they can fall below those associated with direct material assistance (Scenario 1) or will remain higher than direct assistance, irrespective of any efficiency gains and cost savings.

Unfortunately, this level of analysis was not available for this Evaluation, and so it is unclear which scenario may be possible. However, this type of analysis is essential for determining the efficiency and cost implications of cash assistance. This analysis would enable organisations to calculate when a potential return on investment, or reasonable cost efficiencies could be gained, i.e. to demonstrate that cash assistance is not only better for refugees but also more cost-efficient than direct material assistance.

If the first scenario is possible, then participating organisations (UNHCR, WFP, et. al.) would need to devote considerable management expertise and attention to ensuring that efficiencies and other gains are made, which could allow for a potential return on investment over time, e.g. to demonstrate that cash assistance is not only better for refugees but also more cost-efficient than direct material assistance.

Scenario 1 seems to be the case in Jordan and with the Syrian refugee crisis. It is, unfortunately, a protracted crisis, and so investments in cash assistance make sense financially. However, if a crisis is shorter—if cash assistance were only required for 6-12 months, or less than the nexus between direct and cash assistance costs—it may be more appropriate to provide direct material assistance.

None of this is meant to belie the added value of direct cash assistance to refugees. It is more convenient for refugees, it provides dignity and freedom of choice, it provides broader buying power and functionality for needs that evolve over time, and it provides a direct impact on the local economy.

Cash assistance is a compelling modality because of the freedom of choice and dignity it provides refugees. It is also complicated. It requires savvy negotiations with commercial enterprises, robust financial management databases, highly skilled staff, and other facets that depend on management and financial expertise.

To date there has been sufficient expertise in establishing the system and making its fundamentals work. Much greater attention should be paid to the cost, possible cost efficiencies and return on investment scenarios compared to direct material assistance, and strategies and plans for how to make links to social security systems and other mechanisms at the host community level. This is also an opportunity to strengthen the monitoring and evaluation associated with cash assistance. This should include a cost/benefit analysis compared to direct assistance and other humanitarian contexts as well as the time period of return on investment in different scenarios.

6.5.7 Core Relief Items (NFIs)
The NFI sector only has one objective: to ensure that the basic household needs of women, girls, boys and men are met. The NFI sector has collectively continued to provide for the basic household needs of Syrian refugee women, girls, boys and men living in Jordan. Refugees arriving in Jordan lack basic household items

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127 Although this tends to include rising prices that can diminish social cohesion.
needed to resume their daily activities. UNHCR and its partners provide non-food items (NFIs) for refugees in camps and on-camp contexts.\(^{128}\)

While NFI assistance in the camps is nearly universal, the distribution of NFIs outside the camps is targeted. As there is no standardization of vulnerability criteria, and as NGOs use their own criteria, many vulnerable refugees outside of camps may receive irregular or inadequate support in this area. This is confirmed by the household survey. (Graph 17.)

For people already in Za’atari camp, there is now a distribution centre for NFIs with dedicated mechanisms to identify and prioritize access for the most vulnerable in the camp. Various agencies have also set up formal and informal post-distribution monitoring systems that highlight the extent to which the distributed items are used and respond to the needs as identified by beneficiaries.

NFIs have been supplementing income from cash from work, thereby reducing the shortfall between income and expenses for refugees who have just arrived in Jordan, and for households where one or more family members are working. They are essential to maintain basic standards of living.

Key issues cited by refugees include poor or no access to heating, lack of insulation, and poor access to infant food and hygienic products. The analysis makes it clear that these NFIs were not available in sufficient quantity or quality for the household size. Respondents are concerned about their ability to manage during the winter. (See “Winterisation” below.)

In camps, 91% of households report not having a room heater, with variations observed between districts. 80% of camp residents cook their meals in the communal kitchens. Some of the residents with access to a stove still use communal kitchens, which may point towards gas scarcity.

NFIs needs remain high, but those unmet materially are often met by the provision of cash to allow refugees to decide what they need. The NFI sector has focused primarily on the camp, but has coordinated with the Cash Sector to strengthen coverage in urban areas. It has been a challenge to ensure that targeting has been sensitive to the specific needs of women, girls, boys and men. The NFI Sector will be establishing mechanisms to better target and monitor the impact of NFI support in 2014.

**Winterisation**\(^{129}\)

The winterisation programme, largely carried out by Relief International and other partners, was based on need assessments/selection of winterisation items, distribution/management, and ex post facto assessments including satisfaction surveys. This ensured that items were distributed to those in need and in a relatively timely matter.

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\(^{128}\) UNHCR’s Inter-agency Information Sharing Portal provides ample descriptions of which partners work in which areas, their funding, their activities, and other assessments and reports they conduct. See: http://data.unhcr.org/syrianrefugees/region.php?id=79&country=107

\(^{129}\) This responds to evaluation question 1.2.3.
Based on those surveyed in the household survey, most in the camps found the winterisation package helpful, while a majority outside the camps stated they did not receive the package. (Graph 18)

As part of the winterisation programme, the NFI sector has distributed critical items, including thermal blankets and winter clothing, as well as gas stoves, cylinders, refills and additional housing insulation to assist refugees.

As part of winterisation efforts, 400 families in underserved areas and areas with harsh winter conditions have received shelter upgrades from UNHCR through its partners, NRC and Mercy Corps. Additionally, ACTED has distributed shelter insulation kits to 160 families in substandard accommodation in Mafrak, Irbid, Jerash and Ajloun. Some INGOs, notably ACTED and Premier Urgence provided winterisation packages from other funding sources to partly stop the gap.

UNHCR provided a cash supplement for the most vulnerable to cover additional needs such as fuel, blankets and clothing during the winter months. However, due to unclear vulnerability criteria, NGOs had provided additional winterisation packages to vulnerable refugees who were not included in the winterisation programme.

There were noted issues associated with reaching refugees outside camps. One-third of out-of-camp refugees report having no access to any kind of heating. The majority of refugees with no access to heating live in houses, followed by basements—most shelters without heating are not insulated.
6.5.8 **Health: Providing Health Care Assistance: A Complex Endeavour**

Reported results indicate a significant achievement towards 2013 objectives and reasonable progress towards those for 2014. Noted achievements include:

- **3.3 million** children vaccinated against measles/rubella and 1.1 million against polio;
- **350,744** primary healthcare consultations, including for reproductive/maternal health;
- **4,605** beneficiaries of life-saving and essential tertiary healthcare;
- **51,875** mothers/caregivers received infant and young child feeding services.
- **274** service providers trained on mental health, psycho-social support quality of care, MISP, clinical management of sexual violence and RH standards of care.

Respondents to the HH survey have referred to quality of care as a significant issue. This Evaluation suggests, however, based on the evidence obtained during the field visit and on interviews and data analysed from secondary sources, that healthcare has been provided reasonably well to refugees. No data or evidence suggests overall abnormal mortality or morbidity rates or other indicators that would signal failures in healthcare provision. Quality of care is, however, a significant issue as reflected in the HH survey, and already identified by UNHCR’s health section.

Practically all respondents praise the UNHCR health sector role as cooperative and inclusive. It would be difficult to state that things could have been done better in the sector in Jordan, as an adequate coverage of health needs of refugees has been assured. The decision in March 2012 by the GoJ to grant access to health services to Syrian refugees greatly facilitated the response and relieved the pressure of finding ways to grant services to refugees in non-camp settings. A health strategy advisory group has been created by UNHCR including main stakeholders and MoH to advance an integrated health strategy.

Regarding tuberculosis (TB), awareness activities reached 300,000 persons in 2014, the total of cases detected has reached 127 for the period. Jordan reported 331 new autochthonous cases in 2012. The value of UNHCR/IOM support to TB control should be praised, as imported cases would present a threat for host communities.

Vaccination figures correspond to MoH and UNICEF national campaigns. Primary healthcare consultation refers to the Za’atari camp, as the Jordanian Information systems do not disaggregate consultations and admissions by nationality.

Respondents to the household survey noted various challenges with healthcare services:

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130 This responds to evaluation questions 1.2.8 and 1.2.9.
131 This responds to evaluation question 12.1.
132 Transtec HH survey results, main concern in the camp, third concern in urban settings. Confirmed by interviews to UNHCR and partner’s staff.
133 IOM reported data.
134 See: Jordan Tuberculosis profile at: https://extranet.who.int/sree/Reports?op=Replet&name=/WHO_HQ_Reports/G2/PROD/EXT/TBCountryProfile&ISO2=JO&outt
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Graph 20
Health care, based on its technical nature and the various ways in which it is provided in camp and non-camp settings creates a complexity that leads to several issues and concerns, which can only be effectively addressed by MoH with significant support from a range of development and humanitarian actors.

Non-Camps
In non-camp settings, respondents mention the lack of drugs, long waiting times, and poor quality of services received.\(^{135}\) MoH claims that the pressure of Syrian refugees in its institutions is affecting availability of drugs and supplies and quality of care.\(^{136}\)

The HH survey shows that the main concern for refugees in non-camp settings is the cost of health services. Syrian refugees in Jordan who are registered and have a valid security card have free access to primary, secondary and tertiary care in Ministry of Health facilities. Expenditure may be related to drug shortages in Ministry of Health, use of private facilities or private pharmacy use, treatment for cases not covered by the referral schemes such as elective procedures (e.g. hernia repair).

UNHCR applies a ceiling (above 750 JD) for review by the Exceptional Care Committee (ECC). This approval can be provided by telephone in emergencies. The ceiling for coverage of costs is 6000 JDs for non-cancer cases and 10,000 JDs for cancer. Exceptions can be made at the discretion of the ECC. Some data suggest that around 30% of deliveries in urban settings are carried out in private clinics.\(^{137}\)

MoH claims strains on healthcare facilities. They conducted a recent survey of 301 health facilities in the governorates of Northern Jordan (practically all public facilities in the North). This report confirms that across all 5 governorates, 8.6% of patients who utilised the facilities were Syrians.\(^{138}\)

Issues of lack of access for refugees in remote areas have been frequently mentioned in interviews and evidenced in surveys.\(^{139}\) Mobile clinics address this in part, but require better assessments and more comprehensive planning to be more effective.

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\(^{135}\) This is confirmed by surveys: “Health needs assessment, March 2014, PU-AMI: Population-Based Health Access Assessment for Syrian Refugees in Non-Camp Settings Throughout Jordan.” UNHCR, UNFPA, IMC, May 2014.

\(^{136}\) There are no reasons that would justify this shortage, decreased quality is down to weak management inside MoH. This is an area where improvement is possible at a moderate cost (reinforcing management capacity of the MoH)

\(^{137}\) “Health Access and Utilization Survey.” UNHCR, March 2014

Targeting always includes vulnerable Jordanians, but it is not clear if this includes access to health services or waiving fees for Jordanians. There are some subsidized care possibilities for poor Jordanians, but these are usually subject to nominal fees for private healthcare—a fee normally waived for Syrian refugees. Specialised healthcare is expensive for both, yet Jordanians have fewer opportunities for third-party support.

**Camps**

For refugees in camps, the survey ranks health as the second concern of refugees, after shelter, and the challenges related to health are essentially linked to the quality of care received and the waiting time involved. The distance to the services is also raised (second concern) showing a possible planning gap in the camps, or a transportation problem.

Most agree that there were initial significant difficulties in arranging coherent health service provision in Za’atari camp, something that has been gradually addressed. The number of partners with different approaches, duplications, and the over-concentration of services in some areas have been addressed and an acceptable coordination mechanism is in place. Other issues include:

- Establishing joint standards among service providers;
- Adoption of clear referral procedures between providers in the camp;
- Adoption of a joint HIS (established successfully);
- Establishing quality assurance mechanisms and clarification of accountabilities in case of malpractice; and
- Improving feedback from clients coupled with client satisfaction initiatives.

Referral of patients between providers inside and outside the camps is a common complaint. The system relies on one UNHCR partner (JHAS) that takes care of the procedures and authorizations, and transport means, to refer to MoH outside the camp. Some service providers do not follow standard operating procedures, and this leads to duplications and overall inefficiency. MoH does not always recognize UNHCR’s procedures and the process becomes cumbersome for refugees. The whole chain should be analysed and improved.

The quality provided by some partners in Za’atari raises concern. Some respondents complain about long waiting times. In terms of data, this is difficult to substantiate, but some anecdotal evidence needs to be investigated (apparently avoidable death cases). This concern over quality is shared by UNHCR’s health section. This is an issue that can create tensions. For the time being a scorecard is being introduced with funded UNHCR partners to assess quality aspects of providers, but this has to be anchored in the authority and regulatory capacity of MoH.

The provision of health services in the camps will have to evolve towards a more integrated articulation with the Jordanian health system. This has not been articulated in any strategic approach or contingency scenario for the short or medium terms. Given that more than 80% of refugees are outside of camps and most access MoH facilities the strategic priority may be on enhancing resilience of the MoH in governorates with large numbers of Syrians.

**Access**

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Actors in the health sector have been proactive in providing access to non-registered refugees or refugees whose registration period had expired. Access to health services for refugees with expired registration is ensured through a specific service provision arrangement. This implies that an administrative dysfunction (delayed renewal of registration) would entail additional costs for UNHCR. This should be analysed and avoided. A fast-track registration procedure for health cases has been established, but there was not enough information available at the time of this Evaluation to judge its efficacy and cost implications.

Information

Many informants raise the issue of misinformation regarding the accessibility and availability of health services. Some recent surveys show a deficit of information on refugee access and rights. A previous survey illustrates that among urban refugees, 96.3% knew that all UNHCR registered refugees have free access to governmental services at primary health centres and hospitals. Only 65.8% were aware that refugees who cannot access governmental health services can seek help at UNHCR-supported health facilities.

In addition, there is a lack of information on patient satisfaction. Patients are not properly consulted, informed, and remain somewhat unaware of the benefits and risks of different treatments. The process is still far from “patient-centric.” This is within the purview of the MoH and UNHCR may advocate and/or support any initiative within the MoH that may promote a more patient-centric approaches.

Health Service Support

UNHCR has provided support in equipment and refurbishment of some of the more stretched health institutions in some governorates, as foreseen in the RRP.s. While local health authorities have praised this, the scope is limited in terms of support and the number of facilities, and constitutes no significant change to the access conditions of Syrians.

Involvement of development agencies is very limited in the sector. Respondents highlighted the poor reputation of MoH among donors, affecting their institutional support. It seems that budgetary support would be difficult to channel, and that the Resilience Plan has some weaknesses that could further deter donor involvement. This illustrates some of the challenges associated with a transition from UNHCR to the GoJ and the National Resilience Plan. Yet, this does not mean that nothing can be done. UNHCR should always seek to use its position and mandate to advocate for refugees’ access to services. The development and funding of these services, however, may be better placed with others.

Recommendation 8: WHO and other relevant actors should involve MoH in addressing access to health services and referrals for Syrian refugees as well as establish quality standards. This would be the best solution for the referral problems encountered. To achieve this, the MoH could be reinforced in its capacities and functions in the camps. Additional support should be provided by health facilities outside a camp that is coping with a high influx of refugees, although this should remain beyond UNHCR’s primary remit.

140 By end November UNHCR removed the backlog in the renewal of asylum seeker certificates and all refugees hold a certificate with a one year validity.
142 Health Access and utilization survey (HAUS) among non-camp refugees, Jordan, March 2014
RRP6 includes community health as an objective. This is a critical aspect of a strategic approach for healthcare for refugees. The community-based health program in Za’atari appears to be a very positive step. It could be critical to provide care for the more vulnerable, the difficult to reach, war-wounded and mental health sufferers, among other challenges. It can contribute to improved beneficiary participation and facilitate client satisfaction mechanisms.

**Treatment for War-Wounded**

One of the gaps in healthcare services is the management of war-wounded patients, opaque for UNHCR, with affected individuals de facto off protection limits, even for ICRC. While some of these may not fall under UNHCR’s mandate, given how they were wounded, how their status is defined, and how one interprets article 1F of the Convention, this is a protection issue that seems to be overlooked. Only when discharged from hospital (usually early dischargers requiring medical attention) are persons of concern sent for registration. Underground service providers with no monitoring or supervision provide rehabilitation treatment. This is substantiated by information from key informants at UN, NGOs and UNHCR. Data is incomplete, but it is estimated that over 60 patients a month receive rehabilitation treatment in substandard conditions in home care by Syrian community/partisan organizations.\(^{144}\) This accounts for referrals to RBSA registration centres only. MSF reports an average of 50 cases per month in Ramtha hospital. An HI survey from late 2013 shows that 8% of refugees in Jordan have a significant injury, 80.3% of those as a consequence of the war.\(^{145}\)

**UNHCR should increase attention/advocacy and associated protection strategies for refugees suffering from war injuries who seek treatment upon arrival. This should include clear procedures for treating these persons.** The system for these persons is opaque, with little international or third-party oversight. The precise caseload is largely unknown. There is little assurance that the rights and on-going wellbeing of these victims is assured. There are issues associated with appropriate treatment and on-going healthcare, including psycho-social support. The primary actions will therefore need to be taken by MoH and others. UNCHR’s role should be one of information gathering, analysis, and advocacy, in cooperation with multiple stakeholders for the development and delivery of arguments, rationales, and solutions.

Since May 2014, UNHCR has been conducting weekly visits to all hospitals receiving war-wounded individuals in urban areas to assess their needs and provide additional services accordingly and with the consent of the person. Such services may include: identification of foster families or other forms of temporary care for unaccompanied children; referral to other specialised services (psycho-social support, legal assistance, etc.); and referral to partners’ health facilities, including inpatient services, outpatient services or follow-up rehabilitative services.

### 6.5.9 Education\(^{146}\)

While education objectives have been largely met, the continued strain on the Jordanian educational system raises concerns that educational standards may decrease and that this, amongst other factors, could lead to increased tension amongst refugees and host communities. Respondents in the household survey cited few challenges with schooling for their children. (Graph 21.)

Schools have been overwhelmed by the influx of Syrian refugees especially in Amman, Irbid, Mafraq and Zarq where over 90% of children attend school. Syrian parents in host communities face economic and geographic challenges (school costs and distance) that may prevent them from sending their children to

\(^{144}\) IOM figures.

\(^{145}\) “Hidden Victims of the Syrian Crisis.” Help Age and HI, published March 2014

\(^{146}\) This responds to evaluation questions 10.1.4 and 10.1.5.
school. Child labour and early marriage hinders children’s access to education. Refugee children who have access to public schools often fall behind for reasons including differences in the curriculum, and the loss of school time.

Education needs include:

- Provide remedial language support;
- Increase accelerated programmes for out-of-school children;
- Increase the number of remedial classes in an out-of-school system;
- Harmonise the efforts of UNHCR, NGOs and MoE.

Dropouts are a significant challenge, and an overall assessment is called for to tackle this problem.

Persons with special needs, especially children with physical disabilities, are often the most affected group as their access to services is limited by displacement. Assistance to this population is further constrained by a lack of data.

Access to tertiary education also presents challenges. Some students have voluntarily registered in the biggest refugee camp, Za’atari, but many remain unregistered in host communities. On the basis of extrapolation, the total number might be around 1,500 students (Za’atari hosts some 20% of the overall Syrian refugee population in Jordan). The need is more urgent since there are Syrian pupils who already completed their secondary education in Syria but did not yet enrol in tertiary education. It may be expected that some 300 Syrian refugee pupils are now in the last phase of their secondary education (in Za’atari alone some 60 students prepared for their school-leaving examinations. As Zataari houses 20% of the refugee population, the total number of students may be extrapolated to approximately 300). This figure is likely to rise in the coming years.

Access to tertiary education system in Jordan is currently very difficult for Syrian refugees since there is a general competition on the basis of merit and many universities have quotas and requirements that cannot be met by Syrian refugees. In addition, many universities in the private sector request fees that are unsustainable for Syrian refugees. At the same time, any permanent in-country solution proposed for Syrian refugees would have to be accessible for students from Jordanian host communities as well.

According to the Ministry of Higher Education, in January 2014 some 900 Syrian students were registered at universities in Jordan. However, it is not clear what the baseline was in 2010, so that it cannot be easily deduced whether there was a pre-existing trend for Syrians to study at Jordanian universities and whether or not this increased during the crisis. Any form of higher education would therefore require an assessment of earlier learning routes (ECTS accreditation of prior learning) before suggesting the most suitable pathway in either English or Arabic through distance learning or blended study at unaccredited institutions in Europe or the Middle East. The situation in Lebanon is similar, but as many higher learning institutions are private, access is even more difficult.

Qualitative data suggests certain frictions between UNICEF and UNHCR in Jordan as there seems to be an assumption on both ends that one organization is not cooperating with the other or that one organization has an interest in ‘taking over’ responsibilities which are primarily in the hands of the other.\(^{147}\)

There is a global memorandum of understanding between UNICEF and UNHCR that establishes the parameters of their roles and responsibilities. Most conflicts are personal rather than structural. This seems to manifest itself in a difficulty to schedule meetings, with noted delays, and a significant problem in

\(^{147}\) This is represented by an analysis of relevant qualitative data. However, this is not presented here, as anonymity could not be preserved.
actually following-up on these meetings by sharing data and information. These issues are not alarming and there does not seem to be a significant impact on how education services are being delivered.

In the area of basic education (and since UNICEF is the primary agency for addressing the educational needs of children), a strong partnership between organizations is key, particularly in the area of policy and development. A current and positive example is in Accelerated Education, where UNICEF has been working with the Ministry of Education to establish a programme for young people aged 9-17. Upon hearing that UNHCR is also interested in supporting accelerated education, UNICEF immediately reached out and requested that UNHCR join meetings with MoE to discuss the programme.

UNHCR’s work in higher education is important, because it is not an area where UNICEF generally works. UNHCR’s role here should continue, and it would be particularly beneficial if sufficient funds were made available to support the higher education needs of the refugee population. Exploring ways to support distance learning might be essential for young people in the camps who have little access to formal education. This may be done through partnerships with local and international universities (including those who offer courses—accredited or not—online) that might provide opportunities, through higher education learning spaces for those who might be enrolled in a distance learning program, establishing a ‘campus’ of sorts where visiting professors could lecture and offer supervision, guest lecturers, and face-to-face interaction with students.

6.6 Effectiveness

UNHCR should be lauded for its effectiveness in most areas. It has addressed, and continues to meet, most needs effectively. In the context of a highly complex crisis whose scale and pace are largely unprecedented, this is truly remarkable.

There are noticeable issues in the protection area, and the complexities of health and education cannot be overstated, as noted above. UNHCR can and should also improve its strategic planning, financial management, and overall efficiency and cost effectiveness. (See section 6.9.) This is not separate from direct humanitarian assistance, but actually inherently linked to it, and the best way to ensure that limited resources are leveraged appropriately and gaps and overlaps are minimised.

6.6.1 Has UNHCR been effective in reaching pre-determined objectives? (1.1)

UNHCR has largely achieved its objectives as stated in Regional Response Plans 5 & 6 and as correlated with the UNHCR results framework for 2012-2013. This includes broader strategic objectives and those

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148 UNHCR has stated objectives for the response as a whole, objectives that correspond to UNHCR and partner responsibilities and internal operational objectives that are linked to its global results framework. While the result framework guides issues related to
related to specific sectors. This is largely confirmed by qualitative and quantitative evidence as well as the analysis presented below:

Qualitative and quantitative evidence illustrates overall satisfaction with UNHCR’s effectiveness.

Graph 22 shows the trend of “positive” and “negative” comments across different cohorts interviewed during the field phase. Most respondents are fairly positive about how UNHCR has met stated objectives. International NGOs and national NGOs seem to have a different impression: they tended to express less satisfaction regarding the procedures and rules UNHCR uses to coordinate activities and sectors. While these certainly complicate some aspects of how UNHCR delivers objectives, additional analysis shows that these did not prevent UNHCR from achieving objectives.

The achievements and constraints associated with these objectives are amply described in the subsequent regional response plans. Considering the progress towards the RRP6 objectives, between January and June, we have no reason to dispute the information provided on UNHCR’s Inter-agency Information Sharing Portal. There are some issues that deserve special attention or that are not directly covered.

When the same qualitative evidence is organised by sector, different issues emerge (Graph 13). This shows significant satisfaction with cash and food security, general satisfaction with education, and less satisfaction with the remaining sectors. As described below, health is particularly complex and there are issues that are difficult to address. Non-food items (NFI) and WASH relate to issues in Za’atari and growing concerns in non-camp settings. Community/livelihood is, as the analysis below describes, an area that needs more targeted attention, and where a detailed strategy with the Government of Jordan (GoJ) may have facilitated better results.

**Strategic Objectives**

RRP5 strategic objectives concern the accommodation of 300,000 refugees in camps (Objective 1), support to refugees in urban and rural settings (Objective 2), and support to host communities to mitigate negative socio-economic impacts (Objective 3). Whereas the first of these was amply achieved, there have been constraints and issues associated with the latter two.

While UNHCR and partners are engaged in various activities to meet the protection and assistance needs of refugees in non-camp settings, achieving success is challenging given the lack of information, access, location, and mobility of refugees outside camps.\(^{150}\)

operational management and efficiency, the RRP objectives are better suited to all other analysis. See, UNHCR, “Syria Crisis Humanitarian response: Common Planning Framework 2014.” UNHCR, 2013.

\(^{149}\) See “Data & Analysis Report: Jordan” included as a separate Annex for the qualitative statements that correspond to this graph.

\(^{150}\) This is implied by the “Joint Assessment Review of the Syrian Refugee Response in Jordan” that includes various protection issues, albeit with few indications of how many cases for each category (SGBV, child protection, mental health and psycho-social support), let alone issues regarding access to territory and refoulement. See: UNHCR, UNICEF, & WFP, January 2014.
With regard to supporting host communities, there is a growing burden on them that constrains UNHCR’s capacity to meet this objective. Local authorities are experiencing significant resource and other constraints that make the continued servicing of Syrian refugees and others difficult. Informal labour markets are oversupplied, limiting opportunities for short- and medium-term livelihood strategies. Consumer markets are experiencing price increases due to rising demand, although it seems that commodity prices have remained relatively stable. Food distribution is emerging as an inequity between refugees and host communities. All of these, and other issues, make support to host communities exceptionally challenging for UNHCR, and should perhaps be served by the GoJ and other development actors.

6.7 Coverage

All evidence suggests adequate coverage for registered refugees. This is supported by the improved registration system, the progress in need assessments and targeting, and the use of the online Inter-agency Information portal used to facilitate partner work.

However, gaps exist, primarily in non-camp settings where refugee communities are often hard to reach, dispersed, transient, and largely reliant on Jordan’s services. This is most noticeable in the health sector (see section 6.5.8.) and in education. (See section 6.5.9.)

Evidence furthermore suggests that UNHCR’s capacity to meet these needs is at its apex and that, without comprehensive and informed strategies by the GoJ and relevant Ministries, these gaps will increase and may fuel tensions with host communities.

6.7.1 How does UNHCR ensure that the maximum number of refugees in need receive protection and assistance? (2.1)

Most respondents and supporting qualitative evidence indicate that UNHCR is effective in ensuring that the maximum number of refugees receive protection and assistance:

<table>
<thead>
<tr>
<th>Qualitative Data: How does UNHCR ensure that the maximum number of refugees in need receive protection and assistance? (EQ 2.1)</th>
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<td>26</td>
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<td>51</td>
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<td>76</td>
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<tr>
<td>101</td>
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<tr>
<td>46% Positive</td>
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</tbody>
</table>

Graph 23

The primary mechanism to ensure that the maximum number of refugees in need receives protection and assistance is the registration process. This process has been significantly improved, and UNHCR currently manages to maintain no backlog. WFP manages to reach 98% of registered refugees and, where food distribution was based on vouchers, UNHCR had the opportunity to engage directly with the entire registered population if needed, including new protection needs, status verification, and other opportunities for information sharing/support.

Coverage is further supported by call centres that were designed by Cisco and that have a capacity to field 1,000 calls a day with a dispatch board for specific cases (legal, protection, shelter, cash, etc.). At the same time...
time, there is some duplication between UNHCR and WFP call centres. A recent agreement between UNHCR and WFP should correct this situation and signals additional improvements in efficiency, management, and outreach.

UNHCR and partners also use a number of other outreach activities to improve access to services.\textsuperscript{152}

While the registration process coupled with the call centre greatly enhances UNHCR’s capacity to ensure that the maximum number of refugees receive protection and assistance, this is challenged in non-camp settings. (See Section 6.1.) These indicate challenges in coverage, even though UNHCR has done a great deal to meet these to date.

6.7.2 \textbf{What makes registering with UNHCR important? (2.2)}

There is evidence that being registered benefits refugees and that they largely recognize the importance and benefits associated with registration. 98\% of refugees surveyed in non-camp settings state that registration is important, and 100\% of those in the camps state the same.

This indicates that UNHCR’s investment in advanced registration systems to streamline the registration process probably has had the most important impact for refugees. Refugees receive approximately US$30 dollars worth of food every month, and registration grants them access to health services and education, which is critical for many.

UNHCR’s data collection from registration and other activities serves as a basis for broader economic and statistical analysis. While this could be strengthened, especially with the creation of a dedicated corporate economic/statistics unit, it provides a basis for humanitarian assistance, resilience, and longer-term development analysis.

6.8 \textbf{ Appropriateness}

Most evidence suggests that UNHCR and its partners have been diligent in identifying and targeting needs, while ensuring that any assessment or target takes cultural and contextual issues into account. If anything, the plethora of assessments by different organizations and towards the identification of different needs has perhaps blurred a more strategic and focused assessment of how to leverage limited resources for those most in need.

To date, it is critical that this level of assessment and targeting has taken place. There is a strong informational foundation for more refined and focused studies going forward. There is a greater understanding amongst partners, which provides more opportunities for joint activities, cross-cutting themes, and the elimination of duplications.

While this foundation is in place, it has yet to be tested. This will be integral to how the response proceeds. It requires a much more focused, strategic, and efficient approach at all levels. This is what will prove to be most appropriate for the refugees and for how UNHCR meets their protection and assistance needs.

\textsuperscript{152} This section corresponds to evaluation question 2.1.1.
6.8.1 **Do assessments and targeting ensure that needs and priorities are identified?**\(^{153}\) (3.1)

UNHCR and its partners have developed a broad infrastructure of assessments and targeting to identify refugee needs. These exist at the sector levels and at the inter-agency level. They cover everything from assessments of mental health and psycho-social needs to regular population profiling assessments. In a review of the literature, every sector included an assessment, with most conducting multiple and periodic assessments on different issues and activities.\(^{154}\) There are also a growing number of assessments that treat hard-to-reach and possibly underserved refugees.\(^{155}\)

The quality of these assessments is mixed. There are wide ranging methodologies used for data collection and subsequent analysis. Findings and conclusions can be as succinct as a presentation, or as lengthy as a book. Some provide detailed information, which is updated regularly, as in the case of WASH activities in Za’atari camp, while others can be “one-off” exercises.

There are some multi-sectorial assessments, but these are few and, again, tend to serve varying purposes. For instance, the “Multisectoral Assessment Report” conducted by Première Urgence and Aide Médicale Internationale\(^{156}\) is detailed and relatively robust, yet it stands alongside Jordan’s own Needs Assessment Review that became the basis for the National Resilience Plan. Both of these have their strengths, yet they apply different approaches to the same subject—with different findings and outcomes, this can lead to confusion and a waste of resources.

This is confirmed by qualitative evidence:

<table>
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<tr>
<th>Qualitative Data: Do assessments and targeting ensure that needs and priorities are identified?</th>
<th>(EQ 3.1)</th>
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**Graph 25**

As elsewhere, most positive comments state that there has been a significant improvement in how targeting is done, avoiding overlaps and gaps. Some negative comments relate to UNHCR branding and the opportunity to do assessments as single organisation as a way to increase visibility. A similar trend is evident in the post-field phase survey. (Graph 25.)

Another issue raised by respondents is the belief that many of these assessments,

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\(^{153}\) This includes responses to this question’s sub-questions, mainly 3.1.1 – 3.1.3.

\(^{154}\) This was done by a review of all assessments available on the Inter-agency Information Portal. This does not constitute all assessments that have been performed.

\(^{155}\) By way of example, see “Jordan Valley assessment of Syrian Refugees,” Emphnet, presented on 20 March 2014 in Amman.

especially those done beyond the RRP process, are designed for resource mobilisation. While difficult to substantiate how widespread this may be, it is symptomatic of organisations that are not fully funded from the RRP and that still identify needs that match their competencies and operations.

This range of assessments—some serving resource mobilization, some refugee needs, many both—is not wholly reflected in the needs identified in the RRP process. Nor is the Coordinated Needs Assessment trainings facilitated by SNAP/ACAPS. This process is facilitative and participatory, bringing different organisations together to discuss needs and to see how these square with overall objectives. It is a compilation exercise, not a rationalisation or review of existing need assessments. Overall, this ensures that needs are met, although more efficient strategies would be welcome. This is confirmed in the post-field survey, where 30% of respondents state that UNHCR priorities need improvement, while 9.76% find the priorities unsatisfactory.157

6.8.2 Are activities associated with assessments and targeting sensitive to the local context and customs? (3.2)

All evidence suggests that assessments and targeting are sensitive to the local context and customs. This is confirmed by a review of these assessments and by qualitative data:

| Qualitative Data: Are activities associated with assessments and targeting sensitive to the local context and customs? (EQ 3.2) |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 |
| 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 |

**44% Positive  32% Negative**

Graph 26

Most respondents state that UNHCR and others are “good” in this regard. Some negative comments relate to how different organisations work with line ministries and other government officials. There were negligible comments about cultural norms.

While there are issues regarding WASH facilities in the camps, access to women and children in non-camp settings who may be subject to SGBV and other protections issues, and other issues, by and large most activities are sensitive to the local context and customs.

6.8.3 How well has UNHCR adapted to changes in the situation and made effective use of contingency planning? (3.3)

Given that UNHCR applies a large proportion of its planning to RRP, a document covering 12 months that essentially serves as a financial appeal means that there is much less emphasis on strategic planning, contingency planning, risk analysis, and other tools that can support UNHCR in how it provides protection and assistance. While contingency planning is related to other efforts, notably by OCHA, there is a need for it at the country level and as part of a more effective country-level strategy.158 While the RRP for Jordan notes the use of contingency plans for the influx of refugees at each sector level, these were finalised and implemented at the sector level.

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157 Post Field Phase Survey, question 11. Please see separate Annex for the full results of this survey aggregated by Jordan, Lebanon and different cohorts.

158 “Inter-Agency Contingency Planning Guidelines for Humanitarian Assistance (Revised).” Inter-Agency Standing Committee (IASC), November 2007.
6.9 Efficiency

Efficiency, while recognised as important, is not integrated into operational management, and so remains ad-hoc and limited. More importantly, when it is addressed, this is usually from a budget perspective—is the money really needed and will it be spent appropriately? While UNHCR demonstrates effectiveness from this budget management point of view, this is significantly different from efficiency.

This lack of an integrated, operational focus on efficiency is due to the lack of sufficient attention, management skills, and available information, but also to the nature of UNHCR/UN accounting standards and approaches that separate overheads and other indirect costs from operational budgets. While general practice would dictate that the latter should be addressed first, this seems unlikely given the labyrinth of decisions that would need to be taken, the business process improvements that would need to be implemented, and then general system-wide uproar this might cause.\(^{159}\) The first would have a significant impact but it requires managers to consult and use financial management in their day-to-day operations—not as budgets or accounting/procurement requirements and procedures, but as a vital source of intelligence about the operation’s performance.

Most relevant financial information is available. UNHCR implemented International Public Sector Accounting Standards (IPSAS) in 2012. IPSAS provides for income statements and cash flow statements that can be vital for the effective management of any operation. There are also cash effectiveness criteria that establish benchmarks for key items. However, IPSAS reporting has not been sufficiently rolled out to the operational level in Jordan to meet necessary management requirements.

Given that this form of financial management is not fully integrated into management decision-making, efficiency tends to be emergent or ad hoc. For instance, although it is clear that certain processes and procedures get better and faster through repetition, only analysis will allow to verify and quantify this. It is also clear that innovations can lead to dramatic cost savings. For instance, though the use of IRIS technology and other automation for the registration process saves a significant amount of money, no one was able to provide an analysis of these savings for this Evaluation.\(^{160}\)

While there have been significant cost efficiencies—and one can assume that there have been efficiency gains in certain processes—the primary cost centre, mainly human resources, is not reviewed from an efficiency perspective. The use of UNOPS individual contractor agreements encourages workforce flexibility, yet nobody seems to know how much money is saved, again because of insufficient internal analysis. In discussions with the Division of Human Resources, the challenges and constraints in determining and filling posts in the Syria response were highlighted as enormous, but there was no clear sense of the impact on efficiencies or on potential/real system failings. Instead, it was presented as a matter of resources, i.e. cost rather than improved management.

We recognise that this is not unique to UNHCR and that there are many other factors that constrain UNHCR’s and other UN organisation’s financial management capacities. However, this is becoming more of an issue as impact and efficiency become key performance indicators. This is not simply because of donor requirements but because of a recognition that with better financial management comes more efficiency, and hence more available funds to serve refugees. Every penny is precious, because it can mean that additional lives are saved and served.

\(^{159}\) This is an under-reported and yet significant issue for public-sector international organisations. As these organisations become more performance oriented, as resources become more limited and competition for them increases, and as a new generation of staff, steeped in a new recognition of the value of business approaches, takes the reins, financial information will become more vital. However, significant strides in this are not expected for years to come.

\(^{160}\) We attempted to provide some initial ROI calculations, but the financial information was so diffuse and incomplete that this proved impossible given the remit of the Evaluation.
6.9.1 Does UNHCR have mechanisms in place to determine and measure operational efficiency (direct costs) in the Syria response in Lebanon and Jordan? (5.1)

UNHCR is IPSAS-compliant and has a wealth of financial information available but it is not easily transferable to standard financial documents for management, e.g. income statements, cash flow analysis, and balance sheets. Nor did this Evaluation discover common and standardized benchmarks, or ratios for efficiency in key business processes, procurement, or other activities.

This is partly due to the way internal corporate structures, systems and guidelines collect and organize financial information. UNHCR has invested in the improvement of financial management by improving its risk management approach, becoming IPSAS-compliant, and by strengthening financial closing practices, the latter of which should provide more timely financial information of managers. However, these occurred in the last 2-4 years, and so their full potential has not yet been reached. Although it is possible to get financial information from the current MRSP system, once again the information focuses on expenditures and commitments rather than common financial data used for financial management, strategic decision making, and on-going continuous improvement and efficiency gains.

The current availability of elements of an internal control system, but without an integrated framework for all expenses and budgets, also presents a gap in UNHCR’s capacity to be efficient. Control frameworks are not only meant to ensure appropriate expenditure but can also act as another source of consolidated financial information that can be used to gauge performance.

Given these and other sources of financial management and accounting information, there are mechanisms in place to determine and measure operational costs (as compared to efficiencies). However, specific managerial expertise is required to leverage this information for improving efficiency across operations. If a manager does not use such information, it remains accounting and budgeting information—not a tool for performance optimization. (See section 4.1.0.2 for what this level of analysis could include.)

While a review of global appeal figures from 2010 to 2015 shows significant fluctuations in how budgets are allocated across outputs, these fluctuations indicate varying priorities and needs, rather than signs of inefficiency or unqualified increases in logistics and management support:

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163 The figures are drawn from the appeal figures included in the relevant RRP. The analysis in the tables was performed as part of this Evaluation’s analysis.
This shows that sector outputs saw the strongest variation. “Basic needs and essential services” was the biggest decrease between 2010/2011 and 2012/2013, including revised figures. It also constituted the largest increase for 2014/2015. Logistics and operations management remained relatively steady with a decrease in operations management for 2014/2015. This demonstrates fairly convincing budgetary management.

However, if one reviews actual increases in real terms, different issues arise:

This shows huge increases in “Basic Needs and Essential Services” (645%) and an unprecedented leap in “Logistics and Supply” (1,906%). While the rationales for these increases are seemingly warranted, they present significant management and efficiency concerns. How does one triple, quadruple or increase operations tenfold, when they are not naturally scalable?

Logistics and supply may be fairly scalable, but an increase of this level is sufficiently significant to set off an efficiency alarm. How does UNHCR know that it is getting the best terms from suppliers? How is it managing its fleet given this increase? Are supply chains properly optimised for this scale?

In the case of the sector activities growing at rates of 300-600%—unprecedented thus far in the response—there is a real concern that UNHCR may increase inefficiencies and waste rather than leverage its experience regarding proper cost management. UNHCR’s track record to date does not raise serious concerns.
concerns about effectiveness and overall capacity to deliver, but there has been such a dearth of attention paid to cost effectiveness and efficiency that this hike in service levels may simply compound inefficiencies.

### 6.9.2 What does UNHCR do to ensure/improve efficiency in its operational response? (5.2)

UNHCR's efficiency gains are largely *ad hoc* and/or derived from innovations that serve multiple purposes, like the enhanced registration system. This Evaluation discovered very little in the way of systematic, integrated approaches to financial management and efficiency.

Cost effectiveness, e.g. timely spending of what is allocated, is slightly different. Here, UNHCR's budget controls and budget management seem effective. This holds true for both UNHCR and its partners.

This evidence illustrates that UNHCR is focused appropriately on budget management. However, without an equally integrated focus on efficiency, there is bound to be waste and overlaps.

While a significant shift in how management works with financial information as strategic and managerial tools is necessary—with some short-term recommendations noted elsewhere—this is a long-term issue that should be handled at the corporate level. In Jordan, the following recommendations should be considered to increase efficiency in the short term:

- **Recommendation 9**: Conduct a staffing/performance audit designed to pinpoint possible gaps (probably at the sub-office level) and redundancies (possibly at the Country Office level). While difficult to ascertain in this Evaluation, the staffing of Country Office posts has been somewhat erratic: it is not clear whether the staffing balance is now correct or bloated. There are indications of staffing gaps, at Za'atari and for on-camp activities. Any staffing review should include regular staff, international staff, consultants and other short-term contracts, including UNOPS contracts, and any and all other relevant staff.

- **Recommendation 10**: Conduct a business process efficiency review. The response has included the development of several business processes, standard operating procedures, and other operational activities that may or may not be wholly efficient. Insufficient analysis has been done on these, especially as many were developed in response to escalating needs. This review should be designed to decrease costs (indirect and direct) related to these processes without sacrificing quality.

- **Recommendation 11**: Review/revise terms with all commercial suppliers. Ensure that the terms include key performance targets and expected cost efficiencies over time, e.g. a 5% decrease after 12 months. This is standard practice in most industries and should be part of standard procurement procedures in operations of this size.

- **Recommendation 12**: Review other significant cost centres, e.g. fleet management, and ensure that there are adequate cost-effectiveness measures in place. While this was not directly part of this Evaluation, fleet management, facility maintenance, and other overhead costs can provide significant cost reductions without impacting direct services to refugees.

### 6.9.3 How willing and effective has UNHCR been in introducing refinement and innovation across the sectors to transition to a more cost-effective, sustainable response to a protracted situation? (6.5)

UNHCR has been effective in introducing continuous improvement and innovation in various activities, including, but not limited to, the registration process, the use of online information portals, the “urban-vision” approach to camp management in Za’atari, and the leadership/management of Sector working groups.

Some of these have been out of necessity, like the Sector working groups, while others, like the emerging opportunities and innovations associated with IRIS scan technology, identification bar code processing, and others, have emerged out of other innovations. In fact, there was a general appreciation amongst
managers of new innovations and finding new ways to do work, that have resulted in significant material gains, business process improvements, and greater cost-effectiveness and efficiency. This is a significant success of this operation given its scale, pace and complexity.

The IRIS scan technology for registration, particularly, not only represents an innovation but also presents opportunities for significant innovations going forward. The fact that it is being used for unconditional cash transfers in Jordan is significant. There are also multiple opportunities associated with the data and information collected on refugees.  

At the same time, there has not been a consistent, formalised, and operational focus on continuous improvement and efficiency. Rather, these innovations have been emergent, spotted and capitalised upon by smart and capable staff members. Continuous improvement, as based on real improvements in business process quality and in real efficiency/cost savings, should be a regular part of how relevant staff work. This is not the case. Nor has there been sufficient analysis of the innovations to date to understand their efficiency and cost-saving gains in real terms. They are definitely significant, but no actual analysis has been performed.

6.9.4 *What is the level of timeliness of the response in terms of both planning and delivery? (5.3)*

Ample evidence illustrates that, in most cases, UNHCR and its partners provide a timely response regarding both planning and delivery. This is illustrated by an average 92% implementation rate in 2013 across partners, showing that partners have spent allocated funding as planned.  

Where there have been difficulties, primarily in the Za’atari camp in 2012 and in early 2013 as well as in non-camp settings, UNHCR and others have adjusted and adapted to meet related challenges.

While sectors and activities have been additionally analysed in Section 6.5, it is worth highlighting some facets of their timeliness in terms of planning and delivery:

**Protection:** While UNHCR faces difficult protection challenges at the time of writing, it has been relatively responsive to protection issues as they emerge. All evidence points to a swift response to issues even if a different strategic tack may provide better results. While somewhat related to planning, the increase in protection issues indicates what can happen when an organisation, in any sphere, is spread too thin—it can face challenges in areas that should be sacrosanct.

**Camp Management:** Za’atari faced serious problems in service delivery, unrest, safety, and sanitation for the first 6 months. These have been largely addressed. Yet, there are other issues that would have benefited from better planning. Forward planning could have prevented some of the environmental degradation issues that the camp currently faces as well as some of the persistent health and sanitation issues. However, the camp management is working quickly and effectively to address these and other issues as they emerge. Azraq Camp has incorporated many of the lessons from Za’atari although the sourcing of potable water was a persistent problem at the time of this Evaluation. In addition, given that camp occupancy in Azraq is far below capacity, much of the planning has become redundant. Among the lessons learned from Za’atari was the appropriateness of providing for the families to cook in their shelter rather than in collective facilities. This is in line with the dignity of the refugees and positive for the protection of women and girls.

**Cash Assistance:** As noted, cash assistance has been timely and responsive to refugee needs and stands as a greatly enhanced aid modality based on the experience in Jordan. It could benefit, however, from

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164 With some modifications, the World Bank is using this data for economic analysis in Jordan. This will support Jordan as it implements its National Resilience Plan.

165 “Budget and Implementation Rate per Partner – 2013.” UNHCR internal document.
improved (and standardized) vulnerability assessment so as to better prioritize those who are in dire need. As cash criteria and related vulnerability assessments become more refined, UNHCR and related partners will need to assess other support, for example employment generation, to ensure that the medium or mildly vulnerable are also addressed. Vulnerability is not static and those that are “mildly” vulnerable today can be acutely vulnerable tomorrow.

Community Services: CS effectively coordinates with field programmes to address refugees’ needs. There are few noted issues here, although as noted, community services in urban areas could be expanded and especially with local municipalities and other actors.

Core Relief Items: Evidence suggests that by mid-2013, core relief items were provided in a timely manner in the camps, but it is not clear whether there is adequate coverage in non-camp settings. (Section 6.5.7.) The winterisation programme also experienced noted delays. However, the HH survey indicates that a fair number of households received a winterisation package and found it helpful. (Section 6.5.7.) Some have stated that winterisation needs a dedicated working group so that actors can review performance/improve post-distribution monitoring and timeliness overall.

Education/Health: The timeliness of the response in these sectors largely depends on the Jordanian government. In health, access of refugees in host communities is linked to refugee registration and GoJ health system performance. Respondents mention the lack of drugs, long waiting times, and poor quality of services received. MoH claims that the pressure of Syrian refugees in its institutions is affecting availability of drugs and supplies and quality of care.

Food Security: This has been managed successfully by WFP, mainly, and has been timely throughout.

Shelter/Water & Sanitation: While these services, mainly in the camps, have been provided in a timely manner, this was often in ways that increased tensions amongst refugees, e.g. regarding the placement and distribution of water, and in the negative environmental impact associated with wastage, sanitation, and other aspects of water and sanitation.

6.9.5 Does UNHCR provide sufficient value to justify inherent transaction costs/comparative advantages between donors, itself and partners? (5.4)

UNHCR’s successful coordination and implementation supports its effectiveness and impact. However, actually creating value is a more difficult question. This goes beyond “value for money,” which usually refers to ensuring efficiency and costs savings in procurement. Broader value means the value of UNHCR and its activities to the refugees it serves and to the international aid community that supports them. While a common model for value in humanitarian assistance remains elusive, the OECD defines it as:

- Best use of resources to achieve intended and sustainable outcomes;
- Striking the best balance between economy, efficiency, and effectiveness to achieve the desired impact.166

The latter point moves towards a more comprehensive definition of value. In this regard, UNHCR has provided value in most areas. It could improve efficiency and cost-effectiveness, and yet it may not have been well placed to do so until now. Its focus, quite appropriately, has been on meeting refugees’ protection and assistance needs. If UNHCR treats issues of efficiency diligently and as recommended in this Evaluation, it will increase overall value even more.

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Transaction costs incurred by UNHCR are considerable. Every transaction includes a cost and the funnelling of money through UNHCR to over 64 partners in Jordan pushes most of those transactions onto UNHCR and its partners. Donors could provide direct assistance to all of the different organisations, and some do, yet this would increase donor transaction costs—it would push these costs back up to the funding source.

It is not clear whether any change to how and where transaction costs are incurred is viable. More importantly, UNHCR has proven capable in its role, and so, while there may be more value to be had, any radical change in this area could be disruptive and counter-productive.

**Recommendation 13:** UNHCR could increase not only value but also effectiveness of its leadership role through more detailed performance appraisals of funded partners. This can become a useful tool for all coordination activities and towards more focused results. This could include greater due diligence on existing competencies, gaps, and historical performance with benchmarks and key performance indicators for their work under the RRP. This would need to be treated sensitively. UNHCR is already sometimes faulted for its “double-triple hatting” between funding, coordination and implementation. There are also complaints about rules, e.g. staffing requirements that UNHCR imposes but does not apply itself. However, there are also widespread comments about the varying level of quality amongst UNHCR partners and the impact this has on effectiveness and quality of services. Conducting performance appraisals would ensure better performance and increase UNHCR’s value overall.

### 6.10 Impact

In general, the response in Jordan is at a critical transition point that will determine longer-term impact. This will depend on how the GoJ secures funding for and implements its National Resilience Plan, how UNHCR devolves responsibilities and activities to the GoJ and other actors, and how the crisis evolves. While Jordan has effectively reduced access to territory, the crisis remains volatile and could result in unprecedented flows of Syrian, Iraqi and other refugees around the region.

UNHCR’s effectiveness to date, as described in this Evaluation and elsewhere, bodes well for the refugees. UNHCR has been and should continue to be lauded for its work in a complex, fast-paced and enormous response. This and other Evaluations find only minor, albeit significant, technical issues in different areas and activities that do not seem to be the result of foreseeable problems or unreasonable errors. While the lack of an integrated approach to financial management and efficiency is a gap, one may expect that UNHCR, given its track record of adapting and innovating rapidly, may be able to fill this quickly.

At the same time, UNHCR should capitalize on this transitional point in the crisis and meet the various needs that have emerged from this Evaluation. These key issues will, if addressed, not only support ongoing effectiveness but longer-term impact as well:

- UNHCR needs to amplify and strengthen its approach to the rising protection issues in Jordan, reflecting its core mandate, core competencies, and need to provide this vital support to refugees.
- UNHCR needs to increase its material and consultative support of initiatives aimed at refugees in non-camp settings, addressing the social cohesion issues in the northern governorates, the more transient refugees in the Jordan River Valley, and the protection needs of women and children who are difficult to reach.
- In direct collaboration with the GoJ, which has administrative authority over the camp, UNHCR needs to address, firmly and openly, Za’atari’s “urban vision” and decide what resources may be required to meet GoJ’s agreed-upon longer-term plan for the camp.
- UNHCR needs to devolve coordination, leadership, and resource mobilization for education and health, amongst others, while supporting the GoJ’s National Resilience Plan and other actors best suited to support longer-term development challenges.
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- UNHCR needs to standardize its objectives, and strengthen the operational links between RRP objectives and those in the UNHCR results framework.
- UNHCR needs to rationalize, systematize, and standardize assessments and targeting to facilitate how the most vulnerable refugees’ needs are met, especially in non-camp settings.
- UNHCR needs to integrate country-based strategies and planning with a coherent regional strategy, completed by UNHCR, that takes into account the various scenarios that can impact refugees and IDPs throughout the region, the competencies and commitments of host governments, and the complexities associated with durable solutions in this context.

6.10.1 Do UNHCR’s pre-determined objectives (RPP6) safeguard the rights and wellbeing of refugees? Could they be expanded, reduced and/or changed to better meet the needs of the refugees? (4.1)

The objectives, as noted in Sections 6.5 and 6.6, are comprehensive. They include general objectives and sub-objectives for each sector. Expected outputs and indicators support these further.

There is general agreement as well that these objectives are designed to safeguard the rights and well-being of refugees:

| Qualitative Evidence: Do UNHCR’s pre-determined objectives (RPP6) safeguard the rights and well being of refugees? (EQ 4.1) |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 |
| 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 |
| 32% Positive 11% Negative |

Graph 29

Objectives have changed with each RRP iteration. While some may argue that this reflects the growing complexity of the humanitarian crisis and the needs of the refugees, this dilutes focus and thus long-term impact. These objectives, on the most part, did not change because previous objectives were fulfilled. Instead, there is a consistent level of “wordsmithing” with the inclusion of new objectives and dropping old ones even when previous objectives have not been met.

This is related to broader conclusions about increased strategic planning and thinking and, coupled with this, robust and static objectives that can guide a protracted humanitarian crisis and the transition to resilience and development activities.

6.10.2 How do UNHCR and its partners provide assistance in ways that safeguard refugees’ rights and well being, including their longer-term needs? (4.2)

The livelihood issue is quasi-impossible in Jordan, and hence the “long-term needs” statement has to be approached with caution. Any Syrian caught working risks imprisonment and deportation, and there have already been cases of imprisonment and deportation.

A recent study by CARE provides a set of recommendations, most of which are directed at the GoJ and tend towards the aspirational rather than actionable.167 These include:

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• The international community should support the government of Jordan in creating an enabling environment that allows for small-scale, home-based income-generating activities for both Jordanians and Syrian refugees, with a particular emphasis on female-headed households.

• The Government of Jordan should reassess issuing work permits for Syrian refugees for the market’s formal sector for particular vocations based on mapping skills among the refugee population and an updated assessment of market needs. This could work, provided it is done correctly, and it would technically mean kicking out Egyptians who provide the bulk of non-skilled labour that Jordanians do not want to do, mainly gas stations, restaurants and collection of waste.

• The Government of Jordan, in order to decrease the likelihood of labour exploitation, should call on international actors to support its efforts in providing oversight over private businesses that are employing vulnerable Jordanian and Syrian men and women.

• The international community should support the Government of Jordan and other actors to ensure that young people from both Jordanian and Syrian-refugee communities have access to capacity-building activities that equip them with the skills needed within the Jordanian market and abroad.

While each of these recommendations could result in improved livelihood opportunities, their feasibility is questionable. Nonetheless, there is no shortage of need assessments and recommendations regarding livelihood strategies. The issue is how UNHCR and others can work with the GoJ to implement these effectively. The basis for this work exists and there is a growing momentum for these to reach fruition. This will depend on how UNHCR develops its relationship with the GoJ, devolves its role in certain sectors, and facilitates the increased leadership and position of other international aid actors with the necessary development expertise. These organisations can then focus on Jordan’s development needs while UNHCR focuses on and amplifies the refugees’ protection and assistance needs.

6.10.3 Are appropriate systems and indicators in place to monitor, measure, or assess impact? 

There are duplicate, competing and sometimes contradictory indicators for various aspects of the Syria response in Jordan. This, as with the differing and changing objectives, causes a lack of focus and can promote indicators that match what has happened rather than progress towards common objectives.

Additionally, the objectives and outputs included in the RRP lack alignment with UNHCR’s internal results framework, causing a dilution of their management strength and increasing unnecessary reporting requirements.

For the health sector, monitoring and evaluation capacities could be strengthened. The establishment of a health information system in Za’atari, is in principle, a good decision, but it is facing challenges due to lack of capacity (human resources) to deal with data at a country office level and the delays associated with data transfer to and between HQ. Weaknesses of the Jordanian Health Information System, especially in disaggregating data on Syrian refugees, limit adequate monitoring of progress towards objectives as well.

At the same time, most respondents have seen significant improvements in this area. This is reflected in qualitative data:

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168 This includes responses to this question’s sub-questions on various sectors and activities.

169 This statement is recurrent in the interviews with sector stakeholders (UN, NGOs, MoH) and was confirmed within UNHCR.
In the light of this, while there have been problems in the past, UNHCR is making satisfactory progress towards harmonised indicators and that will better monitor, measure and assess impact.

6.10.4 **Is there evidence that refugees recognise how UNHCR and its partners’ actions intend to meet their protection and assistance needs? (4.3)**

There is evidence that refugees recognize and appreciate UNHCR and its partners for the assistance they provide. Surveyed households nearly universally see registration as important and positive. The same surveyed households show some difference in when they received assistance:

![Graph 30](image)

**Graph 30**

The same respondents state that UNHCR was the primary provider of this early assistance. When asked about the way different groups work with them most respondents were positive:

170 This was an open-ended question to see who they might name. UNHCR was by far the most common answer. See “Data & Analysis Report; Jordan” included as a separate Annex.
This is remarkable given the nature and difficulties faced by the refugees in Jordan.

However, this data remains incomplete. With approximately 80% of refugees residing in non-camp settings, it is not clear whether they have adequate understanding of how UNHCR and its partners provide assistance. They are more likely to gain information from dispersed and sometimes wrong or contradictory sources.\(^\text{171}\)

UNHCR could be more proactive, systematic and effective in the way it seeks out and responds to refugee feedback.\(^\text{172}\) While some initiatives in this regard, including participatory needs assessments, have been noted, this is a vital source of information for UNHCR and its partners and could be expanded. Feedback is often solicited, especially at different sector levels, but there does not seem to be a systematic approach to this important source of information. The Inter-agency Information Portal, or a subsection of it, would be an obvious way to collect and disseminate such feedback.

**Recommendation 14**: Develop a section of the Inter-Agency Information Portal to collect, organize and disseminate refugee feedback. This should include a standard set of questions and methodologies that all partners could be encouraged to use. This would allow for the aggregation of results into a periodic report that could be used for sector analysis and decision-making.

### 6.11 Sustainability

Sustainability relates to both whether UNHCR can continue to delivery protection and assistance to refugees and what needs to be different going forward. On the first point, UNHCR can continue to provide assistance. There is work to be done. Better strategic planning and thinking will enable UNHCR to better assess risks and breaking/tipping points in its operations. A greater focus on cost-effectiveness and efficiency will increase its impact, while ensuring that it is maximising available resources. Addressing various technical issues in each sector will ensure that refugees’ protection and assistance needs are met adequately and equitably.

These should all be considered in relation to UNHCR’s effectiveness to date. It has largely met its stated objectives. It has largely proven its sector approach, and partners tend to respect and appreciate UNHCR’s leadership.

While UNHCR has moved a bit beyond humanitarian assistance, it is now in a good position to transition. If it devolves its role, focusing on core humanitarian competencies and turning over funding, coordination, and implementation responsibilities to other organisations and as aligned with the GoJ, UNHCR will be even better placed to sustain sufficient levels of quality in its work.

#### 6.11.1 What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ protection and assistance needs in Jordan & Lebanon? (7.2)

There are several variables, as analysed throughout this Evaluation, that contribute to and/or constrain UNHCR’s capacities going forward. Key issue include:

**Strengths**

- UNHCR’s proven leadership and coordination, including the sector approach.

\(^{171}\) This is confirmed in “Lives Unseen: Urban Syrian Refugees and Jordanian Host Communities: Three Years into the Syria Crisis.” CARE International April 2014. For a profile of refugees in non-camp settings and their reported needs, see: “Syrian Refugees Living Outside Camps in Jordan: Home Visit Data Findings.” UNHCR, March 2014. This is an important foundation for greater work in non-camp settings.

\(^{172}\) This responds to evaluation question 4.3.1.
UNHCR’s registration system.
- Improving capacity to organise and aggregate information from multiple assessments.
- Online information portal.
- Adaptability and flexibility, albeit without good fiscal discipline and solid financial management.

Constraints
- Need to re-focus on protection.
- Bilateral nature of relationship with GoJ.
- Unpredictable funding.
- Lack of strategic planning and focus separate from the appeal process and how this links with continuous learning and improvement.
- Lack of unified, coherent and static objectives and indicators.
- Long-term nature of some sectors and service areas that go beyond UNHCR’s core competencies.
- Complexity and challenges of reaching refugees in non-camp settings.
- Number of implementing partners and the variance in their expertise and quality.
7 Lebanon: The Struggle to meet Increasing Needs Amidst Complexity and Underfunding

In early 2013, there were 130,799 Syrians registered with UNHCR in Lebanon. In April 2014, over one million Syrian refugees had registered with UNHCR in Lebanon. Lebanese officials estimate the total number of Syrian refugees to be over 1.5 million, i.e. over 30% of Lebanon’s population. Virtually all of Lebanon is affected by the spillover effect of the Syrian crisis. Tensions threaten to undermine Lebanon’s fragile cohesion and political stability. Syrian refugees are dispersed in over 1,700 localities. This also adds to the complexity of identifying and responding to needs, which are different in each location, and it requires considerable time and resources. These locations differ greatly in terms of geography, economy, confessional communities, political affiliations, local governance, infrastructure and resources. Due to competition for livelihoods and public services, an estimated 1.5 million Lebanese in hosting communities are considered to be affected by the refugee influx and therefore included in the 2014 humanitarian appeal (RRP6).

The context in Lebanon is worrying as living conditions become increasingly more desperate, while Syrian refugee numbers continue to rise. With the increase in population, reduced access to less expensive commodities from Syria and the injection of cash and food/cash vouchers, the prices of basic services have soared. The rising demand for rented accommodation - the most pressing need of refugees - has caused rents to rise dramatically. Though considered a middle-income country, one million Lebanese (a quarter of the population) were classified as poor, living on less than $4 a day before the crisis began in 2011. The World Bank’s 2013 Economic and Social Impact Assessment (ESIA) of the Syrian Crisis on Lebanon estimated that 170,000 Lebanese had been pushed into poverty by the Syria crisis and predicted that, by the end of 2014, 3.15 million of Lebanon’s 4.1 million citizens would be in need of some form of financial, shelter or food support. 173

A protracted and underfunded crisis in a high-cost and fragile environment

With no end in sight to the crisis in Syria, a protracted refugee situation and increasingly difficult conditions in Lebanon, Lebanese hospitality is dwindling. In the first half of 2014, the stream of refugees from Syria into Lebanon showed no sign of easing. On average 50,000 refugees were arriving monthly. This trend only declined in September 2014, with 31,050 Syrian refugees registered and a further 24,250 requesting

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appointments. In October 2014 there was a steep drop in the number of Syrians crossing into Lebanon. The government had announced that new criteria for admission will apply to Syrian refugees. Though such criteria have not been clearly defined yet, restrictions at the border are already being implemented, resulting in a significant decrease in the number of new arrivals.

The on-going influx and movement of refugees between different areas has turned responding to the rising needs and understanding needs and gaps into a challenge. Most refugees arrive with very few belongings and in increasingly worse conditions, while those who have been in Lebanon for over two years find it harder to cope with rising costs, depleted savings and the difficulty to secure a regular income: they are increasingly reliant on the humanitarian community.

The international response to this humanitarian crisis is officially led by the Government of Lebanon (GoL), in partnership with UNHCR as lead UN agency. The response to the refugee crisis was in many ways initially delegated by the government to UNHCR and its main counterpart, the Ministry of Social Affairs (MoSA), whose capacity is limited. Insufficient and reduced funding is having an impact on the viability of the current response model and the UNHCR’s ability to meet existing needs.

The level of funding in response to the influx of Syrian refugees in Lebanon is considered extremely low. Given the protracted nature of the crisis, the Evaluation found that one of the main challenges of the operation was to respond appropriately in a high-cost and increasingly expensive environment. In January 2014, the donor conference in Kuwait raised only $2.3 billion in pledges to help Syria’s neighbours cope with the refugee influx, far short of the target figure of $6.5 billion.

Regional Response Plan (RRP6) requirements for Lebanon are estimated at $1,515,491,900. In September 2014 funding contributions covered only 36% of the appeal, leaving a 64% gap. The overall Syria Regional Refugee Response Plan is comparatively better covered, with over 53% of requirements funded.

Despite funding shortfalls, the RRP6 was still considered the best appeal instrument in Lebanon to mobilise resources. The hesitancy towards funding in Lebanon is in part due to the political problems the country has endured in the past year, and donor concern regarding caretaker government capacity and state channels. The Evaluation found that there was scepticism of other mechanisms including the World Bank multi-donor trust fund designed to support Lebanese communities hosting Syrian refugees.175 While overall

174 See Interagency Protection Lebanon Dashboard September 2014. September was the month with the lowest number of newly registered refugees since the beginning of 2014 and represented a 40% reduction compared to new registrations in the first few months of 2014. At the same time, the average waiting period countrywide went from 9 to 31 days.

175 As part of a four-track approach focusing on alleviating the impact of the crisis as well as addressing longer-term needs of vulnerable communities, the Fund was established in early 2014 and aimed to attract between $300 million to $400 million in donations for the most urgent priorities, including education and poverty reduction.175 To date, the Lebanon Syrian Crisis Trust Fund (LSCTF) MDTF has only received contributions from Finland, France, and Norway, as well as the World Bank-administered State and Peace-Building Trust Fund (SPBF), all estimated at US$30 million. The Fund only launched its first project in September 2014, with the signing of a US$10 million grant to municipalities most affected by the influx.
development funding has been limited, the evaluation found that the main development donors in Lebanon preferred to channel funding through aid agencies and mainly through UNHCR.

The rest of this report includes findings and analyses of conclusions as organised by specific sectors and evaluation levels. All evaluation questions have been answered, while some have been moved or merged for clarity and brevity.

7.1 Protection

7.1.1 Is protection recognised as a critical element that is associated with all aspects of refugees’ lives rather than as a separate programmatic element? (7.1)

The evaluation found that protection is recognised as a critical element of the response in Lebanon. This is evident from the qualitative data gathered by the Evaluation, as well as other data:

This shows a clear positive trend, which is supported further by evidence from the post-field phase survey. (Graph 36.)

However, such recognition in all interventions is uneven. It is not evident that protection informs all, or even the majority of UNHCR’s and its partner’s actions.

In general, there is a tendency, especially by field staff and often by protection-minded INGOs, to relate protection to a matter of ‘women and children’. SGBV concerns have permeated WASH and Shelter more than other sectors, probably because of the particularly sensitive nature of issues surrounding gender, privacy and cultural appropriateness, specifically as regards hygiene facilities in shared accommodation.

In terms of partners, UNHCR appears to have underestimated the needs and requirements associated with mainstreaming protection. This is particularly the case among partners that openly consider that protection is not everyone’s concern, but rather a specialised field to be dealt with by experts.
It was not unusual during the field visits to encounter relevant staff at partner organisations with limited knowledge of refugee protection. In addition, some staff with no direct protection responsibilities declined to respond to general protection questions claiming they were not ‘experts.’

Most criticism by respondents addressed partner capacity in protection and the fact that providing assistance takes the upper hand. Overall, while discourse on ‘mainstreaming’ and ‘cross-cutting issues’ is prevalent, understanding the impact that virtually any intervention can have on protection requires additional attention and analysis. This is not yet apparent on the ground.

Protection issues are taken into consideration by the health sector, but concerns have been expressed by partners in the field regarding the difficulties in referring cases and the lack of harmonisation of criteria in different field offices. According to INGOs and the responses of key Syrian informants, protection concerns are not always dealt with adequately.

Although perhaps somewhat late in the response, UNHCR is increasingly committed to ensuring that protection is understood and dealt with as the core issue in the response. Several respondents approvingly reported of on-going discussions on the need and feasibility of agreeing on focal points for protection in each Sector Working Group.

UNHCR is also focusing on enhancing knowledge of protection issues. The implementation of protection training activities for field staff, both from partner organisations and UNHCR, is being developed by a UNHCR partner. While this is unquestionably necessary, it is also important to bear in mind that newly-acquired knowledge may not translate automatically into improved performance.

**Recommendation 1:** UNHCR should increase efforts with all field staff to promote protection as integral to all UNHCR activities through follow-up, on-the-job training and appropriate feedback. Protection mainstreaming, as an activity, should be encouraged and its impact measured. This should contribute to strengthening the understanding that, while not everyone is competent to manage protection cases, everyone should, as a minimum, be sensitive to the possible protection impact of their actions and remain vigilant to identify and refer protection concerns/cases wherever they emerge.

7.1.2 **What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ protection needs? (7.2)**

**Constraints**

Constraining factors include the fact that Lebanon is not party to the Refugee Convention. UNHCR previously operated in the country under a 2003 Memorandum of Understanding (MoU) with the Government of Lebanon (GoL). However, this has become less useful de facto as this MoU was not meant to deal with such a large refugee influx. Negotiations for a new MoU have stalled due to the country’s prevailing political situation. The GoL rejects, in principle, the integration of refugees and does not consider itself a country of asylum but rather one of transit. Moreover, the national legal framework is weak in terms of gender legislation and family law, and the technical capacity of national institutions is limited.

The refugee issue is highly politicised in Lebanon. This has been particularly evident in the recurrent debate on the establishment of refugee camps, which is favoured by one political front and strenuously opposed by another. In specific geographical areas, UNHCR’s work is particularly sensitive and requires particular caution in terms of interaction with local political entities.

Resettlement options are also limited. The UNHCR RSD/resettlement unit is strained by random offers of resettlement sites that make it difficult to properly organise and plan.

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176 See efforts GPC’s Protection mainstreaming Task force co-led by IRC.
The sheer number of refugees and their dispersion in over 1,700 different locations also constitute major obstacles to identifying and addressing protection needs. The insufficiency, and especially the unpredictability, of funds has prompted short-term thinking and negatively impacted the response.

Furthermore, refugees mainly view UNHCR as a service provider. Identification and referral of protection cases can be difficult due to the reluctance of refugees to seek support for issues perceived as belonging to the private sphere, to be dealt with within the family or the community.

While security concerns have not affected the overall response at the country level, they have hindered protection work in specific, but critical areas, particularly in regions close to the border with Syria. This has prevented UNHCR and its partners from gaining access to refugees, often for extended periods of time.

With a few notable exceptions, the majority of IP/INGOs did not have previous experience in the country (although some were briefly in Lebanon in the wake of the 2006 conflict), or knowledge of the Syrian context. Before the conflict, the presence of INGOs in Syria was limited and their work highly regulated. The limited capacities of international staff in the field constitute another constraint. The presence of junior staff in key positions seems to be a feature of the humanitarian environment in Lebanon. In terms of UNHCR staff, there are remarkable differences in the capacities of staff in similar positions, particularly in the field offices. It is understood that UNHCR faced human resource constraints in scaling up the response. However, this cannot justify the appointment to some sensitive positions of field staff who, by their own admission, have neither the experience nor the skills to fulfil their duties.

Human resources also appear inadequate for the demands put on staff for RSD/resettlement. Difficulties seem to exist in Zahle, which has the highest number of registered refugees and the largest backlog.

**Enabling Factors**

So far, access to Lebanese territory has been largely unhindered. This allows refugees to reach safety and enables UNHCR and its partners to set up an effective humanitarian response. Long-standing socio-economic and cultural ties have meant that refugees have been well-received by the local population. Moreover, they are not confronted with cultural or language barriers. Although Syrian refugees require a permit to work in Lebanon, they are de facto not penalised for working illegally.

Despite political uncertainty and turmoil (e.g. at the height of the crisis in 2013 Lebanon had an interim government), UNHCR has managed to maintain dialogue with institutional actors, particularly key actors in terms of protection, namely the GSO and MOSA.

UNHCR has a unique capacity when it comes to carrying out significant and complex activities, such as large-scale registrations. Protection work is supported by the development of accurate mapping, detailing all locations with refugee presence.

UNHCR further benefits from highly committed and competent staff in senior positions and excellent protection staff. The Evaluation team witnessed impressive examples of the dedication of field staff, both international and national.

UNHCR also has a number of well-established and respected national partners with technical expertise and long standing experience of outreach work, especially important in a country with a tradition of CBOs and civil engagement. Some NGOs have long-term experience in the country, strong institutional memory, and excellent understanding of the local context.

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177 HH survey data.
Its decentralised structure contributes to bringing UNHCR closer to refugees, facilitates outreach and enhances understanding of both local contexts and factors affecting vulnerability.

### 7.1.3 Do refugees have sufficient information/knowledge that supports their protection needs in Lebanon? (7.1.1.)

While acknowledging the critical role that information plays in protection, UNHCR is also well aware of the particular difficulties of ensuring refugee access to information in non-camp settings.\(^\text{178}\)

Communication and information work is greatly facilitated by the fact that Syrian refugees face neither cultural nor language barriers in Lebanon. However, the sheer size of the refugee population, its dispersion and mobility, make effective communication highly challenging. Serious concerns have been expressed about the refugees’ access to information, which is essential to supporting their protection and assistance needs.\(^\text{179}\)

UNHCR mass information and communication capacities received critical comments, yet over 80% of the 303 refugees interviewed said that had sufficient information/knowledge that supports their protection needs. In addition, UNHCR came third (18%), after family and friends (together, 70%), in the list of those to whom refugees turn to for information and/or advice. (Graph 37.)

**Protection/Information**

It may be useful to distinguish between the dissemination of information on the one hand, and communication on the other, as the latter is intended to be a two-way process. Regarding the former, the Evaluation team is not aware of the existence of an overall, country-tailored strategy, despite increasing efforts since 2013 to facilitate refugee access to crucial information. Much attention has been rightly devoted to registration as an opportunity to convey information, as well as the presence of IP staff in the centres who may offer information about assistance, service providers and other issues of concern to refugees.

Overall, refugees demonstrated a solid understanding of which kind of assistance different stakeholders are providing.


The most vulnerable refugees are often those who are least ‘pro-active’ and less likely to approach UNHCR and its partners. This may either be because they have some disability, because they reside in less accessible locations, or because they live in a situation of neglect or despair and have limited contacts with others. Therefore, outreach activities geared towards these refugees continue to be crucial.

Communication with refugees, especially regarding operational/implementation issues, seems to have been far from successful. For instance, respondents and many refugees with whom informal interviews were conducted in the field were critical of the roll-out of targeted assistance.

UNHCR was relying on hotlines for information provision. Hotline capacity was, however, considered limited by the range of stakeholders interviewed. For UNHCR, the cost of hotlines and communication modalities in Lebanon was a serious concern and limitation to expanding services.\(^\text{180}\)

Moreover, the inability of refugees to obtain feedback on the status of their resettlement file was also reported by both UNHCR staff and an operational partner that was occasionally asked by refugees to ‘intercede’ with UNHCR to obtain information.

While posters, leaflets, videos, the Internet and social media can play an important role in the provision of mass information, they should never replace direct, personal contact with refugees. Hotlines are a useful example. Both respondents and refugees mentioned difficulties getting through to the hotline.

There is a strong component of empathy and solidarity in humanitarian work, in which direct interaction with refugees is of particularly vital importance.

**Recommendation 2:** Develop a common, countrywide communication strategy for protection that includes both the dissemination of relevant information and structured, consistent and widespread communication about protection with refugees and community leaders.

### 7.1.4 Do refugee women, girls, boys and men have equitable access to protection, including access to territory? (1.3)

As several UNHCR staff members and partners pointed out, the protection concerns in Lebanon are not those “typical” in refugee crises, i.e. issues of access, refoulement, detention, etc. In this context, ensuring equitable access has meant sustained efforts to promote registration, information dissemination and a consistent scaling-up of protection monitoring and outreach work.

Tensions and violence against refugees have reportedly been on the increase. The Lebanese Institute for Democracy and Human Rights (LIFE), a local non-governmental group, documented 24 violent attacks against Syrian refugees in September 2014. Human Rights Watch documented 11 violent attacks in August and September 2014 against unarmed Syrians or those perceived to be Syrian by private Lebanese citizens, including attacks with guns and knives. Witnesses reported that in at least four of these cases, the attacks took place in full view of Lebanese security forces, which did not intervene.

As an increasing number of refugees seek shelter and protection in Lebanon, few organisations have had the experience and capacity to respond to the overwhelming child protection issue in emergency needs.\(^\text{181}\)

As such, partners have focused on delivering protection services and psycho-social support to over 200,000 boys and girls in the country. Beyond the psycho-social distress caused by children’s exposure to conflict and their refugee condition, significant concerns facing Syrian children in Lebanon include: separation of

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children from their families, physical violence and verbal harassment, sexual violence against children, child labour and limited capacity and access to child protection services.  

Due attention is being paid to ensuring that access to protection for individuals at risk or otherwise more vulnerable is facilitated from the point of registration. For example, fast-tracking of UAM in the registration and referral process, or the mobile registration of persons with special needs or those in detention, ensure that the most critical protection issues are identified upon entry.

Work is being done to ensure that adequate information is available for those who have already experienced protection issues since arriving in Lebanon. The existence of the ProGres database and the RAIS system helps consolidate registration data and information gathered during home visits and through community centres. While ProGres is the registration database used by UNHCR with data that is not shared with external partners, RAIS is a tool that is available to all partners (who have complete access to the database after having signed a confidentiality agreement) to records information on assistance.

How are refugees' rights recognised, respected and protected? (1.3.1)

As Lebanon is not a signatory of the Refugee Convention and has no national legislation dealing with refugees, Syrian refugees have no status other than that afforded to Syrian nationals in general. The GoL has consistently maintained, long before the Syrian crisis, that Lebanon is only a country of transit for refugees, rather than a country of asylum.

While access to territory per se has not been a significant challenge thus far, refugees are confronted with serious obstacles to maintaining their legal status in Lebanon. This amounts to a serious protection issue.

Syrians crossing into Lebanon through an official border receive an entry stamp, which allows them to remain in the country for six months. UNHCR has successfully advocated six additional months free of charge. Syrian refugees were accordingly offered legal stay in Lebanon for up to a year free of charge. However, after one year in Lebanon, refugees have to pay approximately US$200 to renew their residency. Those who enter Lebanon irregularly, through a non-controlled border, can, in principle, regularise their presence though the payment of a high fee. However, costs are unaffordable for a large number of refugees and UNHCR estimates that up to 30% of the Syrians who have entered Lebanon legally and registered as refugees with UNHCR later became illegal aliens due to their failure to pay residency fees.

Although residency status is immaterial for the purposes of UNHCR protection and assistance, it nevertheless has implications: it limits refugees’ freedom of movement for fear of being arrested and deported. It prevents them from accessing civil documentation, including the registration of marriages and births, thus putting the latter at risk of statelessness. It forces some to make risky journeys to Syria and then re-enter Lebanon to obtain a new one-year entry stamp or to register their new born children. The General Security announced last August new measures giving the refugees who had overstayed their residence permits or entered the country through irregular borders, the possibility to regularize their position, and obtain temporary permits, free of charge. This was the result of UNHCR persistent advocacy over several months and concrete assistance to the GoL in the process of renewal and regularization of permits.

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183 See UNHCR Note on Renewal and Regularization of Legal Residency for Syrians; 15 April 2014.
184 Vulnerability Assessment for Syrian Refugees (VASyR) revealed that in 2013, 72% of refugees were unable to meet their basic needs.
185 Interview with UNHCR senior protection staff.
The numbers of arrests and detentions of refugees are relatively few and allegedly do not occur without links to political and religious allegiances or perceived affiliations. Refugees are usually released, although some may be served with a deportation order. UNHCR respondents nevertheless confirm that this is almost never executed. UNHCR provides protection and assistance to detainees through a well-established system run in cooperation with national NGOs, which was already in place before the Syrian crisis and had been used mainly for Iraqi and Sudanese refugees.

Evictions and/or the threat thereof are a growing concern. These are generally legal and a consequence of a refugee’s failure to pay rent. There is no denying the disproportionate demand for shelter in a completely unregulated market as well as issues of unwillingness among local communities/individuals to accept refugees in their neighbourhood. Evictions have wide-ranging consequences on protection. For instance, they can cause secondary and tertiary displacement, with consequences on access to healthcare, education, etc., in addition to forcing refugees to repeatedly adapt to new environments.

What contributes to and/or constrains refugees’ ability to access Lebanese territory? (1.3.2)

While refugees’ access to Lebanese territory has been unhindered since the beginning of the crisis, there are cases of entry being denied. Such incidents reportedly concern refugees with damaged identity documents, unaccompanied minors who cannot prove that they are travelling with the consent of their parents and/or have family members in Lebanon, and, increasingly, Palestinian refugees from Syria (PRS).

Palestinian refugees fleeing the conflict in Syria have been subjected to a separate policy in Lebanon. Visas were both expensive and granted a more limited duration of stay, rendering Palestinian refugees particularly vulnerable as they struggle to maintain a valid legal status. Moreover, they run the risk of becoming ineligible for civil registration or losing access to certain Palestinian refugee camps. PRS who had been in Lebanon for less than one year could only extend their visa for a period of 3 months and no longer. This resulted in many PRS having no legal status in Lebanon and limited their freedom of movement. Some, for fear of being arrested by the LAF, no longer leave the camps.

Restrictions applied to the PRS are now unclear. While policies have changed since 2013, it would seem that the new ones—the latest in May 2014—have been added to the previous ones, rather than replacing them.

The type and complexity of restrictions and requirements, together with a certain degree of arbitrariness by GSO officials, have made it very difficult for PRS to access safety in the territory of Lebanon. At the same time, they put those already present on the territory in a very critical situation, which includes the risk of detention and deportation. It should be noted that the status of the Palestine refugees—which some refer to as a ‘protection gap’—makes of them a particularly vulnerable group.

When it comes to UNHCR’s response, it has to be noted that, in contrast to Jordan, PRS are included among the target population groups in RRP6 for Lebanon and their needs are referred to throughout the

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186 Informal interviews with refugees from Arsal.
187 RRP6 Lebanon Mid-Year Update, p. 13
189 In April 2014, over 53,070 Palestine refugees had sought safety and shelter in Lebanon.
190 Ibid.
191 Ibid.
document. In this regard, while having its own specific appeal for the Syrian crisis, UNRWA is also part of the RRP. Cooperation between the two agencies was said to be good in Lebanon.

According to RRP6 for Lebanon, 88% of registered refugees in Lebanon have entered the country regularly through official border crossings. Those who entered illegally represent 12% of registered refugees, but likely form a higher proportion of the unregistered.

There are various factors that contribute to how access to territory is managed in Lebanon:
- UNHCR monitors the border both directly and through partners;
- UNHCR is proactive with the Lebanese Government/institutions regarding their responsibilities and advocacy for unhindered access; and
- The GoL and others were previously not positing security first as a justification for denying access.193

UNHCR’s efforts to date include a plan to assist the GoL in managing the border in a protection sensitive manner, with the ultimate aim of facilitating refugee access to the territory and the issuance of residence cards.

Overall, UNHCR advocacy efforts for unhindered access to Lebanese territory have been effective. However, the lack of consistency and/or the perceived lack thereof in the approach at the regional level remain problematic. Advocacy efforts in a country are not furthered if its government perceives that neighbouring states are “free to deal with the refugees as they please.” This was a common sentiment expressed by relevant respondents in Lebanon and confirmed by some in Jordan.

UNHCR maintains a presence at Masnaa Border Crossing and carries out interventions in cases deemed highly vulnerable. A number of unofficial border crossings are also monitored. UNHCR further encourages partners and protection-focused NGOs to be alert and report on such issues.

7.1.5 What is being done to prevent and respond to sexual and gender based-violence (SGBV)? What else could be done? (1.3.4)

The SGBV response has included the reinforcement of health services to victims, the creation of mid-way houses and safe spaces for women. So too has it entailed prevention through community communication and awareness raising, including through the use of refugee outreach volunteers.

According to sector updates, the SGBV response includes:
- Providing safe environments for women and girls through mass communication, community mobilisation, and the establishment of women’s resource centres and of listening and counselling centres;
- Improving outreach to refugees, including through mobile activities to ensure identification and safe referral of SGBV survivors and those at risk;

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193 As of August 2014, clashes in Arsal and killings of LAF personnel have bred increased antagonism towards the refugees in all of Lebanon’s communities.
- Strengthening existing specialised services for SGBV survivors such as psycho-social, medical and legal services;
- Promoting engagement with men and boys in SGBV prevention and response;
- Strengthening key partnerships with UN agencies, NGOs, the government, and local communities to reinforce SGBV prevention, response and coordination mechanisms; and
- Using integrated programming to mainstream SGBV prevention and response into all sectors, in particular shelter, WASH and child protection.

While SGBV includes men and women, as well as girls and boys, women represent a particular challenge. Roughly half of the refugee population in Lebanon is female, while 11% of households are female-headed. 194 25% of the survivors of reported SGBV cases are under 18 years of age. 195 UNHCR exhibits a strong focus on SGBV, and respondents believed that the organisation is committed to ensuring that gender concerns are mainstreamed in all sectors/activities.

Some of the achievements as of mid-2014 appear to fall short of set targets. 196 (See Graph 38.) In the Mid-year Update 197, the protection indicators were modified, rephrased, added and split, so as to render comparison extremely difficult.

When it comes to SGBV programming and consequently its achievements, these may not be entirely a matter of the strong commitment of UNHCR and partners to this specific protection issue. There are a number of reasons for this: contextual elements and external constraints, issues surrounding capacity in a broad sense, and the attitudes of donors, an aspect with a key influence on programming choices.

First of all, the identification of protection cases depends on the willingness of the survivor or individual at risk to come forward. This cannot be taken for granted when it comes to SGBV and does not necessarily relate to a “restrictive culture”, as claimed in an IP document.

While UNHCR guarantees ethical referral and appropriate case management at its level of competence, limits nevertheless exist. These are posed by the weakness of applicable legislation, the limited availability of ad hoc structures, and the objective difficulties in formulating long-term solutions. Alongside UNICEF, UNHCR is working to increase the availability of safe spaces and halfway houses for female victims of violence and abuse. 198 However, as a UNHCR respondent conceded, resettlement remains the most appropriate and often the only choice for the most serious SGBV cases.

In terms of capacity, it appears that basing SGBV interventions on sound analysis is challenging. The Multi-Sector Needs Assessment (MSNA) report reveals that “while age, gender and geographical disaggregation is available through the registration data, few assessments presented data disaggregated by sex and age.” 199 The lack of disaggregated data, or the failure to use it (RRP6 for Lebanon refers to “women and children” as comprising 78% of the registered refugees) makes gender analysis and meaningful programming difficult.

195 SGBV monthly update, UNHCR Lebanon July 2014.
197 IBID.
198 UNHCR respondents.
A number of activities are implemented in communities as a part of the SGBV programme: awareness-raising sessions; an information campaign on SGBV and referral pathways; vocational and life-skills training; and psychosocial activities. As a part of the effort to respond to and prevent SGBV, training is delivered to frontline service providers.

There is no doubt about the usefulness of such activities and the benefits that women derive from them in terms of improved knowledge, relief from a sense of isolation, and the possibility of receiving concrete support through referral. However, it is not evident that these activities (a) meet the most pressing needs of the most vulnerable women, or (b) that this approach has a meaningful impact, in the medium- and longer-term, in terms of mitigating vulnerabilities and/or preventing negative coping mechanisms.

In terms of (a), an NGO respondent commented that “getting women together to socialise and learn something is nice, for three months; but then they have to pay the rent”. This statement precisely embodies the kind of contradictions the SGBV programme must tackle and address in a satisfactory manner. Exposure to SGBV is strongly linked with economic vulnerability. However, and despite the good intentions of participatory approach policies and practice, this tends to be underestimated in both programming and response. As for (b), given the (often justified) discontent regarding a quantitative approach to evaluation, which cannot capture the complexity of protection work, there is no reason why a different, more qualitative approach cannot be adopted. This, however, requires going beyond anecdotal feedback from participants about their appreciation for awareness session/training/psychosocial support sessions. It requires medium/longer-term follow-up to gauge whether, for example, refugees have had the opportunity to use the information conveyed through awareness sessions; or whether and how psychosocial support has helped them in concrete terms (e.g. whether to confront a specific situation or to make decisions, etc.).

Considering how relevant the role of partners is in the assessment of needs and the design of concrete responses, UNHCR should directly pursue, and strive for partners to meaningfully contribute to, a sound contextual analysis, so as to take into account the pre-conflict context. Need assessments and surveys often convey the impression that refugees came into existence, together with the legal definition of their status, at the very moment they crossed the border. It is critical to understand the reality from which women and men hail, how their situations and roles have changed, whether any pre-existing protective mechanisms and structures exist, or whether others have replaced them.

UNHCR should be able to count on relevant expertise in terms of support from the Gender Advisor in Amman or by appointing an additional expert for Lebanon—not just to ensure the mainstreaming of gender concerns, but also to help in consistently translating the understanding of gender vulnerability and violence into meaningful programming.

### 7.1.6 What is being done to protect children from neglect, abuse and violence? What else could be done? (1.3.5)

53% of the refugees in Lebanon are under 18 years of age. Overall, child protection efforts are reasonably effective. By mid-2014, the main child protection targets had been met or surpassed. These include individual support to over 3,200 children, as compared to the initial target of 2,500.

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200 UNHCR Lebanon Sexual and Gender Based Violence (SGBV) Updates; 2014 Syrian Regional Response Plan. Mid-year Update.

201 Woman Alone. The fight for survival by Syria’s refugee women. UNHCR Lebanon, (July 2014).

202 Key findings of consultations with Syrian refugee men, women, boys and girls of different ages and diverse backgrounds in Mt. Lebanon, South Lebanon, Akkar and Tripoli. UNHCR Lebanon. Community Development Unit (March 2014). A community-based approach in UNHCR Operations. UNHCR, 2008.

Unaccompanied minors are fast-tracked for registration and referral. Both UNHCR and ICRC respondents confirmed that cooperation is regular and effective with regards to a relatively limited caseload of family tracing and reunification.

UNHCR continues to work on mainstreaming child protection across all sectors, improving outreach and enhancing partner and service provider capacities. A guidance document has been developed to ensure consistency and effectiveness in child protection case management. As noted, by mid-2014, UNHCR and partners provided individual support to over 3,200 children, surpassing the initial 2,500 target.

Unlike in the case of SGBV, child protection work benefits from the existence of national legislation and established procedures to deal with children at risk and/or who are victims of violence. This legal and procedural foundation is integrated into child protection work. All procedures/actions are integrated in the existing national system, as far as laws and regulations exist to this effect. UNICEF works with the GoL on legislation and policies, while UNHCR seeks to ensure that the protection concerns of refugee children are duly taken into account. Child protection efforts include the training of refugee outreach volunteers and frontline workers, who are essential to ensuring appropriate referral.

In general, there is sufficient focus on psychosocial activities. These are understood as “processes and actions that promote the holistic wellbeing of people in their social world. It includes support provided by family, friends and the wider community as well as formal programs by NGOs or government agencies.” As of September 2014, psychosocial support had been provided above 2014 targets to over 335,000 children and over 70,126 caregivers as of mid-2014.

Nevertheless, the quality and impact of many psychosocial projects could be better defined and the actual results clarified. The types of actions classified as psychosocial is so varied that real results are often diluted. For instance, it is not clear that recreational and sport activities, while important, are as important as those that provide clinical support to refugees suffering from the trauma of violence and loss. Similarly, child-friendly spaces are given prominence, while other more difficult activities (albeit with the potential for more positive impact) appear less prominent, e.g. male youths who experienced combat in Syria. This may be one reason that protection case management is unattractive to so many partners. Such management requires an additional level of commitment and anticipates poor quantitative outcomes.

**Recommendation 3:** Ensure that child protection activities address the most vulnerable and difficult cases and that there is a sufficient balance between these and other cases. Ensure that donors are informed about the need for a balanced approach. This should include an in-depth analysis of children’s vulnerabilities and the consideration of alternative, and possibly more effective, approaches to their needs. This should build on the agreement between UNHCR and UNICEF and their respective roles, e.g. UNICEF’s focus on emergency psycho-social interventions for refugee children including child-friendly spaces in registration centres and informal settlements and UNHCR’s focus on establishing emergency care procedures, alternative care arrangements, and reinforcing social workers’ skills and outreach capacities.

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204 RRP Lebanon. 2014 Mid-Year Review.
207 Interagency Child Protection Lebanon dashboard September 2014.
7.1.7 Do the most vulnerable host communities benefit from improved access to quality essential services and access to livelihood opportunities, thereby ensuring that an increased number of refugees benefit from community based protection? (Protection) (1.4)\(^{208}\)

Overall, most respondents expressed satisfaction with how UNHCR is working with essential services and livelihood opportunities:

Qualitative Evidence: Do the most vulnerable host communities benefit from improved access to quality essential services and access to livelihood opportunities, thereby ensuring that an increased number of refugees benefit from community based protection? (EQ 1.4; Protection; ALL RESPONDENTS)

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 |
| 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 |
| 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 |   |   |   |

37% Positive
19% Negative

By the end of 2013, a joint exercise by the Prime Minister’s Office, UNHCR and UNICEF identified approximately 200 communities with the highest concentrations of poor Lebanese and Syrian refugees. These communities are being targeted as a priority for activities aimed at improving the availability of services and access to livelihood opportunities for both refugees and host communities.

UNDP has co-led the Social Cohesion and Livelihoods sector with UNHCR and has a Stabilization and Recovery Programme in Lebanon that intended to intersect with the RRP6, focus on the 220 most vulnerable Lebanese communities and contribute to Lebanon’s stability by strengthening the resilience of the most vulnerable host communities and key national institutions, linking crisis response to long-term development objectives.

UNHCR has been advocating for stronger leadership by UN agencies and partners, including the Government, involved in stabilisation and long-term development plans. This is to ensure that the humanitarian response, which cannot address the overall impact of the Syrian crisis on the Lebanese economy and society, is closely linked to other efforts to stabilise the country. In this respect, a number of activities envisaged under the Government’s National Stabilisation Roadmap with an immediate impact have been reflected in RRP6. Specifically, the Office seeks to strengthen the capacity of authorities to deal with the influx of refugees, to mitigate some of the negative effects of their presence, and to provide support to communities where refugees are hosted.

Concern about the impact of the refugees’ presence in Lebanon is increasing, as the influx shows no sign of abating. It is evident that this large refugee presence puts pressure on national resources and services. Competition for livelihoods and jobs in the informal sector between the refugees and the most vulnerable Lebanese citizen is considerable, while the sudden increase in labour supply has negatively impacted wages. At the same time, the poorest Lebanese resent the support provided to refugees and feel that they are discriminated against.

There is a generalised perception that “tension is rising.” This was confirmed by the majority of respondents. While, the implication of “rising tensions” is largely unclear, curfews have been imposed on refugees in an unknown number of villages.\(^{209}\)

\(^{208}\) This responds to evaluation questions 14.1 and 14.2.

\(^{209}\) Lebanon RRP6 Monthly Update - Community Development, May 2014.
Progress against RRP objectives for social cohesion appears slow, except in terms of the number of people who have benefited from Community Support Projects (CSP), which is over twice the initial target. This is not surprising considering the complexity of the issues being addressed, the level of involvement and consensus required from both national and local authorities, consultations and negotiations with the communities, and the mixed expertise and experience of UNHCR and its partners.

**Recommendation 4:** While a great deal of work is being done, a more comprehensive and detailed strategy should be developed for social cohesion in Lebanon. Various initiatives have been launched and will surely have an impact. However, they are not coordinated effectively nor are their targets and expected results sufficiently harmonised to ensure appropriate coverage and positive impact. This social cohesion strategy should account for the complexities associated with different contexts/locations and the varying ways in which local and national government entities can be engaged. This should include refined indicators and monitoring systems to ensure that mid-term adjustments can be made. This is particularly important given the potential conflicts that could emerge between refugees and host communities. As social cohesion remains an important protection objective it should be established jointly by UNDP and UNHCR.

### 7.1.8 What practical steps have been taken to foster reflection and coordinate policy and interventions in support of mixed refugee and local communities? (14.5 & 14.2)

Humanitarian actors in Lebanon report growing frustration among host communities who feel neglected in the face of support exclusively targeting refugees. Syrian refugees are mainly concentrated in peripheral areas that are historically poor, thereby exacerbating their already difficult living conditions.

The UN has established an Inter-Agency Task Force led by UNDP to reduce tensions between refugees and host communities. RRP6 has sought to support and sustain stability in the areas affected by the Syrian crisis through the conflict-sensitive provision of livelihoods and services.

Plans to include the most vulnerable host community members under a cash assistance programme through a World Bank – MoSA project are destined to help ease tensions. As the Government remains opposed to the cash distribution, vulnerable Lebanese families will not benefit from cash assistance per se. The cabinet however decided to extend the NPTP to provide vulnerable Lebanese families with US$ 30/person/month food e-voucher to allow them to procure food using the same mechanism put in place by WFP for the Syrian refugees.

The UN Task Force on Support to Lebanese Communities, co-chaired by UNDP and UNHCR, has brought some twenty UN agencies, NGOs and government representatives together to develop a better

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210 RRP6 Lebanon- Mid-Year Update.
211 Lebanon RRP6 Monthly Update- Social Cohesion and Livelihoods, June 2014.
212 UNHCR committed to support this programme for US$ 3 million (US$ 1.5 million in 2014 and US$ 1.5 million in 2015). The distribution started in November 2014 and throughout the next year, 5,076 families will have benefited.
understanding of needs and responses, including the development of the broad frames of a strategic response for affected communities.

Within the RRP framework, the Joint Working Group on Social Cohesion and Livelihoods has, after delays in its formation, begun to operate effectively. The Group is co-chaired by UNDP, UNHCR and a government representative. UNDP has had to strengthen its capacity to coordinate and take the lead in this sector.

RRP6 places significant emphasis on support to Lebanese communities and on enhancing the capacity of government institutions. Some 25% of funding was intended for the needs of vulnerable Lebanese. The mid-term review of RRP6 reveals that all sectors are decreasing their appeals, except education (+11%), NFIs (+15%) and social cohesion and livelihoods (+15%). The latter appeal is now at US$ 118,639,362, equally split between social cohesion and livelihoods. It is the fifth-largest sector appeal. The main partners are ACTED, DRC, IRC, UNDP and UNHCR. The UNDP appeal now stands at US$34,000,000, making it the largest funded partner in the sector.

Agency reports increasingly highlight how tensions between Syrian refugees and their Lebanese host communities have led to intercommunity clashes. A number of studies have been undertaken to better focus on social cohesion and develop strategies to reduce tension. Donors are increasingly concerned about instability and understanding the need for an increased focus on host communities. A number of donors continue to favour funding UNHCR considering it the best vehicle for implementation, including in sectors where the agency has less experience. Many respondents in UNHCR emphasise the importance of these activities for the organisation at a decentralised level as a means of reducing tensions and enabling the agency to pursue its core refugee protection mandate.

Under the RRP, quick impact and short-term community support projects are implemented to support vulnerable Lebanese communities hosting high numbers of Syrian refugees. These projects aim to fill critical service gaps for populations most affected by the crisis and are implemented across all sectors. Between January and May 2014, US$8,700,000 was invested in 136 community support projects in over 164 cadastres. Participatory planning and conflict mitigation mechanisms have been set up in 30 communities. They entail such measures as waste collection trucks and bins for municipalities, rehabilitation of drinking water networks and the purchase of generators, etc.

A three-year initiative, initiated in July 2014, is extending cash assistance to the most vulnerable Lebanese families covered under MoSA’s National Poverty Targeting Programme (NPTP). By the end of 2014, approximately 6,000 vulnerable Lebanese families will have benefited from monthly food assistance.

A notable initiative implemented by UNHCR is the Refugee Outreach Volunteers, who numbered 330 as of April 2014. They are selected from amongst the refugees themselves to act as mediators and early respondents to social tensions.

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213 Swisspeace: Conflict Dimensions of International Assistance to Refugees from Syria in Lebanon (Bern 2013)
A Vulnerability Assessment of Host Communities in 242 of the most vulnerable cadastres and at the community level is being undertaken by REACH/OCHA. With UNHCR support REACH has undertaken Lebanese hosting communities assessments. Other studies on social cohesion include AUB/Save the Children

Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ protection needs? Could they have done anything different given the context in Jordan and Lebanon? (7.3)

RRP5 for Lebanon was funded up to 73%, and in particular 62% of the Protection Sector funding requirements were met. Also, by the end of 2013, refugee population figures (about 858,000) were lower than previously anticipated (1,120,000).

There was widespread appreciation among respondents regarding UNHCR’s extensive efforts to keep up with the challenges entailed in the response. They acknowledged that significant improvements have occurred since 2013, when the sudden escalation of the refugee crisis “threatened to make the whole humanitarian system collapse”, in the words of one institutional interlocutor.

Registration of refugees was rightly considered a priority. After what several respondents described as a slow and uncertain start, UNHCR managed to scale up the response to meet the enormous needs on the ground. This was not achieved without difficulty: for example, in terms of identifying suitable locations and facing the resistance of local communities and institutions. The system put in place is effective and dignified. Particularly vulnerable refugees are fast-tracked, and structures are in place to deal with specific protection concerns. The Evaluation mission was generally positively impressed by the registration facilities, the quality of reception and services offered to the refugees, as well as the motivation and commitment of UNHCR and IP staff.

However, the protracted use of Level-1 registration limited the capacity to identify and address protection needs for many months. The Evaluation team acknowledges that this may have been a necessity given the existing circumstances, but one whose consequences were probably not fully appreciated, especially since refugees were not going to live in camps but would instead disperse all over the country.

Continued and persistent advocacy work has contributed to maintaining a largely positive protection environment. This has included work with MoI to ease procedures related to birth registration. In this regard, mass information and awareness campaigns have been implemented and legal counselling made available through partners, to encourage registration of new-borns, an essential step for preventing the risk of statelessness.

The first step towards addressing needs is accurately identifying them. While the protection needs of detained refugees, for example, may be fairly evident, the specific protection needs of a large and scattered refugee population are clearly harder to identify. UNHCR is putting significant effort into this, especially through the enhancement of the outreach network. With this caveat, the answer to the question of whether UNHCR and its partners meet refugees’ protection needs is a qualified yes. UNHCR and its partners address protection needs as long as they know/understand them.

Systems and procedures exist to promote the consistency of the response and ensure effectiveness. UNHCR has undertaken significant work in terms of guidelines and SOPs.

There is a need not only address needs, but also to understand vulnerabilities in a more in-depth manner to ensure greater consistency.

While the identification and referral systems offer room for improvement, they are generally effective. However, case management remains problematic. Partners are reluctant to take on case management for a number of reasons, probably not least considerations regarding the input-output balance. This has made protection work difficult, as even a perfect referral system cannot thrive without a matching case management system. It is understood that progress is being made in this regard. It is not evident that UNHCR could not have addressed this situation earlier and with more determination.

As the response is heavily dependent on implementing partners, the increasing scale of the operation and the consequent availability of UNHCR-channelled funds resulted in some NGOs taking more projects and
responsibilities than they were reasonably able to manage. Several respondents contended that UNHCR pressured the implementing partners in this sense. While the latter are ultimately responsible for fulfilling their commitments as UNHCR operational partners, the fact remains that scaling up beyond capacity has had implications on the quality of the response with regards to protection needs.

7.1.10 What could UNHCR do differently to strengthen how it ensures refugees’ protection? (7.4)

In addition to the recommendations included throughout this section, UNHCR may consider the following:

There is a strong need for better analysis of protection needs and vulnerabilities. While there is no shortage of surveys and assessments, all too many seem to be fundraising-oriented, meaning that the level of analysis is not especially helpful for the purpose of effective programming. UNHCR should take the lead, and, in collaboration with relevant partners, strive for more purposeful information-gathering and analysis, i.e. which goes beyond a list of needs and is in line with current sector strategies.

Existing monitoring activity on detention, freedom of movement, evictions, etc. should be extended to systematically include also incidents involving security forces/law enforcement agencies or armed actors (e.g. at checkpoints or police stations) or host communities (e.g. harassment and attacks). As there are anecdotal reports of increasing tensions and discontent surrounding refugee presence, UNHCR needs to monitor the situation as closely as possible.

Strengthening contact and working relations with non-traditional partners is essential. This has already been undertaken as part of the efforts to disseminate information on, and encourage, registration. It should be conducted more with reference to SGBV, an especially crucial issue in Lebanon as family law is administered by religious courts.

There is a need to focus more on supporting and strengthening national partners. The arrival of large INGOs, the majority of which have little or no experience in the country, has caused the role of local NGOs to become side-lined. This is resented, especially by NGOs who work not only with refugees, but primarily with host communities and are under significant pressure to justify the perceived preferential treatment that refugees receive, as compared to the local poor.

Communication with refugees must be improved. Communication efforts have thus far been directed more towards donors and public opinion than beneficiaries themselves. Effective two-way communication is essential to ensure transparency and accountability.

7.2 Assistance

7.2.1 What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ assistance needs? (8.1)

Assistance is constrained and enabled by many of the same variables that affect UNHCR’s ability to meet protection needs.

The majority of variables constraining UNHCR’s capacity to meet assistance needs were external to UNHCR and related to the crisis and context in Lebanon.

- The on-going influx and movement of refugees between different areas makes it challenging to keep information on needs and gaps up to date as well as to respond to increased needs. The number of refugees continues to escalate and requires revised planning and adaptation to new scenarios. The geographic spread of refugees in up to 1,700 locations around the country makes it difficult to identify and respond to needs, which are different in each location.
• **Refugee location:** The majority of refugees are within already impoverished areas of Lebanon. This is exerting additional burden on infrastructure and services, and causing serious concerns over the extended hospitality of those communities.

• **Insecurity:** Border security concerns and the political divisions within the country are reducing the areas where refugee accommodation is considered an option.

• **Weak government and political uncertainty:** At the height of the crisis Lebanon had an interim government. The government was not meeting and there was no strategy to respond to the influx of refugees. UNHCR has had to respond in the midst of a prolonged government vacuum, with no government or an interim-government for over a year with limited decision-making. Formed in 2012, an Inter-Ministerial Committee rarely met. The refugee response in 2013 was left largely to the Ministry of Social Affairs (MOSA), UNHCR’s main counterpart, which is under-resourced. As a result, UNHCR has had to engage bilaterally with separate ministries.

• **Limited capacity of the sectors in Lebanon and lack of existing infrastructure and services**

• **Cost of the response:** The high cost of the operation and the refugee/cost in Lebanon

• **Absence of camps:** The Lebanese Government maintains a no-camp policy. Given the “shelter saturation” within most of Lebanon, evictions continue, with hardly any solutions to address them.

External constraints related to the international community’s response include:

• **Lack of funding:** Lack of sufficient funding has been an on-going challenge. This has affected the response in terms of scaling up to meet the needs and delivering services in a timely manner.

• **Partner capacity:** Implementing partner capacity in Lebanon has been a constraint across sectors. Partners have not always managed to scale-up to the level of UNHCR, or have lagged behind. Only one partner was able to absorb winterisation funding at the end of the year.  

• **Limited donor engagement and relatively weak donor organisation.**

• **Weak interface between humanitarian and development aid:** There is confusion among donors with respect to the links between different plans/appeal documents and resources (the RRP, the Stabilisation Plan, etc.).

• **Lack of proactive approaches and engagement on stabilisation by other actors.**

Constraints related to UNHCR’s operation and systems include:

• **Coordination:** The coordination system and mechanisms have been developed as the emergency grew and evolved, often in a reactive way, which means activities are often implemented in an irregular way before they can be effectively coordinated and better planned.

• **Decentralisation** in the absence of a harmonised approach between different decentralised units and vis-à-vis implementing partners; Decentralisation was considered both a constraint and an enabler.

• **Lack of M&E** culture of “evaluative moments” or focus—at least in cash working groups—on implementation rather than strategies and lessons learned. The response was seen to be largely lacking an M&E framework.

• **UNHCR processes:** A number of UNHCR processes, while related to external factors, were regarded as internal constraints. These include the initial low operating spending level; duration and funding

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215 This was mentioned by several sources. The only partner able to channel the funding was DRC, which is UNHCR’s primary IP.
available in sub-agreements were seen as a constraint hindering proper programming. Also, when funds arrive late in the year, which is traditionally the case when donors try to allocate their remaining unspent funding, it is difficult for UNHCR to plan, yet UNHCR rules and regulations force the agency to spend funds within the calendar year. This leads UNHCR to prioritise the type of activities it can finance in time, as opposed to following a needs-based approach and spending funds on what the agency wants to do.

**Enabling factors:**

The Evaluation found that enabling variables were mainly related to UNHCR’s response.

- **UNHCR leadership and relationships**, its open and collaborative attitude were seen as an enabling factor by other stakeholders, including national counterparts.

- **UNHCR’s interaction with the government**: UNHCR has effectively communicated with institutional partners and tried to engage them on all issues of concern and successfully advocate issues that arise at the ministerial level.

- **UNHCR High Commissioner and HQ engagement**: The response in Lebanon is effectively prioritised at the highest level within UNHCR.

- **Use of information management**: UNHCR capacity including key staff and investment in Information Management. The IM-related support in the very beginning of the response was very effective. UNHCR Lebanon has been in the driving seat and through the use of IM, UNHCR has advocated effectively.

- **Decentralisation** is considered instrumental in achieving a more “intimate” knowledge of needs and to have helped tailor responses accordingly.

### 7.2.2 Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ assistance needs? Could they have done anything different given the context in Lebanon? (8.2 & 8.3)

The response in Lebanon has been as complex as the crisis itself. The greatest complexity lies in the dispersion of refugees across the country and into communities that have widely varying and complex socio-economic issues of their own. In this context, it is unclear whether all critical basic assistance needs are being met. With funding less that 45% of the appeal, coverage foreseen in the RRP6 has also not been possible. With the number of newcomers decreasing as of September 2014, additional needs of targeted groups in Lebanon can be met, e.g. winterization.

### 7.3 Coordination

Efforts to improve coordination and respond to stakeholder concerns including those related to the need for dedicated sector leads have borne positive results. Respondents in interviews acknowledge the key role of the dedicated senior inter-agency coordinator. Coordination in 2013 was strengthened by skilled technical coordinators in sectors, separating the coordination role from UNHCR’s implementation role, enhancing data analysis and information management, and a more participatory RRP.\(^{216}\) Concerns related to UNHCR’s coordination role and the refugee coordination model have more to do with (1) stakeholder’s lesser understanding of where decision-making takes place and levels of accountability; (2) the cost of the model with the provision of UN agency sector co-leads in Beirut and double the UN co-lead staff (in lieu of NGO co-leads and more inclusive partnership); and (3) to a lesser extent, uncertainty regarding the ability

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\(^{216}\) UNHCR coordinators at Beirut level no longer bear responsibility for UNHCR programme delivery. Coordinators are located together in one building where non-UNHCR sector coordinators also have offices for greater interaction. The coordination team’s information management unit brings together information management staff from OCHA, UNDP, UNICEF and WFP.
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of the model to adopt good practice from the cluster coordination experience and benefit from IASC guidance. In addition to better staffing, to improve coordination expertise in the operation, training sessions to UNHCR and non-UNHCR staff involved in coordination, both at Beirut and field levels, have been carried out to enhance coordination skills.

The cluster approach to coordination of humanitarian response was introduced with Humanitarian Reform (2005) as one way of addressing gaps and strengthening the effectiveness of humanitarian response through building partnerships. The cluster approach intends to provide clear leadership, predictability and accountability in international responses to humanitarian emergencies by clarifying the division of labour among organizations and better defining their roles and responsibilities within the different sectors of the response. It aims to make the international humanitarian community better organised and more accountable and professional, so that it can be a better partner for the affected people, host governments, local authorities, local civil society and resourcing partners. While UNHCR’s coordination role in refugee situations is recognized in both Humanitarian Reform and in the Transformative Agenda, its model is less planned, known and guidance less developed. The coordination model in Lebanon has largely evolved alongside the response, ensuring coordination in core sectors from the start. This has had the benefit of offering flexibility, but was often too reactive and made planning challenging.

Over 60 partners contribute to the humanitarian response in Lebanon in RRP6. An extensive coordination system is in place, led by UNHCR and the Government. Coordination is across eight main service sectors (protection, food, core relief items, shelter, water and sanitation, health, education, and, social cohesion and livelihoods). Dedicated sector leads drawn from UNHCR and other specialized UN and NGO partners bring together partners to identify priority needs, design and cost appropriate interventions, and monitor implementation. Thematic working groups were also set up to complement the work of the sectors, e.g., on information management, public communication, targeting and cash transfer programming. Sectorial coordination occurs in Beirut to set up nationwide policies and strategies, and in all field locations to operationalize the response taking into consideration the specificities of each region. At the time of the field phase of the Evaluation, UNHCR decentralization had mixed results. Partners raised communication problems and issues related to coherence. Implementing partners did not necessarily have the same capacity as UNHCR in the field requiring Beirut to repeat tasks several times, sending essential staff around for various meetings. The capacity of UNHCR for sector coordination was lower in the field (in terms of both number of staff and their capacities).

UNHCR is mandated to lead and coordinate international action to protect refugees and resolve refugee problems worldwide. Its lead coordination role in refugee situations is recognised in humanitarian reform efforts. UNHCR has sought to further clarify its interface with broader humanitarian coordination systems. As a part of the Transformative Agenda’s efforts to provide “empowered leadership”, Regional Humanitarian Coordinators and country Humanitarian coordinators have been deployed in Level 3 emergencies. Several stakeholders at the regional level felt that the CRSF was intended as a framework that would address some of the shortcomings of the RRP process (mainly cross-border/Syria analysis, prioritisation and transition). The push for the CRSF was seen to be initially donor driven. The Regional HC’s means to deliver against the CRSF’s objectives were, however, regarded as minimal for the task at hand. In the end, the process was considered time-consuming for all actors involved, including UNHCR, with limited results.

On a related note, at the regional level, the UNHCR-OCHA agreement of 24 April 2014 laying out responsibilities for coordination in different settings was unfortunately not seen to provide the requested additional clarity. The regional dimension of crises adds an additional layer of complexity. In August 2014, following a discussion on the declaration of Iraq as a Level 3 (L3) System-Wide Humanitarian Emergency Response for Iraq, closely linked to the Syria crisis, IASC Principals requested that the Emergency Directors
undertake a quick review of coordination mechanisms in the region to ensure that coordination would be kept as straightforward as possible. The review focuses on the need for a well-coordinated ‘Comprehensive Whole of Crisis’ response to the situation in the sub-region and the need for a well-coordinated ‘Whole of Syria’ response both from within Syria and across borders from neighbouring countries; and the need for streamlined coordination to support an ‘All of Iraq’ response, which also adapts to the linkages with the crisis in, and emanating from, Syria. This will not necessarily take into account mandates, agreements or existing capacities in place at the country level.

At the country level, at the time of the evaluation, there was a general consensus on the fact that UNHCR had the lead role in the coordination of the overall response in Lebanon and an established system. The range of stakeholders interviewed understood that issues had been raised at headquarter level, but that there was sufficient clarity in country with an established version of a refugee response coordination model. UNHCR was also undeniably seen to have the capacity and resources in place to lead on coordination.

In Lebanon, UNHCR has been an active member of the Humanitarian Country Team (HCT) and the UNCT chaired by the HC/RC, and has kept the HCT informed on the refugee operation on a regular basis. UNHCR has coordinated with OCHA and the HC. There has been a good degree of collaboration on all sides. Although the humanitarian response in Lebanon results from a refugee emergency, the presence of an HC and HCT have meant that at these levels (HC/HCT) UNHCR has acted as it would in a mixed situation. UNHCR’s Representative or the Senior Inter-Agency coordinator regularly attends HCT meetings. A loose “division of labour” has been defined, where the HC and OCHA are more involved in stabilisation issues and vulnerable host communities and humanitarian issues affecting all of Lebanon. The role of the HC and, at a certain level the HCT, in a refugee emergency would benefit from additional clarification. It is a fine line of separation when the proportion of refugee population in the country is estimated at 30% and an equivalent number of Lebanese are directly included in the RRP, and the potential drawbacks and benefits to transition arrangements to be envisaged should also be better understood. The particular Lebanese context also raises certain questions as to how coordination transition would work in a volatile situation where Lebanese are increasingly included in humanitarian response plans (i.e. 1.5 million Lebanese in RRP6).

In the current overall coordination architecture, the HCT’s role is important for certain stakeholders who consider that it adds a layer of accountability to the response and allows for key players—donors and NGOs—to be better engaged and heard and possibly reach consensus. The current HC’s leadership is valued in the context of Lebanon. The HC supported by OCHA is trying to favour an increased focus on areas with the highest concentration of refugees and poor Lebanese. UNHCR provides ample information in HCT meetings. From UNHCR’s perspective, both the HCT and the UNCT require a time investment and are not necessarily conducive to helping advance overall objectives or ensuring that other actors beyond UNHCR take on their role and responsibility in their sectors.

OCHA contributes to IM in the inter-agency RRP framework and its role could be expanded. In Lebanon, the CRSF was referenced by OCHA and the HC but not mentioned by other actors.

The current context and coordination arrangements place all the pressure on UNHCR in a very difficult and increasingly untenable situation. In many ways, UNHCR is a victim of its own success in Lebanon. The largely unexpected decrease in available resources is prompting certain donors to favour an integrated response strategy that includes humanitarian response and development initiatives. UNHCR is under pressure to define what will be the focus of its assistance, how it will prioritise it and what will be excluded.

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217 OCHA had eight staff in country.
At the time of the field phase of the Evaluation, stakeholders within UNHCR felt that it was critical to preserve a humanitarian RRP. Most UN agencies, which also work in the development sphere, preferred an expanded RRP so as to have one main instrument, appeal process and streamlined systems and coordination processes. In the case of Lebanon where national plans have yet to materialise, UNHCR has to follow the structure and process foreseen at a regional level that is not always seen as the most adapted to suit Lebanon’s specific context. The perceived weakness of other plans and actors has led certain development donors to favour and earmark multi-annual development funding to UNHCR. A funding decrease would, in principle, call for UNHCR to focus on the more life-saving and basic humanitarian sectors, while in Lebanon the RRP process has tried to ensure that certain non-life-saving activities also be considered priorities (e.g. Education). Increasingly targeted assistance would require excluding many vulnerable Lebanese communities. The Government, however, will insist on assistance covering more Lebanese.

Recommendation 5: Clarify focus, priorities and consequences. The international community should continue to support UNHCR’s leadership in Lebanon. Beyond the RRP or revised appeal framework (3RP), the evaluation recommends that UNHCR clarify its own strategic priorities and its focus in worst-case funding scenarios, including the adverse effects and risks of this focus on the excluded population and sectors, and in terms of exacerbating tensions, potentially limiting or affecting future refugee access.

Recommendation 6: Continue to devolve responsibility. While difficult or uncertain, UNHCR should progressively reassign responsibility for certain sectors to other actors/UN agencies and monitor their take-up of these. A sector-by-sector, activity-by-activity specific strategy should be developed where UNHCR retains a clear inter-sector inter-agency coordination lead role. In the case of Lebanon, this recommendation does not apply to the health sector given UNHCR’s coordination capacity at the Beirut level, the importance of UNHCR’s health programme and WHO’s role and capacity in the country.

Recommendation 7: In contexts such as Lebanon, with refugee crises and Level 3 emergencies, in the aim of improving the effectiveness of the response, the respective roles of HCs, HCTs and UNCTs should be clear to avoid possible duplication. The 24 April 2014 Agreement between the ERC and the High Commissioner has not provided sufficient clarity on these roles when there is a refugee response coordination model in a protracted crisis, and an HC, HCT and UNCT are in place, or with regard to transition modalities when situations are volatile but clusters are not in place.

### 7.3.1 Does UNHCR promote partnership and help to promote synergies and avoid duplications, gaps and resource conflicts at the situational/regional, country and sector-specific levels? (10.1)

Overall, the evaluation found that in Lebanon UNHCR attempts to promote partnership to further synergies and avoid duplications, gaps and resource conflicts.

In Lebanon, coordination currently takes place at two levels:

- **National level:** primarily high-level liaison, strategic decision-making, technical guidance, advocacy activities and contribution to overall coordination and coherence of the response.

- **Field office/Governorate level:** primarily for coordination of detailed planning and implementation of activities, who is doing what where, monitoring and evaluation and community mobilisation.

A number of mechanisms/tools/systems (e.g. Activity Info, thematic maps, technical working groups) have been employed to aid coordination on both levels. Partner involvement in the choice and design of these tools and mechanisms is important, as is their commitment to a coordinated approach requiring sharing of information and contribution to the sector response as a whole. At the time of the evaluation there were a number of concerns with the rollout of Activity Info and its ability to replace other reporting efforts required and its usefulness at field level for M&E were questioned.
UNHCR should encourage integrated approaches and a comprehensive response by partners operating in specific geographical areas. Over time partners will develop an understanding of the area, build relations with local authorities, communities and beneficiaries and become better at quicker and easier responses when meeting on-going, changing or increasing needs of growing numbers of affected people in locations, and more locations in these areas. This will also simplify coordination between partners and allow new partners to focus on remaining gaps. In its call for proposals for partnerships in 2015 UNHCR tried to favour integrated approaches and to encourage partners to implement multi-sectoral responses in defined geographic areas, to promote synergies in the response, and cost-efficient processes by having partners implement a range of activities in one area. According to UNHCR however, many partners however still prefer to focus on using their expertise in a limited number of sectors.

7.3.2 Has the coordination of WASH activities with UNICEF and other key partners been well coordinated? Was there a clear and adequate division of labour? (11.1) 218

Both UNICEF and UNHCR WASH coordinators at the national level arrived only recently. For quite some time, there was a gap in coordination due to high staff turnover, with no continuity in the sector’s leadership. Coordination of the WASH sector is slowly improving, but the capacity of WASH partners is weak since both UNICEF and UNHCR are using the same INGOs as partners, and few WASH actors exist. Competition between INGOs for UN funding is affecting the implementation of WASH projects. There is a division of labour between UNHCR and UNICEF in this sphere, with UNICEF focusing on WASH activities in schools and ITS. In addition, UNICEF is not present in all regions, while UNHCR has regional WASH coordinators.

7.3.3 Has UNHCR coordinated well with UNICEF and UNFPA in programmes targeting child protection and SGBV? (7.5)

Respondents agree that UNHCR coordination has, in part, avoided duplication and major gaps. However, some private and institutional donors, such as the Gulf countries, intervened with specific actions and donations outside the RRP. This was the case with regards to some western donors that financed INGO projects without coordinating with UNHCR. This has resulted in some areas being over-covered as compared to others. If coordination is to work, donors should specifically require that implementing partners coordinate with UNHCR.

Respondents who commented on UNHCR and UNICEF roles in the response consistently pointed to a difficult working relation between the two at the field level. While an agreement on the separation of competencies seems to have been reached at the management level, and good cooperation has been established on, for example, SGBV interventions, the picture looks different from a field perspective. This was particularly true for partners that implement both UNHCR and UNICEF-funded projects and felt they were caught in what they perceived to be a fierce fight for leadership between the two agencies. Partners are often confused about roles and competencies. For example, it is considered ‘weird’ that an IP may have UNHCR funds for an education project and UNICEF funds for a protection project.

Views and perceptions of UNHCR’s role in promoting partnerships were mixed, both among partners and UNHCR staff. Several IP respondents believed that, more than coordinating, UNHCR tended to impose its views on child protection based on its specific mandate. Others thought that this was appropriate, but lamented that they were not as involved as they would wish in UNHCR’s advocacy work.

UNHCR respondents offered varying and sometimes conflicting views on coordination. Some staff perceived that, in its coordination role, UNHCR should be, and in fact is, neutral. That is, there should be no

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218 This responds to Evaluation question 10.1.2.
hierarchy between the implementation and coordination units, and the UNHCR participant in the Protection SWG should not be the same person as the UNHCR coordinator, etc. Others strongly affirmed that, by virtue of its mandate, UNHCR should be more assertive in exercising its leadership at a strategic and policy level. The Evaluation team believes that UNHCR cannot be expected to play the ‘neutral coordinator’ role when it comes to issues that concern the protection of refugees.

UNHCR appears strongly engaged in reaffirming its protection mandate in a critical environment. Tensions within the UN and keen attention to UNHCR’s coordination role have possibly contributed to its adopting a defensive position, whereby UNHCR appears increasingly inclined to control the response to the crisis, rather than lead it. This has sparked discontent, both internally and externally, and diverted efforts from important strategic work.

UNHCR should refocus its role on the definition of protection strategies while simultaneously being able to give clear directions on their implementation. This implies resisting donor pressure to compartmentalise refugee protection and define priorities in terms of specific issues or groups. It also implies the ability to carry out, directly or in cooperation with relevant partners, significant information gathering and analysis to inform effective programming.

7.3.4 Was there sufficient technical expertise to coordinate and implement sector activities? (10.4)

High turnover of staff members in certain sectors weakened coordination. Coordinators often had technical expertise but lacked experience in coordinating a sector. Coordination capacity was not always in place or was considered initially uneven. UNHCR increasingly managed to recruit longer-term staff with experience in coordination. Coordination across sectors, both at the national and regional level, has improved.

7.3.5 Has there been effective coordination of policy development and interventions among the agencies and organisations participating in the education sector? (13.3)

There has been more effective coordination of policy development in Lebanon than in Jordan, but the relationship and responsibilities between different UN bodies remains unclear. The assumption appears to exist on both ends that one organisation is not cooperating with the other or that one has an interest in ‘taking over’ responsibilities that are primarily in the hands of the other. Despite the existence of a letter of understanding between the agencies, there seems to be an awkward and frustrating ‘understanding’ particularly in the area of data sharing.

7.3.6 How effectively have different cash interventions by UNHCR and its partners been coordinated? Were they provided in an appropriate manner? (10.1.6; 15.2)

The four challenges identified by the Cash Working Group regarding coordination are: a unified mechanism to identify the vulnerable; guichet unique; the harmonisation of cash programmes; and one partner per location.

Disagreements arose in the Targeting Task Force at different times as a result of participants’ determination to develop the ‘gold standard’ of targeting methodologies.

‘Guichet unique’ implies ‘shaving’ the direct overhead costs, an undertaking that seems logical on paper but is difficult to implement in real life. There are currently four main operational mechanisms used to deliver

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219 This responds to Evaluation question 10.1.1.
220 One of the constraining factors are a result of UNHCR’s restrictive staffing policies that lead to short term deployments (initially for two months) followed by a renewal for an additional few months.
221 This responds to Evaluation questions 10.1.4 and 10.1.5.
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CTP. These are: UNHCR programmes using implementing partners to deliver monetised inputs to registered refugees; WFP programmes using implementing partners to deliver food assistance to registered refugees via conditional cash; NGO programmes delivering ad hoc cash inputs for registered refugees (including those who are registered but excluded from assistance); and NGO programmes delivering ad hoc cash inputs for unregistered refugees and host communities.

The harmonisation of cash programmes would entail turning the Cash Working Group into a think tank, which is demanded by all partners. An extremely useful analysis (see tables below) provided by a study commissioned by the Working Group identifies critical actions for programme design, targeting, and delivery mechanisms, implementation, monitoring, communication and data management.

7.3.7 What are the successes and on-going constraints associated with the Regional Response Plan (RRP) Process? (1.1.1)
The RRP process has helped establish a consensus around common objectives and has improved with every iteration. RRP6 was considered participatory.

If the primary purpose of RRP is to act as a fundraising instrument, the RRP should be better adapted to this objective and streamlined. The efforts put into the RRP are excessive, considering that it is essentially an appeal instrument and that a majority of donors are rarely guided by it considering that it is a compendium of projects. After so much effort, and time and human resources reportedly diverted from operational/field work, it is disappointing that certain actors do not consider the RRP a relevant operational tool (in Lebanon as well as Jordan). Donors, in particular, understand that there is a need for an appeal document but would prefer a lighter process and see an operational tool as a separate process and output.

Recommendation 8: The RRP should be a strategic and programmatic tool that offers a much clearer vision of what is to be achieved and how. The process should aim to be more straightforward and lighter at this stage of the response. The fact that activities are largely left to the initiative of the partners and defined a posteriori has the advantage of encouraging participation and ownership but proves problematic, because it hinders meaningful programming.

An RRP should better communicate on prioritisation and coverage of activities depending on funding scenarios and the associated consequences and risks of certain programmatic areas not being covered.

7.3.8 What changes, if any, to UNHCR’s coordination role/arrangements should be envisaged going forward? What lessons can be derived from UNHCR’s coordination role for other responses? (10.3)

- UNHCR should ensure coordination capacity and coordination skills of dedicated staff from the start of an operation to fulfil its coordination role. In Lebanon it initially struggled to have the right staff but has managed to put capacity in place. For UNHCR Human Resources, coordinators have been a new area of expertise that UNHCR has had to massively deploy.

- UNHCR should consider establishing coordinator rosters if it is to continue to pursue this lead coordination role in response to large-scale refugee crises. UNHCR should build on a culture of partnership and coordination that the agency has now had to forge as a consequence of its role in this response.

- The Evaluation recommends greater assessment and transparency regarding the current cost of the coordination model and to consider associated opportunity-costs of different options (including decentralisation) to promote cost-efficiencies and avoid unnecessary speculation and better understand the implications of different options within the model for this operation and in the future.

- Although Jordan has a different coordination arrangement with UNHCR programme staff, with expanded support staff taking care of coordination tasks, in Lebanon the consensus and demand for
dedicated coordination staff was significant. Dedicated coordination staff should have been put in place earlier both to boost capacity and avoid further debate.

- Inter-sector coordination is notoriously weak in most humanitarian responses. This has also been the case in Lebanon. In the future it would be of interest to find ways of encouraging integrated comprehensive approaches within a refugee response coordination model from the start. These would include geographic based approaches that are facilitated by greater field presence and decentralisation. As an agency, UNHCR has traditionally followed programme-based approaches, which are less "projectised" and “silied” into sectors. UNHCR had better use its comparative advantage as an agency with programme knowledge that understands its core mandate and objectives, the links between protection and other sectors, and when within a response strategic discussions across different sectors need to take place. Inter-sectorial partnerships should be promoted within UNHCR’s model to provide for holistically designed responses to ensure that the affected populations’ needs are met more comprehensively.

- As mentioned, UNHCR, following the model of partnership MoU with WFP at the agency level, can seek to enhance its partnership over time with an additional key UN agency. Opportunities could be explored with UNICEF for a selected sector (e.g. WASH or Education) to transfer some responsibility for certain sectors in the future. At the moment, UNHCR and UNICEF sign LoUs at the country level and UNICEF’s capacity is seen to be dependent on the existence of a project in that particular sector/activity. This transfer would not preclude UNHCR and UNICEF from exercising joint advocacy on key education issues at the government or Ministerial level, which is regarded as a case of good practice in Lebanon and would continue to be a core area of UNHCR’s competence across all sectors.

7.4 Durable Solutions

While durable solutions are somewhat premature given the response’s trajectory and the issues that relate to resettlement, the Evaluation did treat two questions relevant to longer-term strategies and planning.

7.4.1 Does UNHCR’s current strategy (RPP6) adequately address durable solutions in the context of Jordan and Lebanon? (9.1)

The search for durable solutions has been a central part of UNHCR’s mandate since its inception. Traditionally there are three durable solutions available for refugees: voluntary repatriation, local integration in the country of first asylum, or resettlement in a third country. Voluntary repatriation is regarded as the most desirable solution and was mentioned by certain Lebanese respondents as an option given Lebanon’s current situation. The notion of having Syrian refugees return to certain areas of Syria where rehabilitation could take place was emphasized. The situation in Syria, however, remains very unstable and is not conducive to return. Voluntary repatriation is therefore not an option in the foreseeable future. The Government of Lebanon maintains that Lebanon is not a country of asylum and does not consider local integration a possibility.

A German Temporary Humanitarian Assistance Programme offers temporary resettlement to a limited number of refugees. The conditions for planning and implementing resettlement programmes are difficult due to capacity/installation issues in Lebanon and resource-intensiveness. Absorption capacity of receiving countries is also extremely limited. Despite continuous efforts from up to the High Commissioner to expand the number of resettlement spots. Lebanon was only allocated 7,000 spots in 2014. UNHCR has merged the RST/RSD procedures to maximise the numbers of vulnerable Syrians to be resettled under the enhanced
use of resettlement operation. According to UNHCR this has resulted in a streamlined process able to meet the growing resettlement operation.\textsuperscript{222}

UNHCR’s approaches to durable solutions include targeted development assistance and the view that refugees need not be perceived as a burden but could, in the right circumstances, be agents of development and that refugees be given the opportunity to become self-reliant and access services. In the context of Lebanon, this would require far more development resources, massive international support and a comprehensive Public Information/communication campaign.

7.4.2 What links have been established that encourage the eventual absorption of humanitarian interventions into longer-term national programmes? (9.2)

UNHCR has tried to form a nexus between humanitarian aid and development by encouraging international commitment to help Lebanon cope with the massive flow of refugees and reward it for its solidarity and link assistance to refugees with efforts to address the needs and capacities of the host country and the communities and institutions that accommodate them.

UNHCR has had an important role in advocacy and coordination and tried to act as a catalyst and foster inter-agency partnerships. UNHCR has supported the World Bank contributing key resources and information and participating in its assessment and efforts designed to encourage and structure international community support and build resilience in Lebanon’s host communities. UNHCR’s strategy has relied on efforts and a strong partnership with the World Bank to provide development support that can complement immediate humanitarian actions. Thus far, there have been insufficient concrete results from these efforts or the partnership.

Constraints on establishing this desired nexus between the humanitarian and development spheres include the fact that the concept of longer-term national programmes is virtually non-existent in Lebanon. The country operates on a day-to-day basis and there is no designated entity to deal with the different facets of the Syrian crisis apart from the Ministry of Social Affairs (MoSA). The GoL also has no unified position vis-à-vis the crisis. Despite a long-standing tradition of Syrians working in Lebanon (estimated at around 250,000-400,000 before the crisis, all of whom were employed in the unskilled labour market), the massive refugee influx has increased supply, while demand remains stagnant or may even be shrinking. Thus, a better “encadrement” of livelihoods is needed but has not yet taken place.

UNHCR has encouraged the Government of Lebanon to further define its vision for stabilization initiatives and come up with concrete projects that donors could fund, like the Government in Jordan has.

7.5 Sector Analysis

The following sections treat food, cash, shelter, water and sanitation, health, education and livelihoods. These are generally organized according to OECD DAC Evaluation levels although the analysis, at times, cuts-across these levels. This enables a more coherent and appropriate approach for each of these.

Effectiveness, coverage, appropriateness, connectedness, efficiency, and impact are addressed in the following section.

7.5.1 Shelter\textsuperscript{223}

Lebanese authorities have so far not permitted the establishment of refugee camps. Syrian refugees are scattered across the whole country, with the majority living in rented accommodation. The increased

\textsuperscript{222} According to UNHCR, RSD targets were met at the end of October 2014.

\textsuperscript{223} This responds to evaluation questions 10.1, 10.2 & 10.5.
Beyond Humanitarian Assistance?
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Draft Report

demand and limited supply of housing is causing rental prices to soar and poor Lebanese and Syrian
refugees are increasingly unable to cope with the rising costs.

Housing remains the most pressing issue for refugees. As the Syrian crisis drags on, the rental market in
some municipalities is becoming saturated and finding shelter has become an increasing challenge. Rents
have risen fourfold in some areas and Syrians with no income are increasingly indebted or risk eviction.
Refugees are on average paying 200 USD a month as rent for a substandard room to host an entire
family. Cash assistance for rent has been granted to families over limited periods and may have
contributed to the rise in rents. Rehabilitation of Lebanese-owned dwellings in exchange for a period
(usually one year) of free rent has also placed an expiration date on families’ ability to benefit from free
rent. Trends suggest that further consideration of longer-term strategies that address shelter needs for a
protracted period and help curb rising rents through additional private sector engagement (e.g. as in the
case of the health sector) may have been necessary.

Refugees are found in many different types of accommodation of varying quality. These include rented
rooms, abandoned and refurbished buildings, collective centres and informal settlements. These
settlements are scattered across the country and are usually established on private land.

Rising numbers of refugees now resort to occupying empty buildings that are severely sub-standard as well
as joining rapidly growing informal tented settlements where water and sanitation facilities are particularly
lacking, or are otherwise sub-standard. Moreover, since this informal housing is often established without
authorisation on public or private land, evictions are said to occur frequently. The growth of informal
settlements, currently home to over 193,000 refugees, presents risks to refugees and increases tensi-
ons with surrounding communities.

There is often little possibility to establish dedicated areas for women, play areas for boys and girls, or
access to adequate WASH facilities for the elderly and persons with disabilities.

There are also issues associated with shelter that may contribute to conflict. Syrians in Arsal are mainly the
families of the FSA and Nusra Front, and Syrian opposition fighters themselves. UNHCR has attempted to
relocate them further from the border, however, many have expressed reluctance to do so and there is a
problem finding communities willing to accept them. UNHCR has been following the situation closely,
including frequent visits of the Zahle HoO, and they have plenty of partners in the area. However, any
action is constrained by due caution.

Recommendation 9: UNHCR is encouraged to continue its advocacy with the GOL to endorse the
emergency shelter strategies developed.

These should include relocation sites for refugees affected by adverse weather or armed conflict. This plan
would require GoL permission and coordination.

The shelter sector predicts that current interventions to rehabilitate houses and provide collective shelters
will be insufficient to respond to increasing refugee numbers. So too does it anticipate that new arrivals will
continue to resort to spontaneous and often sub-standard shelter options, mainly informal settlements.

224 In “Behind the Concrete Veil Humanitarian needs of vulnerable crisis-affected refugee and host families in urban and peri-urban
areas of Beirut and Mount Lebanon” April 2014: Over 34% of households assessed by ACTED in Lebanon required upgrading or
rehabilitation, and 48% were found to have inadequate or lacking WASH facilities. Furthermore, 36% of assessed households were
found to be living in less than 3.5m² of shelter space per person, and the average number of individuals per shelter was 7.4. Even in
these conditions, a large number of households remain at constant risk of eviction in case of rent payment delays or failures.
225 UNHCR Lebanon Shelter Update August 2014.
The shelter strategy seeks to increase the shelter options available for refugees, including through rehabilitation of small shelter units that can be made available for reduced rent or for free within a predetermined period. Substantial time is spent on negotiations with local authorities, landlords and landowners regarding the rehabilitation and/or upgrading of houses. However, advocacy with the GoL for alternative shelter solutions is needed to solve the looming shelter crisis.

While this is necessary, it is not clearly aligned with sufficient targeting, especially amongst the most vulnerable, to ensure that shelter is provided equitably and to those most in need. Assessments have found a clear correlation between access to income and poor living conditions, which would warrant increased targeting based on economic vulnerability. Overall, by the end of September 2014, agencies reported shelter assistance to have reached 332,472 individuals during the nine months of the year (roughly 50% of the number targeted for 2014). This included 242,221 Syrians, 56,139 Palestinian refugees from Syria, 2,213 Lebanese returnees, and 31,899 affected Lebanese.

Shelter agencies have been operational in terms of site improvements of informal settlements. Site improvements include decongestion, levelling, laying gravel, drainage ditches, sand bags for flood mitigation, and other similar improvements. Weather proofing of shelter units within informal settlements has also been carried out by the shelter sector. While these activities are important and effective, the scale of the need for surpasses these activities and current efforts are below targets. Shelter interventions have had to be postponed due to insecurity and lack of official approval to proceed.

Graph 37: Source: Interagency Lebanon Shelter RRP6 Dashboard September 2014.

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226 ACTED, Behind the Concrete Veil Humanitarian needs of vulnerable crisis-affected refugee and host families in urban and peri-urban areas of Beirut and Mount Lebanon” April 2014.
227 Interagency Lebanon Shelter RRP6 Dashboard September 2014.
7.5.2 Water & Sanitation

Access to water facilities is poor, the most vulnerable being located in collective centres and Informal Tented Settlements (ITS). One of the consequences of the influx of refugees that Lebanese complain about is increased waste in streets, hillsides and dried riverbeds where more and more Syrians live. According to the WASH sector strategy (February 2014), one-third of the refugee population need support on water, sanitation and hygiene promotion. The VASyR assessment findings indicate that 30% of households reported not having access to sufficient water for domestic purpose, 40% of households do not have access to adequate latrines and 15% of households lack access to hygiene items.

Taking into account that water quantity, quality and access were challenges that pre-dated the Syrian crisis, the UNHCR WASH sector has been effective in ensuring that most Syrian refugees have access to safe water either through water trucking in rural areas or through access to public water networks. However, the quality and quantity of safe drinking water is not sufficient and refugees have to supplement this by buying bottled water in order to meet their drinking needs.

Unlike refugees living in rented accommodation, those living in informal (tented) settlements only have access to very rudimentary water and sanitation services. Moreover, there is no clear understanding among WASH actors as to the gaps and real needs among these beneficiaries. Even though improving WASH infrastructure in these settlements is not always easy, given the complications entailed in obtaining the agreement of private owners and/or the government, a gap and needs analysis of WASH related issues is needed to define a clear strategy of WASH interventions in the different shelters and regions.

Thus, objectives were not reached in informal settlements, sub-standard buildings and other informal structures. Here overcrowding, lack of access to cleaning products, and lack of clean facilities are causing refugees to suffer from poor hygiene-related illnesses. Mass information campaigns should be further improved in collaboration with operational partners to ensure refugee awareness of their entitlements and obligations, where and how to access services and assistance, and other information needs as identified through consultation with the refugees themselves.

Syrian refugees generally are knowledgeable of, and practice, good hygiene when they have access to water and hygiene products. In this regard, objectives were achieved. In addition, effective community mobilisation to address harmful practices, as well as the delivery of hygiene products and services, has reduced the risk of WASH-related diseases.

As water scarcity becomes an issue in the summer of 2014 onwards due to lower than average precipitation in the winter of 2013, WASH actors have been working to reduce the impact of water scarcity through various water projects. These include conducting regular awareness campaigns with both Lebanese communities and Syrian refugees to encourage them to practice water conservation. The WASH sector is also advocating for the development of sustainable water payment systems that would help preserve water in the long run.

**Recommendation 10:** Conduct a more comprehensive and detailed assessment of WASH needs in informal settlements. Use results to develop overall strategy for the informal settlements.\(^{228}\)

In terms of the WASH, shelter and NFI sectors, the assistance needs of the most vulnerable are largely not met, as there are no clear guidelines among UNHCR’s partners regarding vulnerability criteria. Different sectors use different criteria while some NGOs use completely separate criteria. For example, the priority of the Shelter Working Group is the availability of space and the identification of empty buildings, rather than

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\(^{228}\) According to UNHCR, in order to avoid duplication of assessments, instead of launching a WASH assessment, the WASH actors have utilized existing surveys, such as the shelter survey and the informal settlement survey to inform their strategy.
identifying vulnerability and then rehabilitating buildings for vulnerable refugees. The identification of accommodations is far different from determining who is in most need of accommodation.

UNHCR might consider handing over coordination of the WASH sector to UNICEF, as it is the global lead in this sector. As the WASH sector lacks capacity in terms of partners and coverage, UNHCR needs to diversify and work with the private sector and local NGOs, as well as to look into the possibility of contracting. WASH assistance should include both refugees and host communities. Moreover, it is imperative that UNHCR starts coordinating and cooperating more with local municipalities at the regional level.  

7.5.3 Food  
Food assistance has undoubtedly met life-saving needs. The Vulnerability Assessment of Syrian Refugees in Lebanon (VASyR – 2013) notes that 72% of the individuals (and 68% of the households) were sufficiently vulnerable to warrant continued food and non-food assistance. Of these 72%, some 24% confirmed that food vouchers were their only livelihood source. By May 2014, WFP was reaching 697,000 persons, as compared to the 2,200 reached by other partners in May 2014. Food assistance was increased from $27 to $31 per person during winter months to boost caloric intake.

According to the Vulnerability Assessment of Syrian Refugees in Lebanon (VASyR 2013), jointly carried out by WFP, UNHCR and UNICEF, 72% of individuals (and 68% of the refugee households) were sufficiently vulnerable to warrant continued food and non-food assistance. By May 2014, WFP was reaching 697,000 persons, as compared with the 2,200 reached by other partners. In July 2013, WFP adopted a two-stage cluster random sampling approach, using UNHCR’s ProGRES cluster classification. 80 households were visited every month in each sub-office, ensuring a level of confidence of 80% on a monthly basis at the regional level, which was brought up to 90% at the national level across one quarter. Additionally, in January 2014, WFP resumed data collection of its pre-assistance baseline monitoring (PAB). The methodology for data collection is identical to the post-distribution monitoring (PDM) methodology used for comparison purposes. The aim is to compare households that have not yet received the WFP e-card to those that are currently benefiting from the programme so as to gauge the impact of the food assistance programme on the refugee population in Lebanon.

The results of Post-Distribution Monitoring (PDM) show deterioration in coping mechanisms when compared to one year earlier.

7.5.4 Cash  
UNHCR reports and other evidence support that UNHCR has been struggling to achieve its objectives in relation to cash assistance, especially when compared to the increase in the refugee inflow and the limited  

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229 This responds to evaluation questions 11.2 and 9.1.
230 This section responds to evaluation questions 8.1, 8.2, and 8.3.
financial resources available. Under the current resource constraints, it is estimated that UNHCR will be able to cater to the needs of extremely vulnerable households only.

The Lebanon conditional and unconditional cash transfers experience was marked by the move to e-vouchers and ATM cards, which is a pioneer experience by its magnitude not only in the region but also at a worldwide scale. This has been largely dictated by the fact that Syrian Refugees in Lebanon are scattered in over 1,700 locations as well as the absence of camps, which makes in-kind and/or paper voucher distribution on recurrent basis cumbersome and costly, not to mention verification costs and post-distribution monitoring. The switch from in-kind assistance to cash assistance has been greeted as a positive move by refugees. This is supported by their capacities to maneuver in different markets and fair financial literacy.

It becomes clear that with a stagnating budget in 2013 and 2014 and grim prospects for 2015, coupled with growing numbers of registered refugees, painful decisions have to be made. The challenge is to determine who are the most vulnerable and how they can be reached. On one hand, the Vulnerability Assessment of Syrian Refugees in Lebanon (VASYR)²³¹ concludes that 72% of individuals (equalling to 68% of the households) continue to be sufficiently vulnerable to warrant continued food and non-food assistance, while the Cash Working Group (CWG) report builds the analysis on the assumption that 16% of households face severe vulnerability (35,000 households) and another 32% moderate vulnerability (70,000 households) in addition to some 13,000 unregistered refugee households that are mildly to severely vulnerable.²³² Beyond that, however, exclusion error becomes more likely and mitigation measures must be set in place (e.g. gradual roll-out, appeal, verification, etc.).²³³

The lessons learned from the use of cash transfers through ATM cards in the winterization program, which were by-and-large confirmed by the various stakeholders during the interviews, suggest that “... the transition to e-transfers exposed and magnified existing weaknesses in assistance/distribution systems...” but “... this was the first large-scale e-transfer of its kind, so certain aspects could not be fully anticipated...”²³⁴ The report makes a strong case for conducting comprehensive assessments of both markets and contexts to identify the risks and impacts of cash assistance and highlights the importance of the “learn as you go” approach in developing a flexible and adaptive management. It also recommends to invest in data management/sharing and to streamline procedures for card management.

Targeting is a critical element in how cash and financial assistance is handled in Lebanon. This is the case in terms of winterisation, shelter, back to school schemes, NFIs (UNHCR) or food assistance (WFP). The current trend is to move towards unrestricted cash by pooling available resources. The Targeting Task Force has established that proper targeting would have a high incidence in reducing negative coping mechanisms (such as begging, child labour and early marriages, etc.) and reduce living expenses.

The current trend—at least from the UNHCR side—is to move towards unrestricted cash by pooling available resources. On-going pieces of work in the CWG that directly affect the optimization (and subsequently the effectiveness) of the operational set-up for unconditional cash to registered Syrian

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²³¹ Vulnerability Assessment of Syrian Refugees in Lebanon – VASYR (WFP, UNICEF and UNHCR 2013)
²³² Research to Identify the Optimal Operational Set-up for Multi-Actor Provision of Unconditional Cash Grants to Syrian Refugees in Lebanon (Avenir Analystics, April 2014)
²³³ The final conclusion of the CTWG is that 29% of the population is severely economically vulnerable, in that they cannot meet the minimum expenditure basket.
²³⁴ DRC Lebanon Unconditional Cash Assistance via E-Transfer: Implementation Lessons Learned Winterization Support via CSC Bank ATM Card (DRC, February 2014)
refugees are targeting, monitoring, and communications. All three aspects would significantly enhance effectiveness if properly addressed.

It is clear that with stagnating budgets in 2013 and 2014 and grim prospects for 2015, coupled with growing numbers of registered refugees, UNHCR and its partners face difficult decisions. The challenge is to determine who are the most vulnerable and how they can be reached. Agreement exists as to the bottom 8% (high burden/high vulnerability). Beyond that, however, exclusion error becomes more likely and mitigation measures must be put in place, e.g. gradual rollout, appeal, verification, etc.

The switch from in-kind assistance to cash assistance has been greeted as a positive move by refugees. This is supported by their capacities to maneuver in different markets and fair financial literacy. WFP and partners managed to reach close to 70% of the caseload for food assistance, with the e-card being the preferred mode in 90% of the cases, and paper vouchers and/or in kind rolled-out for cases where distribution through e-cards was not possible. In the light of the ever-expanding magnitude of the crisis, it is difficult to assess what could have been done better or differently. The program has been injecting on monthly basis in 2014 25-28 million dollars in the Lebanese economy, through a network of 270+ stores, mostly small businesses.

Completed in May 2014, the study commissioned by Cash Working Group (CWG), “Research to Identify the Optimal Operational Set-up for Multi-Actor Provision of Unconditional Cash Grants to Syrian Refugees in Lebanon,” advocates for transfers of $250 a month to severely vulnerable populations and $150 to moderately affected households. Additionally, the task team within the CWG is advocating for $120 for unregistered households as cash support for food expenses. Newcomers are currently not being supported with cash transfers. In the study, the most plausible scenarios for June 2014 and beyond are set out and summarised below.

It must be noted that all scenarios have an embedded monthly deficit, which will most likely be met by negative coping mechanisms and risks to be further aggravated should other forms of assistance (such as NFIs, for example) is discontinued without appropriate replacement mechanisms.

<table>
<thead>
<tr>
<th>Category</th>
<th>Households</th>
<th>MEB Monthly ($)</th>
<th>MEB Monthly Planned Coverage ($)</th>
<th>Monthly Deficit ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registered</td>
<td>220,000</td>
<td>600</td>
<td>0 0 32 32</td>
<td>600</td>
</tr>
<tr>
<td>Low</td>
<td>82,000</td>
<td>600</td>
<td>0 0 0 0</td>
<td>0</td>
</tr>
<tr>
<td>Mild</td>
<td>35,000</td>
<td>600</td>
<td>90 150 32 0</td>
<td>272 328</td>
</tr>
<tr>
<td>Moderate</td>
<td>70,000</td>
<td>600</td>
<td>90 150 32 32</td>
<td>422 178</td>
</tr>
<tr>
<td>Severe</td>
<td>35,000</td>
<td>600</td>
<td>90 150 32 250</td>
<td>522 78</td>
</tr>
<tr>
<td>Unregistered</td>
<td>22,000</td>
<td>600</td>
<td>0 0 0 0</td>
<td>600</td>
</tr>
<tr>
<td>Low</td>
<td>7,700</td>
<td>600</td>
<td>0 0 120 32 0</td>
<td>120 480</td>
</tr>
<tr>
<td>Mild to Severe</td>
<td>14,300</td>
<td>600</td>
<td>0 0 120 32 215</td>
<td>320 280</td>
</tr>
<tr>
<td>Newcomers (month)</td>
<td>10,000</td>
<td>600</td>
<td>0 0 105 215</td>
<td>320 280</td>
</tr>
<tr>
<td>All Categories</td>
<td>10,000</td>
<td>600</td>
<td>0 0 105 215</td>
<td>320 280</td>
</tr>
</tbody>
</table>

Graph 39

It must be noted that all scenarios have an embedded monthly deficit, which will most likely be met by negative coping mechanisms and risks to be further aggravated should other forms of assistance (such as NFIs, for example) is discontinued without appropriate replacement mechanisms.

235 IBID.
The limited resources available for the cash programme, and most notably the unconditional cash support should be channelled in a way that improves effectiveness and efficiency. The Cash Working group identifies four key areas to be addressed: a unified mechanism to identify the vulnerable; *guichet unique*; the harmonisation of cash programmes; and one partner per location.236

‘*Guichet unique*’ implies ‘shaving’ the many overheads, an undertaking which seems extremely logical on paper but is very difficult to implement in real life. There are currently four main operational mechanisms used to deliver CTP. These are: UNHCR programmes using implementing partners to deliver monetised inputs to registered refugees; WFP programmes using implementing partners to deliver food assistance to registered refugees via conditional cash; NGO programmes delivering *ad hoc* cash inputs for registered refugees (including those who are registered but excluded from assistance); and NGO programmes delivering *ad hoc* cash inputs for unregistered refugees and host communities.

**Recommendation 11:** Improve UNHCR’s cash programme through four inter-connected measures: i) a unified mechanism to identify the vulnerable; ii) *guichet unique*; iii) the harmonisation of cash programmes; and iv) one partner per location. (Section 7.5.4.)

### 7.5.5 Core Relief Items (NFIs)

The overall impression gained from the available evidence is that the basic needs of vulnerable refugee populations are largely being met in the NFI sector. At the same time, the NFI sector faces budget constraints that could impede progress.237 It was reported that the European Commission’s Humanitarian Aid Directorate (ECHO) would reduce the budget for newcomer needs by 50%.

The NFI response requires more accurate and timely data on which to base decisions. In addition, INGOs have limited technical capacities to analyse data, which has hindered effective identification and targeting of needs and response. It has also been difficult for sector members to access and identify newcomers, which adds to logistic costs and means that some refugees are missed and do not receive the NFI package that all new arrivals should be provided with.

The data and information reviewed shows that there should be geographical variation in the delivery of NFIs and cash assistance. Greater attention should be given to variations in the cost of living and access to markets across Lebanon. Cash assistance could be weighted for regional variations in living costs and the price of goods and services.

Enhanced monitoring and evaluation of NFI, basic needs, and cash assistance programmes is required. This includes the standardisation of national post-distribution monitoring, a national price and market assessment, and assessments on access and barriers to distribution points for refugee communities.

**Has the winterisation package been adequate, delivered in a timely fashion, and on a sufficiently substantial scale to adequately face winter conditions? (1.2.3; 9.2)**

During the winterisation programme, the sector covered most refugees living in areas above 500 metres in elevation and those living in informal settlements, unfinished buildings, and in the worst off shelters.

INGOs have conducted a survey to assess the appropriateness of the NFI kit. Results showed that the kits were appropriate with kitchen sets considered the most useful and hygiene kits given the lowest preference.

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236 Presentation by the Cash Working group (May 19th, 2014) during a joint working meeting with the Livelihoods and Social Cohesion working group.

237 It was reported that the European Commission’s Humanitarian Aid Directorate (ECHO) would reduce the budget for newcomer needs by 50%.
The winterisation programme started too late, and a number of refugees received their winterisation package after the winter. The lack of timeliness of the winterization response has repeatedly been an issue. This winter was considered milder than others. The package itself was considered adequate. The winterisation programme intended to target most vulnerable households and wrongfully excluded certain families. After an appeal process, many of those excluded were again accepted into the assistance programme.\(^{238}\)

The winterisation cash programme did not adequately anticipate the requirements, constraints and potential risks associated with beneficiary registration and data protection. Prior to this large-scale program, cash project caseloads averaged between 800 and 2,000 households and were of manageable size for agencies to ensure proper implementation. Agencies could follow-up directly with each beneficiary to ensure the intended family received the card (and subsequently the cash). The project transformed the target population into cash recipients overnight. Most importantly, there was no agreement on feasible minimum standards of verification required prior to the cash programme rollout.

UNHCR’s cash programmes include cash for rent and winterization (5 months in 2013-2014) in addition to one-time off emergency cash assistance for extremely vulnerable families and/or protection cases. The winterization experience was done through moving (rather in a hurry) from paper vouchers to e-vouchers and carried out by DRC on behalf of UNHCR until March/April 2014. Plans are underway to move to cash in the NFI sector as well starting July 2014, provided that funding can still be secured. Of course, one would argue here that cash transfers could have been done better or differently, but a comprehensive compendium of the lessons learned from the winterization experience\(^{239}\) reveals that many aspects were difficult to anticipate due to the novelty and the magnitude of the task at hand. Generally speaking, the UNHCR cash transfer program remains largely underfunded and projections are that it would be able to serve at best the 8% caseload identified as severely vulnerable, with rather limited options (and resources) for the remaining households.

7.5.6 **Health: The Limits of Humanitarian Assistance Tested**\(^{240}\)

The healthcare system in Lebanon is fragmented and pluralistic. It suffers from deregulation, uncontrolled expansion, and includes a variety of private and public organizations that finance and deliver healthcare. Government policies are often contradictory, priorities are not set, the vision is not clear and the strategy is not fully articulated.

The system is based on specialized services through a network of providers. The system is financed by seven public funds (two employment-based social health insurance schemes, four security forces schemes and the MOPH), 71 mutual funds, 56 private medical insurance companies, and numerous NGOs and Out-Of-Pocket expenditure. Each fund has a different authority and a different package of benefits.\(^{241}\) State-owned beds represent only a small fraction of the bed capacity (90% of beds are private owned)\(^{242}\) and the government only partially subsidises the costs of secondary healthcare for vulnerable Lebanese (only 50%
of Lebanese have some sort of health insurance).\textsuperscript{243} Primary healthcare in Lebanon is implemented by religious/confessional organisations, a network of local NGOs and private/not-for-profit organisations.

Syrian refugees, representing over a quarter of the overall population in Lebanon, have become a significant source of demand for services, a financially attractive caseload backed by a funder (UNHCR) that provides coverage of the fees for services provided (refugees are charged fees for services and 75% are covered by UNHCR). In some cases a de facto division of service providers between refugees and the ones providing healthcare to Lebanese has taken place, and providers have, in some cases, been able to adapt the offer to the demand.\textsuperscript{244}

The initial aim in the health sector was to ensure an adequate access to health services for all refugees. Early in the response, this was addressed by providing health services at entry points and ensuring that some NGOs could channel incoming cases requiring primary and secondary healthcare through local service providers, public or private, for profit or charities, in a modus operandi similar to the one established for Iraqi refugees. Initially, a GoL mechanism, the High Relief Commission, active during the influx of Iraqi refugees, granted access to specialized care for Syrian refugees but its activity subsided towards the end of 2012 when the dimension of the influx made the Commission a less feasible option. Some indicate that a lack of funding and the emergence of UNHCR and other international actors made this government strategy less of a focus. This mechanism seems to not be functional at present but no clear reason other than lack of funding was provided for its cessation. Lack of funding may be a product of the inter-ministerial body being in the PM office and the delicate political situation in the country.

When the influx reached over 300,000 refugees in mid-2013, the situation became unmanageable for UNHCR and NGOs given the high complexity of administrative procedures linked to service provision and its billing/procurement procedures. The resulting workload, and the difficulties to adequately ensure coherence between the care provided and the services invoiced, required the contracting of a for-profit organization that manages insurance schemes, Globe-Med. Now, this company acts as a third-party administrator of healthcare service provision issues.

The arrangements and contract terms with Globe-Med do not include appraisals and tracking of demand. It also adds a third party in the process, thus thwarting attempts to be more patient-centric.\textsuperscript{245} From the information available, dashboards from 2013 and 2014 and RRP5 and RRP6 documents, the emphasis on the numbers of refugees becomes the most relevant aspect. This tends towards a commercial assessment, simply being aware of the numbers of patients rather than their needs and how these needs change as the crisis continues. UNHCR does not maintain a comprehensive health strategy or plan and has instead outsourced most of its programme to Globe-Med as a third-party commercial service provider.

Syrian refugees are bringing with them a pattern of disease and potential aggravation of health status that has been poorly defined in the response. Mortality rates for children under five years were 15 per 1000 live births before the conflict, and life expectancy at birth was 62 years for males and 72 for females.\textsuperscript{246}

\textsuperscript{243} Statistics confirm that 50% of Lebanese do not have any form of health coverage. Meanwhile, all those enrolled with the National Social Security Fund (NSSF) lose their benefits upon retirement or loss of job. Source: http://english.al-akhbar.com/node/18553.

\textsuperscript{244} The Evaluation team was able to verify this in Bekaa, where some clinics of primary health care visited had already differentiated offer to Syrians (specific time schedule and services), and adapting capacity in some hospitals (increasing number of beds of maternity hospitals dealing with Syrian refugees).

\textsuperscript{245} The response being reactive rather than proactive and strategic is a general opinion of those met during the Evaluation, from all sort of stakeholders. More is analysed from the RRP documents and matrices associated under heading 1.1, effectiveness, progress towards objectives.

\textsuperscript{246} http://apps.who.int/gho/data/node.country.country-SYR.
Immunization coverage was considered adequate and the main health needs for the population typical of a middle income country going through (or already over) the epidemiological transition (with a crude mortality rate of 6.2 per 1000 and a crude birth rate of 24.4 per 1000), with the specific dimension of raising non-communicable diseases (NCD) and chronic diseases. Tobacco consumption is widespread, obesity affects 27% of the population and hypertension 25%. The probability of dying between ages 30 and 70 years from the 4 main NCD (cardiovascular diseases, cancer, diabetes and chronic respiratory diseases) is 19%.

Health challenges related to management of health service provision to a population of 1 million through a network of private service providers requires specific managerial, business, and negotiation skills, especially within UNHCR. Most respondents state that UNHCR health sector resources for implementation (human and technical) are perhaps short of what is needed while coordination requires further attention. High turnover and an emphasis on direct implementation have limited UNHCR’s development of much needed capacities. In UNHCR, there is a need to improve coherence between the central and field office level in terms of strategies, criteria, etc. This was repeatedly highlighted as a weakness of the decentralisation process by international and local NGOs.

According to statements by UNHCR health sector staff, this issue is being addressed through closer follow-up and increased participation of health section staff in field office cluster meetings. The decision to address challenges of sector coordination with dedicated staff and resources has facilitated the profiling of sector coordination and improved involvement of main actors, such as WHO. However, there has yet to be a coordinated strategy for the sector, and terms of reference for different coordination mechanisms.

Restrictive interpretation of standard operating procedures has been reported as a real problem in some cases making it difficult for vulnerable refugees to claim/contest the decisions, as well as NGOs on their behalf and limiting access to some treatments. The management of standard operating procedures is seen as a way to limit expenses rather than as a way of providing clarity or benefitting refugees in need. The current system considers UNHCR the client, not the refugee.

Aspects of client satisfaction and negotiated rates should be more closely monitored by UNHCR. There should be established targets and mechanisms for the Third Party Administrator. The Third Party Administrator had been operational for only a few months during the Evaluation period, and significant progress was evident in terms of processes of authorization and billing of care procedures, and dealing with claims. Patients’ satisfaction records however, were still limited to administrative problems with service providers or to the interpretation of standard operating procedures, while the establishment of a clear-cut basket of services for refugees through a network of certified providers at preferential rates was still to be addressed.

Health Needs of refugees should be better analysed and described in future RRPs so as to ensure adequate targeting and coverage. In order to improve the response and ensure better coverage of needs in the upcoming RRPs the following should be taken into account:

- Address socio-economic determinants of health and specific needs for this population (better analysis of profile and description of health needs for this group);
- Improve vulnerability criteria for the sector and coverage;
- Address primary healthcare shortfalls;
- Better articulate of the supply/offer in relation to the demand;

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• Review financial mechanisms covering the costs of healthcare of refugees;
• Refugee participation should be ensured, enhanced and made explicit so as to better address accountability concerns;
• Better typified and systematise needs of refugees in difficult to reach areas; and
• Undertake a research consultancy to establish viable alternatives to funding health schemes (such as sick funds based on contributions to a refugee trust fund or mutual sick fund, with innovative means of implementation including negotiation with short listed providers, the possibility of introducing health vouchers for frequent conditions or specific health prevention programmes).

Objectives
Overall, evidence available and general agreement amongst respondents suggests that deterioration of refugees’ health status of refugees has been prevented. 248 Evaluating the effectiveness of the intervention in the Health Sector, however, is problematic given the way in which objectives have been defined, the absence of formulated outcomes, and the setting of confused targets.

The only objective for the health sector in Lebanon within the RRP5 was expressed as: Health of the population improved. The associated matrix is organized as a long list of activities (in some cases actually outputs), targets and partners. Targets are broken down by partner, activity and location, but the reports available do not follow the programmatic document structure, making it difficult to ascertain actual progress and results. Only a global perspective is provided in the reporting documents and dashboards.

Access
Access to essential health services is limited by financial costs, transport difficulties and weak (or informal) primary healthcare system 249. Host communities share these limitations, but enjoy a more structured and adapted network of primary healthcare, linked to confessional or political affiliation, quite flexible in terms of providing services, of uneven quality.

In Lebanon, the primary healthcare approach has only recently been addressed by UNHCR and is still limited in scope, reflecting the hospital-based approach of the Lebanese and Syrian health systems and clients’ preferences.

Primary healthcare attendance figures (as per MYU and dashboards) still fall short of standards. The fact that many local and institutional partners are not likely to report attendance figures can partially explain this low frequentation, but aspects of geographical and financial access may also be a factor. Opinions captured during the Evaluation, however, (local partners, INGOs and UN staff), generally state that there is no shortage of primary healthcare services but that these need to be harmonized and integrated in Health Management Information Systems (HMIS). Only UNHCR partners seem to provide reliable data on primary healthcare attendance and health programmes. The underground and informal network of Syrian health professionals providing support to refugees is not accounted for.

Although national policy favours ANC as a free access program Access to health programmes (ANC, NCD, PNC) is limited by the availability of primary healthcare and the cost involved. Pilots attempting to increase ANC attendance through health vouchers should be monitored and followed-up on. Though feasible and desirable, the current system does not link primary healthcare programmes with access to secondary healthcare.

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248 Data is at its best incomplete, as only a fraction of health care providers report to MoH. The way things work in Lebanon, however, allow to infer that serious public health consequences have been prevented and most of refugees have reasonably acceded health care when needed.

249 HH survey, Informants, field visits.
The presence of refugees has stretched fragile health service mechanisms to the limits. Possible tensions stem from the fact that refugees have access to secondary healthcare with support from UNHCR, that can be complemented to 100% in case of proven vulnerability, something that Lebanese have more difficulty receiving or no access to. Primary healthcare centres that deal with high number of refugees become somehow less accessible for Lebanese who are obliged to pay a small fee for access, while UNHCR partners cover the costs for refugees. In some cases, primary healthcare centre directors have organized different schedules for refugees and Lebanese nationals.

The influx of refugees competes with resources available for the Lebanese populations, especially the subsidized services for vulnerable Lebanese. One of the first side effects has been a shortage of drugs for NCD. In some cases, refugees have easier access to secondary healthcare through UNHCR coverage of fees than Lebanese in need, raising tensions within communities. RRP5 only indirectly advocates addressing Lebanese affected by the influx of refugees, as it intends to reinforce immunization capacity in some regions.

RRP6 advocates reinforcing health systems so as to also address outstanding needs of Lebanese. The matrix associated with the objectives in RRP6 document distinguishes between what is needed to support the services of MOSA and what is required for UNHCR partners/UNRWA/UNICEF and WHO. The reporting, however, does not clarify the mechanisms of distribution of funds and the actual effectiveness in facilitating healthcare for vulnerable Lebanese. MOSA informants, however, expressed satisfaction on UNHCR support for their services, accessible both to refugees and Lebanese alike.

UNHCR has advocated to development donors and technical agencies reinforcing aspects of the health system, such as improving the Health Information System (HIS), data related to service provision, outcomes, epidemiological and managerial data. In the EU’s stability fund some provisions are foreseen on the HIS that include ensuring a basic health package for Maternal and Child Health and availability of drugs for non-communicable diseases (NCD). This would have an impact on Lebanese and refugees alike. The stability fund of the EU (€20 million) means to address some of these issues.

An initial description of the factors affecting the eventual demand for services include:

- **Demographic profile of refugees:** a better knowledge of demographic factors and existence of health demands in registration would help to tailor a response to needs. For instance: 78% of registered refugees in Lebanon are women or children. This would emphasize the need to reinforce Reproductive Health services, and address Maternal and Child Health and child related programmes, including nutrition monitoring, vitamin supplements, and case management of the more frequent causes of child illness (diarrhoea, acute respiratory infection).

- **Pre-existing pattern of utilization of health services:** oriented towards access to SHC, secondary health care neglecting primary healthcare, only understood for administrative functions

- **Poor health behaviours:** frequent smoking habits, dietary issues, sedentary lifestyles, and obesity. This requires public health interventions (coherently with host countries) but also triggers demand for services for addressing NCD.

- **Excessive consanguinity** in some areas of origin of refugees, aggravated by the limitations of movement caused by the conflict, leading to potential high incidence of neonatal or congenital abnormalities.

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250 Field visit observation.

251 RRP6 MYU, page 11. This is confirmed by info provided at UNHCR portal, but considering children persons under 18 years.
• **Psychological trauma** due to a number of factors related to the war leading to mental health disorders. Serious conditions tend to be institutionalized in Syria and the displacement of people with serious mental health disorders creates a demand for mental health services at a community level and for access to institutionalized services.

• **War injuries**: In Lebanon, 5.78% of refugees have a significant injury, according to a recent survey. 252 80.3% of those are wounded as a direct consequence of the war. Patients are not accounted for as persons of concern for UNHCR until the circuit of surgical procedures has been completed and early discharge to a registration point takes place. From there, this type of patient has little or no assistance, other than from international NGOs and partisan or Syrian social support groups.253

Weak institutional engagement has been mentioned frequently as an additional challenge. The RRPs include in the description of targets a significant number of Lebanese (around 50% of global target for primary healthcare consultations in RRP6), but the definition of this target and the strategy to achieve it are not clear. Concerns remain about the situation in informal settlements, where the lack of information is more prevalent and where vulnerabilities can be more concentrated. The health consequences of unsafe accommodation frequently used by refugees, in terms of injuries and disease, must be noted.

Is there an adequate referral strategy for complicated cases that go beyond the scope of primary healthcare? (12.2)

There is referral system for complicated cases, based on a standard operating procedure, and operated through private health services providers and a Third Party Administrator (Globe-Med). It excludes 25% of the financial costs of referrals, which must be covered by the patient.254

Most respondents say that the system in place to address vulnerability—centred on local or religious NGOs—is insufficient. The referral system is regarded as restrictive by some stakeholders, and endowed with limited capacity for refugees to make decisions.255

Since June 2013, the pattern of secondary healthcare referrals stabilized at around 0.5% of the refugee population in all regions, after a peak in the first half of 2013. The average cost of referrals has increased while the per capita cost has decreased as the number of refugees in need of services has grown. Neonatal costs have increased significantly. UNHCR’s share has decreased. (See table below.)

**SHC Referral patterns, summary evolution from 2013:**256

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2014 (January - April)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total referrals</td>
<td>41,168</td>
<td>19,214</td>
</tr>
<tr>
<td>Obstetric</td>
<td>40% (30.5% CS)</td>
<td>48% (22.8% CS)</td>
</tr>
<tr>
<td>Gastrointestinal</td>
<td>8%</td>
<td>5.9%</td>
</tr>
<tr>
<td>Trauma/injury</td>
<td>7.3%</td>
<td>6.3%</td>
</tr>
<tr>
<td>Neonatal/congenital</td>
<td>5%</td>
<td>4.5%</td>
</tr>
</tbody>
</table>

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252 Hidden Victims of the Syrian crisis: disabled, injured and older refuge, Helpage and HI, 2014

253 The proportion of serious injuries with need of rehabilitation is higher in Jordan, reflecting probably access of combatants through the border for treatment.


255 Statement based on informants, local and INGOs.

256 Data from referral data summaries _all 2103 _ V3, and referral data summaries _2014 _Jan – April.
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<table>
<thead>
<tr>
<th>Medical Service</th>
<th>Total Cost</th>
<th>Per Capita Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total cost</td>
<td>Per capita cost</td>
</tr>
<tr>
<td>Surgery</td>
<td>4.5%</td>
<td>48 USD</td>
</tr>
<tr>
<td>Respiratory infections</td>
<td>9.2%</td>
<td>37 USD</td>
</tr>
<tr>
<td>Hospitals</td>
<td>82,88</td>
<td>82,88</td>
</tr>
<tr>
<td>Total cost</td>
<td>23.8 million USD (77.6% paid by UNHCR)</td>
<td>11.3 Million USD (8,285,859, approved UNHCR share, 73.2 %)</td>
</tr>
<tr>
<td>Obstetric</td>
<td>35.1%</td>
<td>580 USD</td>
</tr>
<tr>
<td>Neonatal</td>
<td>10.9%</td>
<td>606 USD</td>
</tr>
<tr>
<td>Mean cost</td>
<td>35.7%</td>
<td>606 USD</td>
</tr>
<tr>
<td>Per capita cost</td>
<td>37 USD</td>
<td>37 USD</td>
</tr>
</tbody>
</table>

The Exceptional Care Committee (ECC) within UNHCR deals with specific, tertiary and expensive cases. Neonatal care is the more expensive procedure, reaching an average cost of 1,258 USD per admission in 2013, and 1,774 USD in 2014. A possible strategy to limit this would be to enforce access to obstetric care only if antenatal visits have been followed and cases that will present complications are detected. Information on unviable cases would help avoid unnecessary admission in intensive care. An evaluation of mortality and complications of admitted patients at discharge will be advisable given the cost involved.

Cases not included within the standard operating procedures are not covered. Specific cases can be addressed through the Exceptional Care Committee (ECC). For the January-April 2014 period, the share not covered by UNHCR amounted to $3,000,000 (to be covered by the patient or a supporting private NGO) while $1,500,000 in claims were rejected for not complying with the standard operating procedure. Since June 2013, the pattern of referral stabilised to around 0.5% of the refugee population in all regions following a peak in the first half of 2013.

**Targeting**

Targets and related indicators are based on estimates and are debatable. Documents reviewed and statements from key respondents support the conclusion that the demand for services has been poorly estimated or defined. This has made the response more reactive than strategic or proactive. The health profile and contextual situation of Syrian refugees is more prone to chronic and non-communicable diseases, with specific middle income country health challenges, such as obstetric and postnatal care needs, rather than with mortality concerns. No detailed planning of the needs for this type and size of population in this county context is evident. No proper planning of the needs for this type and size of population seems evident, nor has there been an assessment of the options by which to shape the offer to match demand.

No data or evidence suggests abnormal mortality or morbidity rates. The nature of the health system (highly privatized) and the weakness of government health system capacities, including public health and

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257 Data from referral data summaries_all 2103_V3, and referral data summaries_2014_Jan April, documents provided by UNHCR and available at website.

258 From the RRP6 doc, pages 46 and 47: “It is estimated that 5% of new-borns will be premature and suffer from neonatal distress and congenital malformations, needing prolonged medical care. Partners project that a further 5,000 refugee children need specialized care for life-threatening conditions in 2014. /.../20% of the displaced population are expected to have mental health disorders in 2014” Expecting having 20% of the refugees (more than 200,000 persons in July 2014) to have mental health disorders is calling for a public health emergency and we doubt on the basis for this statement. The same could be said on the figure of expected rate of neonatal distress or congenital malformations. The targets are obtained adding up refugees and Lebanese and maybe PRS, treated by UNRWA, while we do not have clear means to understand if these groups are included in the reporting.

259 Relatively small and populated country with a wide network of practitioners/clinics/charities that would in principle detect any threat even in the absence of a public information system.
data collection and management, makes it difficult to obtain reliable and systematic data on health issues, including attendance rates, morbidity patterns, immunization coverage, etc.

During the crisis surveillance system was reinforced with the collaboration of WHO and UNHCR (the weekly Epi-monitor). Some qualified respondents question, however, the validity/accuracy of information from this surveillance system.

Documents reviewed and statements from key informants support the conclusion that the demand for health services has been poorly analysed and the response has been largely reactive rather than proactive and strategic. The general lack of preparedness to address the demands is a missed opportunity. The registration process could have been an opportunity to define eventual demand for services, as well to define desirable health outcomes for refugees.

Responding to the demand should not imply providing what the refugees were obtaining at home and addressing expectations of accessing services even of best quality (or more expensive) in the host country. Needs should have been defined from the information available or specific surveys, attention should have been paid to define a basic basket of services to be covered, information on the limitations of the offer, promotion of primary healthcare and a major emphasis of primary healthcare actors with specific tools to channel the demand through them. Lessons from how UNRWA provides health services to Palestine refugees could have been better leveraged. UNRWA provides services through a number of providers and has developed an efficient primary health care network. It has a quality assurance system and attempts to improve health information services of service providers to Palestinians. This is done for an estimated population of around 250,000 refugees. The moment to try to assert possible synergies (common rates, prequalification criteria, etc.) was in mid 2013, when Syrian refugee numbers were still in the range of 300,000. The model chosen by UNHCR, apparently, was to step up from the strategy put in place for Iraqi refugees (which numbered in the few thousands). Just as an example UNRWA primary health care clinics provided more than one million consultations in Lebanon, and more than 30,000 patients received hospital care (most of them internal medicine cases).260

Gaps

- **Mental health**: the launching of a National MHPSP261 with the support of the MoH and WHO seems to be a step towards including mental health in the primary level of care. This implies a reform of the primary healthcare and of the mental health approach overall. Some solutions should be put in place to improve the capacity of the current aid effort to deal with mental health issues in the shorter term.

- **Disabilities and rehabilitation needs** is a gap in the Lebanese health system. A better knowledge of the needs and specific challenges is required. A recent survey describes some of the needs of people with disabilities.262

- **Problems of availability of drugs for NCDs**: This is a structural gap, aggravated by the influx of refugees that has exhausted the procurement system. This requires support to the MoH and to YMCA (dealing with a centralized procurement for NCD drugs). The EU’s “stability fund” includes some provisions to address this but more comprehensive donor involvement will be needed to ensure availability of drugs and medical supplies in public facilities.

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260 UNRWA Health Department, Annual Report 2013.
261 Mental Health and Psychological Support Program.
Challenges for access to secondary healthcare. The establishment of a 25% contribution for patients accessing services raises some questions on gaps addressing vulnerabilities. There is a need to develop clear and effective systems to identify and follow vulnerable refugees requiring health services. An alternative to the direct reimbursement of fees for service needs to be developed.

Patient transport. No emergency transport services are available in informal settlements. This has been mentioned as an important limitation for access by national and international NGOs.

Moving Forward

Recommendation 12: A joint health strategy between MoH and UNHCR and other partners should be envisaged and needs to widen the scope to include development partners.

Recommendation 13: UNHCR needs to refocus programmatically and strategically on primary healthcare. Issues of access should be addressed to facilitate a frequentation according to standards. One possible option to increase attendance to primary healthcare could be linking secondary healthcare’s programme adherence to primary healthcare access: ANC linked to obstetric care/deliveries, for instance. In addition, means to better frame the current informal system (local NGOs, Syrian underground) in a primary healthcare strategy need to be addressed.

Recommendation 14: Given the scale of resources allocated and the number of beneficiaries reached, UNHCR should be more proactive in ensuring an adequate level of healthcare for refugees. Clear information on the package of services and ways to access them should be provided and monitored through community-based mechanisms. Respondent interviews and other evidence strongly suggest that there is a gap in terms of communication to beneficiaries on health related issues and services. There are no sound patient satisfaction mechanisms and the system is not patient or client centred. As such, there is a need to refocus on refugees as clients, not as passive subjects.

Recommendation 15: The Exceptional Care Committee (ECC) and its counterpart for Lebanese should be provided with standard operating procedures and funds to address needs of refugees and Lebanese. Tertiary cases and complicated ones need to be channelled through new mechanisms, supported by donors and integrated in the host country. The ECC should be integrated with means to refer specific cases, through GoL involvement or other specific mechanisms funded by donors.

Recommendation 16: Aspects of client satisfaction and negotiated rates should be more closely followed by UNHCR, establishing targets and mechanisms for the third party administration. There is a need for a shift to treating refugees as clients, instead of treating UNHCR as the client of Globe-Med. The limited possibility to register complaints other than those related to standard operating procedures turns managing complaints into an administrative activity related to Globe-Med functions, while the possibility of channelling useful refugee data and information to UNHCR is lost.

Recommendation 17: The challenges in Lebanon require greater managerial capacities in the health sector than those that UNHCR has in place. The fact is that P3 level staff are dealing with such complexity is viewed as an area of institutional weakness. UNHCR capacity in the health sector should be increased with more staff, and their profile enhanced and adapted to the context (i.e. P4 or P5 levels with managerial capacities and M&E expertise) to deal with the complex context of service providers and insurance schemes. Capacity was greater for instance in Jordan. In 2013, UNHCR established specific staff dedicated to coordination in the health sector and this has been extremely positive.

Recommendation 18: If the situation becomes chronic, UNHCR may consider the creation of an adapted scheme for the coverage of refugee medical expenses (sick fund), anchored in pre-qualified service providers and financed though specific tools (e.g. trust funds). This would not spare the Third Party Administrator, but would offer some possible efficiency gains and a midterm solution for the situation in
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middle-income countries. Alternatively, donors should support the GoL in covering the costs of services provided to refugees and vulnerable Lebanese, which is difficult to put in place in a context of private service providers. Specific solutions to improve the situation of vulnerable Lebanese are urgently required in order to prevent the scaling up of tensions.

7.5.7 Education
The public schooling system in Lebanon catered for less than 300,000 pupils during the 2012/2013 school year. Public schools in Lebanon lack both the capacity and resources to accommodate the large increase in school-aged children resulting from the influx of Syrian refugees projected at 300,000. Common barriers to education of Syrian refugee children include: lack of space in public schools and overstretched resources, the cost of tuition fees and transportation, differences between Lebanese and Syrian curriculum, including language barriers, safety concerns of Syrian parents.

Interruption of learning significantly threatens the future prospects of Syrian refugee children and increases their exposure to protection risks. The Ministry of Education and Higher Education (MEHE) in Lebanon supported by UNHCR took an open and active approach to respond to the education needs of Syrian refugees, granting them the right to enrol in public schools. However, since the beginning of the school year in October 2013, MEHE managed to accommodate only 75,000 Syrian children (or 30%) in primary public schools, leaving the rest out of the education system. UNHCR’s strategy in the education sector has focused on increasing education opportunities for school-aged children through:

- **Formal Education**: ensuring access for refugee children through payment of tuition fees; creating space for children in the public system through school rehabilitation, “second shifts”.

- **Non-Formal Education**: increasing other educational opportunities for school-aged children including Accelerated Learning Programs and community-based education programmes and other pathways to certified and quality education.

- **Support to the Ministry for Education and Higher Education (MEHE)**: providing coordination support, the secondment of staff to central and regional offices to ensure information-management and monitoring, as well as providing equipment and material support to schools and regional offices.

Given constraints, UNHCR has not yet achieved the education objectives with only 20% of the Syrian refugee youth enrolled in schools. In 2012/2013, 30,000 Syrian refugees were in school, mostly in grades 1-4 cycle one and two. In 2013/2104, 70,000 Syrians were in school. There is a lack of reliable education data from the MEHE and UNHCR, a lack of double shift schools or qualified primary schooling, and a lack of a separate education programme in Lebanon.

The right to education is fulfilled for 40% of boys and girls in a protective learning environment. However, 60% of refugee children are not in school. The capacity of government officials and partners to strengthen national capacity to respond to the needs of Lebanese children is low.

The Lebanese system went from one shift to double shifts without clear mechanisms in place to ensure quality. School administrators often don’t know enrolment in the double shift and how many Syrian refugees their schools serve. From the 1,200 public schools in Lebanon, only 70 have double shift. There is no continuous assessment during Grades 1-6. Consequently, examination during Grade 6 leads to a high number of dropouts because children are not well prepared. UNHCR cannot tackle dropout rates as long as the MEHE has a policy of no continuous assessment from grades 1 – 6 and only an examination at grade 6.

UNHCR is financially supporting the double shift system for 30,000 refugee children in Lebanon. It is also funding the catch-up program (ALP) and has rehabilitated schools, supported schools with T&L materials and teachers with TT. A transportation system exists to bring Syrian children from settlements to schools in Lebanon.
Under the global plan, UNHCR supports children who display academic excellence in technical education with scholarships, with a view to helping them become engineers and rebuild the country in the future (19 Syrians, 40 Iraqis and 1 Somali).

Summer programmes are organised to support language courses for Syrians to integrate better in the Lebanese school system but the number enrolled is insufficient. A catch up programme was confused in the beginning as it was meant only to prepare Syrian children for entrance into Lebanese primary schools.

One factor that could contribute to quality issues and the overall strain on Lebanese primary schools is the lack of a harmonised and coordinated response at the field level between local NGOs, the MEHE, and UNICEF and UNHCR. This is especially so with the MEHE whose role is critical.

Access to education is also a factor. Schools are often far from refugee settlements and this presents both security concerns as well as issues for general willingness of parents to send their children to school. Syrian refugee children have also dropped out of schools as a consequence of harassment and discrimination.

There is also no long-term education strategy or national development plan that could be aligned with the education strategies for refugee children. UNHCR is trying to make forge links in education but has no concrete plans yet as education in Lebanon is still located under Community Services and is not a separate sector in its own right. Under Lebanon’s Decentralisation Act, an education officer is recruited together with for local EOs. The professional development of teachers and educational personnel has been delayed.

There are indicators in place in the education sector and targets but impact is not measured through a monitoring system. Even the exact number of children out of school is not known. Monitoring at child and school level is lacking, to avoid duplications in the program, to keep track of children, to avoid budget overlap and to monitor the achievements of children. Monitoring the flow of the UNHCR budget to schools, NGOs should have the time to follow this up and MEHE should come on board.

Although NGOs do a great deal of reporting, there is no central point where all this information is retained. Nevertheless, the NGO Reach is piloting data collection/analysis and management for UNHCR in Akkar.

UNHCR is focusing on double shift schools to increase the enrolment of Syrian children. However, the cost of $630 calculated by MEHE is too high ($1000 per child with the cost of implementing partners). UNHCR wants to prioritise shifts but is aware of the problem of cost and the lack of sustainability of the effort overtime.

An education plan is underway but further infrastructure will be required until expansion is possible in both the camps and urban settlements. Other key outstanding issues include the certification of Syrian graduates and the possibility for students to graduate from one cycle to the other.

The back to learning programme is identifying out-of-school children, while offering enrolment support to schools and non-formal education. Summer programmes are organised to support language courses for Syrians, thereby helping children to better integrate into the Lebanese school system. Moreover, two ALP curricula exist: an old one, which is more of a catch up program, and a new one supported by UNICEF for cycle 1, 2 and 3.263

For the 2013/14 school year, UNHCR supported more than 50,000 Syrian children to enrol in a first shift and a second shift it established to expand capacity. The financial and administrative implications are heavy. Total funding requirements for the sector were estimated at a steep 451 million USD for 2014 which still left 60% of children aged 5 to 17 without any form of education. As of September 2014, the sector was only 42% funded. In September 2014, Syrian refugee children were not yet enrolled and were awaiting

263 This responds to evaluation question 13.2.
decisions from the Ministry who had decided to regularise enrolment. The Ministry announced the possibility of expanding access to the first shift to Syrian refugee children, depending on the level of the international community’s funding commitment.

**Recommendation 19:** UNHCR could focus more on adopting a coordinating role in the Education sector rather than an implementing one. UNHCR could also share some sector programmes with other partners, as a sector-wide approach is advisable. This should include a harmonisation of efforts between UNHCR, UNICEF, NGOs and the MoE. Essentially, UNHCR can play a facilitation role. The roles of each stakeholder should be reviewed and sanctioned if not executed within the agreed framework. A firm should be hired to handle the financial aspects of the framework, thus allowing NGO/UNHCR to concentrate on real education and quality issues. More face-to-face contacts between UNHCR and MEHE are necessary to clarify roles and activities.

### 7.6 Effectiveness

Overall UNHCR’s response to the influx of refugees in Lebanon has been effective and is considered successful. UNHCR given its mandate and the leadership in place was effectively able to prioritise its Lebanon operation and scale-up its capacity and response.

The protection response in RRP6 for Lebanon has five objectives, namely: access to territory and respect of refugee rights; community empowerment and outreach strengthening, in particularly aiming at assisting persons with specific needs; prevention and response to SGBV; child protection; and durable solutions.

RRP 5 and 6 do not include protection objectives and indicators that can be easily converted into programmatic design and activities.\(^{265}\) In the absence of a significant baseline, confusion in terminology between outputs and outcomes,\(^{266}\) the treatment of outcomes as sub-objectives (in RRP6), and the struggle to identify relevant indicators, often conflating beneficiaries and benefits, it is difficult to measure progress except as reported.\(^{267}\)

As regards Objective 1, which is the one most clearly formulated and where UNHCR exercises effective leadership, achievements were evident and acknowledged by virtually all respondents. In this context, respondents also stated that this was possible given UNHCR’s commitment in Lebanon and its advocacy efforts. The latter, most state, aim at achieving any possible improvement in terms of refugee rights protection, in a difficult context with few applicable legal precedents.

Objective 2 of the Protection Response focuses on strengthening community empowerment and outreach, including for the purpose of reaching out to persons with specific needs. It has the largest budget among RRP6’s five protection objectives.

Outputs under this objective are as ambitious as they are vague. Output 2.1 reads “community empowered and benefiting from community-based services”; Output 2.2 is “community self-management is strengthened and expanded.” Issues of community-based approaches and “empowerment” tend to be over simplified and/or lacking in enough specificity to be applicable in practice. Partner staff involved in

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\(^{264}\) This responds to evaluation questions 1.8 & 1.1.2.

\(^{265}\) Objectives 3 and 4, relating specifically to SGBV and CP are not even formulated as objectives but more as ‘issues’.

\(^{266}\) In the RRP5 the causal link between outputs and outcomes is reversed.

\(^{267}\) Among the protection sector indicators in the RRP6 Lebanon are: “no. of persons benefiting from empowerment activities”; “no. of children benefiting from psycho-social support”. These figures, per se, can probably indicate how many participated in such activities but not really whether they have ‘benefited’ from them. Similarly, “no. of persons submitted for resettlement or humanitarian admission” can simply be an indicator of the internal efficiency of UNHCR, unless it is implied that all cases submitted were accepted; “no. of protection concerns or violations reported and/or addressed” is not as relevant as “% of cases positively resolved out of the total no. of cases referred” would have been.
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Community work and outreach struggled to explain how their work contributes to the ‘empowerment’ of the refugees and the host communities. It is also questionable whether the overall set-up of the response and the RRP framework are geared towards producing this kind of impact, which by definition “requires change at the individual and structural levels.”

A more realistic and meaningful “interpretation” of this objective was put forward in RRP6. This considers outreach as a means, rather than an objective, namely “meeting refugees and affected Lebanese communities where they are, to identify needs, provide services and monitor delivery.”

This is being done through a complex set of activities, initiatives and synergies among different actors, partners, institutional partners, refugee and host communities. As of May 2014 services and outreach activities were supported in 27 community centres selected - among the many more operated by MoSA – in locations where large numbers of refugees coexist with very poor host communities. However, this is in no way a guarantee of the future sustainability of the centres. The allocated budget of USD 250,000 per centre might turn out to be prohibitive for MoSA.

The importance of reaching out to the most vulnerable in a context in which the refugees are so dispersed cannot be overestimated. Progress is being made with the Refugee Outreach Volunteer (ROV) network that is being rapidly expanded. ROVs disseminate information in the community about services, assist in the identification and prioritisation of protection cases and are a vital link between the refugees, the host communities and the humanitarian organizations. They are expected to reach individuals with special needs, including persons with disability, the elderly, female-headed households and other individuals at risk of neglect, discrimination or abuse. Specific SOPs have been developed for this purpose.

The mobilization of ‘specialized’ ROVs (in health, education and SGBV/child protection) among the refugees with specific background and/professional qualifications is positive. It enhances the quality of community work while providing a venue for refugees to put their knowledge and skills to the service of their community. This presents an opportunity to build capacities that refugees will be able to use in the future to re-build their country, an issue repeatedly raised by national partners.

Community participation in the end is only meaningful if the concerns and needs of refugees are taken into due consideration in programming. It is the evaluators’ impression that community work is definitely more effective in terms of identification and follow-up of vulnerable cases than it is as a participatory approach. Input from both partners and refugees do not support the claim that the results of community participation/discussions with the refugees were incorporated in RRP6.

**Recommendation 20:** UNHCR should strengthen monitoring systems related to community outreach and social cohesion. Without this, community outreach risks various missed opportunities that can only be spotted when the complexities of a community are understood and the dynamics and changes monitored closely over time.

**How does UNHCR prioritise in a context of underfunding and increasing needs? (1.1.2)**

In a context of increasing need, underfunding and reaction to the emergency and a short-term vision, the key to prioritization has been to lower vulnerability thresholds and coverage.

Despite the difficulties being faced in fully funding the RRP and the repeated acknowledgments of UNHCR respondents of more difficulties to come, there is little on the way of strategies and tactics that could identify the most vulnerable and how best to meet their needs with less resources. This would include

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268 A Community-based approach in UNHCR Operations. UNHCR, January 2008 (p.20).
269 Note on Outreach in the Lebanon Operation. UNHCR Lebanon 9 March 2014.
270 “Note on Outreach in the Lebanon Operation.” UNHCR Lebanon, 9 March 2014.
efficiency, cost effectiveness, and other measures that would ensure that every dollar spent was properly leveraged.

In terms of programming and sectors in 2015, UNHCR plans to prioritise protection, health and education.

7.6.1 Are the assistance needs of the most vulnerable refugees met equitably and adequately? (Assistance) (1.2)

Evidence suggests that the assistance needs of refugees are not met fully.

### Qualitative Evidence: Are the assistance needs of the most vulnerable refugees met equitably and adequately? (EQ 1.2; Assistance; ALL RESPONDENTS)

|   | 1  | 2  | 3  | 4  | 5  | 6  | 7  | 8  | 9  | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 |
|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| 21|    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 41|    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 61|    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 81|    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 101|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 121|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 141|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 161|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    | 200 |
| 181|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    | 200 |
| 201|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
| 221|   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |   240 |

23% positive
33% negative

Graph 40

When this qualitative evidence is examined, a range of issues is cited that could be improved. This is related to the complexity of the response, especially in a fragmented context like that in Lebanon.

7.6.2 Does the targeting and planning of long-term national programs benefit from a structured dialogue and a timely provision of quality inter-agency assessment information? (1.5)

Several assessments indicate that women and girls face specific access constraints in terms of assistance and services. The current absence of gender- and age-disaggregated analysis may impact women’s and girls’ access to services.

Assessment results indicate that access to assistance is reportedly more constrained for those who have recently arrived, non-registered refugees, the elderly, persons with physical or mental disabilities and female-headed households. A standardisation of methodologies used for identifying the most vulnerable refugees is needed. (See section on assessment)

There is considerable discontent among UNHCR’s partners about the process and implications of targeting as rolled out in Lebanon. IP frustrations relate to the fact that the vulnerability criteria on which targeting is based are not clear and that insufficient data is available to undertake targeting in a satisfactory manner. Moreover, refugees were not fully informed about changes in assistance and a communication strategy was lacking, leaving NGOs in the field to deal with the consequences of informing the beneficiaries about the changes.
7.6.3 *Have satisfactory humanitarian standards (e.g. Sphere and/or UNHCR) been met? (1.6)*

Humanitarian standards have been met except in the shelter sector where SPHERE standards have not been maintained and in the Education sector due to the low coverage and quality. In the shelter sector, not all temporary shelter and settlement solutions were considered safe and adequate. Given contextual constraints, sufficient surface was unavailable to respond to the shelter needs of a growing number of refugees. Although lifesaving health assistance was raised as a key gap in the response with the decreased coverage and increasingly limited access of Syrians to secondary healthcare services, healthcare standards, healthcare standards for refugees are acceptable in Lebanon, similar to the ones for the local population. The overall success is that most of refugees have reasonably accessed healthcare when needed, while their numbers increased exponentially and challenged UNHCR and partners capacity to manage the caseload. No data or evidence suggests abnormal mortality or morbidity rates.

Even in a deregulated context, healthcare providers respect some basic standards, and in the case of insurance schemes, standards are rigorous. GlobeMed, UNHCR Third Party Administration, requires a level of standards of practice to the providers that invoice to UNHCR.

### 7.7 Coverage

#### 7.7.1 *How does UNHCR ensure that the maximum number of refugees in need receive protection and assistance? (2.1)*

The difficult and complex situation in Lebanon, with refugees dispersed across widely varying contexts in the country, present distinct coverage issues. This is amplified by respondents’ comments:

<table>
<thead>
<tr>
<th>Qualitative Evidence: Does UNHCR ensure that the maximum number of refugees in need receive protection and assistance (in health)? (EQ 2.1; ALL RESPONDENTS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
</tr>
<tr>
<td>21</td>
</tr>
<tr>
<td>51% Negative</td>
</tr>
</tbody>
</table>

Graph 41

With increased focus on targeting and diminishing funding available, coverage becomes an increasing concern. For UNHCR, decentralization efforts aim, among others, to enhance coverage and ensure better targeting of vulnerable groups. With the increasing numbers and the difficulty in addressing the needs of refugee families, targeting assistance will be more and more necessary. UNHCR’s strategy has focused on increasing outreach through increased capacity of teams to address growing vulnerability.

Current interventions are insufficient to respond to the increasing refugee numbers. In the shelter sector, existing shelter options are limited and the reception capacity of host families exhausted. New arrivals will continue to resort to spontaneous and often sub-standard shelter options, mainly informal settlements.

UNHCR has faced the challenge of finding sufficient partner capacity to cover needs in certain sectors across all geographic areas. The reflection at the time was that there were fewer partners who were able to undertake WASH activities in certain areas and in contrast, that there were too many actors involved in the provision of non-food related cash assistance. Responses in sectors have not always covered the range of needs. For instance WASH activities have focused on upgrading facilities distributing hygiene kits with less attention to other WASH needs such as hygiene promotion, solid waste management and operation and maintenance of WASH facilities such as desludging and water supply.²⁷¹

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Also, at the time of the Evaluation, donor focus was encouraging greater coverage of needs in specific areas (e.g. Arsal) and this was perceived by stakeholders interviewed as displacing partner capacity or partner presence interest on the ground.

According to interviewees and reports, a lack of communication between humanitarian aid agencies and local service providers causes many potential beneficiaries to be denied services. Local-level relief actors and municipalities on the front lines are not receiving information pertaining to UNHCR’s programs to support Syrian refugee school registration fees, transportation services and healthcare reimbursement.

Confusion regarding refugee services and Lebanese government policies targeting Syrian refugees are either unknown or not believed to be available. Most notable is the $200 government fee that foreigners must pay to extend their stay in Lebanon beyond 12 months, which has so far not been waived for refugees.

Due to limitations on funding and capacity, the impact of the humanitarian situation on certain groups in Lebanon (e.g. within the refugee population older, disabled and injured refugees, adolescents and youth) has not been documented or broadly addressed. There is a tendency to advocate in favour of the creation of working groups as a mechanism to address, advocate for, and mainstream issues concerning specific groups. Multi-sectorial comprehensiveness of approaches is a key aspect that humanitarian relief agencies have difficulty addressing within a sector based response system that not always encourages integrated approaches.

UNHCR’s assistance targets registered refugees. The existence of an unknown number of unregistered refugees is well known to UNHCR. The reasons for this are myriad, including: fear that registering might mean being associated with particular factions; distrust of the purpose and/or benefits of registration; protection and assistance are either not needed or are received through different channels, etc. UNHCR’s efforts to ensure that all refugees were informed about the registration procedure and could register if wished have been considerable. Mobile registration has been organised for refugees with concerns about moving freely, as well as for detainees and persons with disabilities. Free transportation is offered to refugees in remote areas.

UNHCR has been very responsive to some IP claims that significant numbers of refugees were not informed about registration and has encouraged all partners to provide feedback about specific cases. The Evaluation team believes that it is unlikely that refugees not register due to a lack of knowledge of the registration process.

7.7.2 What makes being registered by UNHCR important? (2.2)

Three important aspects should be highlighted: building trust in UNHCR’s impartiality (since Lebanon in polarised between the regime and the opposition); mainstreaming the added value of registering with UNHCR (for example health remains a weak spot and refugees turn to faith-based organisations, often close to the Radical Islamist movement; and being as inclusive as resources permit while maintaining transparency and making room for appeals.

Enhanced registration allows UNHCR to collect in-depth information on vulnerabilities and protection needs. All efforts are made to reach out to the most vulnerable.

While refugees mainly see and are interested in UNHCR’s role as a service provider, they do acknowledge the protection value of registration and in particular in relation to security related issues. Refugees

272 UNFPA, UNHCR, UNICEF, Save the Children, UNESCO, Situation Analysis of Youth in Lebanon Affected by the Syrian Crisis, April 2014.

273 “Protection Monitoring Form.” UNHCR. Updated 4 March 2014.
interviewed in the field acknowledged that the UNHCR registration document generally facilitates freedom of movement even in the absence of proper residency documents.

7.8 Appropriateness

7.8.1 Do assessments and targeting ensure that needs and priorities are identified?\textsuperscript{(3.1)}

There is a clear negative trend in respondent comments regarding assessments and targeting:

<table>
<thead>
<tr>
<th>Qualitative Evidence: Do assessments and targeting ensure that needs and priorities are identified?</th>
</tr>
</thead>
<tbody>
<tr>
<td>(EQ 3.1; ALL RESPONDENTS)</td>
</tr>
<tr>
<td>1</td>
</tr>
<tr>
<td>21</td>
</tr>
<tr>
<td>41</td>
</tr>
<tr>
<td>61</td>
</tr>
</tbody>
</table>

3% Positive
37% Negative

Graph 42

The credibility and accuracy of assessments are the basis for needs-based planning and have long-lasting effects on everything from the quality of interagency coordination, to donor funding levels and relationships with national governments, local nongovernmental organizations (NGOs) and disaster-affected populations.

To gain knowledge of the living conditions of Syrian refugees and inform decision-making and programming, UNHCR, UNICEF and WFP conducted a joint multi-sectorial household survey of the registered and pre-registered Syrian refugee population in Lebanon in 2013 known as the Vulnerability Assessment of Syrian Refugees in Lebanon (VASyR). A second VASyR was carried out in 2014. The objective of the survey was to provide a multi-sectorial profile and to determine vulnerability criteria of the refugee population, in order to enable humanitarian stakeholders to improve their programming and to target assistance for the most vulnerable. The VASyR has helped inform targeting processes to date.

The VASyR, however, is more of a snapshot that helps summarise findings “72% of individuals (equal to 68% of households) continue to be sufficiently vulnerable to warrant continued food and non-food assistance”.\textsuperscript{275} As the VASyR’s aim is to “enable humanitarian stakeholders to improve their programming and to target assistance for the most vulnerable”, it is not really concerned with the reasons why, for example, some households are reliant on humanitarian aid more than others, or some head of households are more successful than others at finding jobs and addressing vulnerabilities.

The Evaluation finds that assessments undertaken for the purpose of reducing the caseload are unlikely to result in better targeting and will probably precipitate under-inclusion. It would also be problematic were UNHCR to define protection needs as a function of its financial capacity to meet them. Better targeting requires a significant expansion of outreach capacity, which is on-going, and a far better level of monitoring, assessment and especially analysis, which has yet to materialise. Collecting qualitative or quantitative data through monitoring forms is important. So too is it equally important is to translate such data into meaningful information.

\textsuperscript{274} This includes responses to this question’s sub-questions, mainly 3.1.1 – 3.1.3.

\textsuperscript{275} VASyR, p. 5.

\textsuperscript{276} IBID, p. 8.
The view of stakeholders in Lebanon is that there is not a comprehensive assessment of needs and that while numerous assessments have taken place these are not sufficiently synthesised, analysed and linked to on-going vulnerability analysis and prioritized interventions in geographical areas. The continuous influx and movement of refugees across different locations makes it challenging to keep information on needs and gaps up to date and the geographic spread of refugees makes it difficult to identify needs, which are different in each location. Comprehensive assessments across 1,700 locations require considerable time and resources. However, proper monitoring and updating of needs is critical in this crisis due to the increasing/changing numbers of affected people and their locations.

Certain sectors (e.g. WASH) have focused on the problem and tried to identify solutions. The WASH Sector Strategy highlighted “significant gaps in the understanding of WASH needs, specifically:

- Limited information regarding needs of all beneficiary groups (...), on needs across all contexts, such as in small shelter units and for those renting or living in/hosted accommodation.
- Lack of relevant, consistent and detailed [...and] up to date information.”

The Inter-agency Working group proceeded to develop a standardised assessment methodology for rapid, in-depth and continuous WASH assessments and incorporate it in the WASH Sector Assessments Guideline, thereby improving the comparability of data and enabling a more systematic and standardised analysis and presentation of findings. Other sectors could follow this example.

In an effort to enhance the humanitarian response in Lebanon, the Inter-Agency Multi-Sector Needs Assessment (MSNA), aimed to help prioritise humanitarian assistance, by identifying the most pressing needs, within and among sectors, and identify gaps in assisting these priority needs. During the MSNA process, and as stated in its report, the terms of reference (TOR) were found to be “too ambitious, in terms of time and scope, to identify priorities among sectors.” The report highlights a number of weaknesses and limitations. More significantly, there is currently no mechanism in place to track needs, priorities and vulnerabilities on a sub-national level in Lebanon.

The Information Management working group has since set up a common assessment unit, similar to the model used in Jordan, which looks at process, methodology and usefulness. An assessment registry has been established and the Assessment Working Group (AWG) has developed a methodology checklist to assist organizations undertaking assessments in Lebanon and guide the AWG Methodology team will use this guide in their discussions with organizations that have submitted assessments for endorsement.

7.8.2 Are activities associated with assessments and targeting sensitive to the local context and customs? (3.2)

The modalities of intervention appear to have been generally sensitive to local context and custom. Where it was realized that it had not been the case, efforts were done to learn from experience. There are important lessons to be learned from the winterisation programme where the evaluation found that there was a lack of information on who was included and why and the need for a better communication strategy.

As in other contexts, some refugees commented on the feeling that they were over assessed and that there was limited or no assistance that resulted from these exercises. IPs signalled that they had engaged on occasion in culturally inappropriate initiatives when assuming that urban refugees could be integrated in community efforts and a part of WASH committees. In terms of standards, separate WASH facilities for men and women were preferred and these had not been foreseen. Remarks concerning a lack of sensitivity to local contexts and customs include: reports of informing refugees by SMS that assistance has been discontinued; the use of cars perceived to be too big and imposing; working with refugees without paying a

courtesy visit to the local authorities; holding artistic activities, such as music or plays etc., next to mosques and/or in conservative localities; and sending unaccompanied junior staff to the field.

7.8.3 How well has UNHCR adapted to changes in the situation and made effective use of contingency planning? (3.3)
A number of possible emergency scenarios have been considered and are documented in the Inter-Agency and in the UN Country Team Contingency Plans. Respondents claimed that contingency planning had recently improved and that there were greater efforts deployed towards emergency preparedness for high-risk scenarios including mass influx of refugees, disease outbreak and water scarcity and that certain partners maintained contingency stocks.

Please see Section 4.8.3 in the Jordan report as the findings and conclusions remain the same for Lebanon.

7.9 Connectedness

7.9.1 Does UNHCR actively make the link between humanitarian actions and the longer-term impact for refugees, host communities, and others? (6.3)
See section 7.3 for issues related to connectedness.

Recommendation 21: UNHCR should persist in its efforts to encourage the Lebanese government to create a functional Task Force on Syrian Refugees. Ideally, this would be an office at the Ministry of State in the light of the problems plaguing the Higher Relief Council (the Council’s Chair was imprisoned for corruption and the Council has not been involved in dealing with the Syrian crisis since).

7.10 Efficiency

Please see the section on Efficiency in the Jordan report (Section 6.9) as the same issues apply in Lebanon.

National staff salaries

Among the key issues raised related to efficiency that affect both Lebanon and Jordan is the decision on the part of UNHCR to harmonize its contribution to NGO staff costs. The Evaluation was not able to view any data or assessment on the part of UNHCR that informed its decision-making on this issue. It is not clear how cost-effective placing caps on national staff salaries is in a context where partner capacity needs to be improved, partners (and UNHCR) have invested resources in building the skills of national staff and the onus is on retaining national staff and reducing expatriate staff.

UNHCR Processes

UNHCR has short planning cycles and agreements are renegotiated 3-4 times and sometimes more during the year, which is putting an extra burden on both UNHCR and implementing partners. UNHCR in Lebanon had 9 OL increases in 2013 and had to revise its agreements with every increase. The initial low operating spending level, duration and funding available in sub-agreements are seen as a constraint hindering proper programming.

UNHCR Representation opted to cover all core activities from the beginning of the year for a shorter period, and to extend the agreements as the OL is increased allowing for more consistency and a wider range of core activities implemented throughout the year. There is a risk that OL increases will not materialize and therefore activities will have to be interrupted because of lack of funds.

The agency also has regulations that affect its ability to make the best use of funding. There are no systems within UNHCR to properly use to its advantage and that of the response the benefits of flexible and additional predictability of multi-year funding. Good Humanitarian Donor principles and good practice included as Good Practices in Donor Financing, Management and Accountability the introduction of longer-term funding arrangements. While the larger donor contributions from main donors given their volume
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Draft Report

would remain annual in the case of UNHCR, it is a missed opportunity for UNHCR that the agency not be in a position to benefit from better funding modalities which can improve its level of efficiency and the quality of its response.

Also, when funds arrive late in the year, which is traditionally the case when donors try to allocate their remaining unspent funding, it is difficult for UNHCR to plan and UNHCR rules and regulations force the agency to spend funds within the calendar year. This leads UNHCR to prioritise the type of activities it can spend in time as opposed to following a needs-based approach and spending funds received on what the agency wants to do.

The initial Operating Level in Lebanon for 2014 was higher than the Lebanon earmarked contribution. UNHCR was therefore committing funding over and above what was earmarked by donors for Lebanon. In contrast to Jordan, however, key donors in Lebanon (e.g. US) were not earmarking their contributions specifically for Lebanon. UNHCR programme staff despite this higher OL considered the initial OL to be far too low and a real handicap for better planning and implementation. The process is further complicated by the fact that the field lacks systems that help track earmarked funding from donors and understand what resources are available. UNHCR prioritises responding to refugee responses and has faced a considerable funding gap in 2014 for its response in Lebanon, which would call for the contribution and use of un-earmarked funding. The Lebanon operation also benefitted from additional flexibility with a three-month derogation in 2014 for 2013 funding. A standard 6-month derogation period extending implementation cycles to 18 months would be warranted.

Recommendation 22: UNHCR can take stock of the constraints posed by its internal procedures and regulations, and how these have affected its response in a large-scale operation such as Lebanon where it is very much in the lead, and the consequences of its systems and processes on the entire response. UNHCR should identify the measures that have better enabled it to function (e.g. derogation, operating level at the start of the year that is above the level of commitments) and introduce them as new operating modalities that allow the agency to better respond to this crisis and in the future.

UNHCR in its programming and agreements is paying the price of shorter-term arrangements that include higher costs and less value for refugees. For example when UNHCR engages in short term agreements a mobile unit is often rented at a high cost instead of leased or purchased. A similar logic applies to arrangements and assistance to beneficiaries where for instance in the shelter sector households benefit from accommodation for a year and not beyond this period.

Recommendation 23: UNHCR should develop systems to better track earmarked funding from donors in the field that will help programme staff understand which financial resources are currently available.

7.10.1 How willing and effective has UNHCR been in introducing refinement and innovation across the sectors to transition to a more cost-effective, sustainable response to a protracted situation? (6.5)

There are several examples of refinement and innovation that have been introduced but there is no indication of these leading sectors to transition to a more cost-effective sustainable response to a protracted refugee situation.

In the context of an unprecedented scale of a response the out of camp environment has helped introduce innovation. Examples of this include the introduction of a private for-profit third-party administrator in the health sector, which could offer an innovative way of addressing challenges in middle income countries.

278 Although data for 2014 is not available, an estimated fifth of UNHCR’s contributions are un-earmarked and over a further 20% are loosely earmarked at the regional level.
Questions of cost-effectiveness and efficiency could be raised and have to be evaluated and UNHCR’s technical capacity in the health sector should be adapted to these new approaches.

At the same time, and given the scale of the country, stakeholders within the context of Lebanon, recognise the need for further strategic engagement with the private sector. The challenge of managing health services for one million refugees in a privatised context probably requires a corporate approach with which to rethink the role of UNHCR and define alternative options to the payment of private providers’ fees. The country is already a showcase of funding schemes, be it mutual funds, sick funds or private insurance schemes. The option chosen, i.e. reimbursement on a fee-for-service basis, might not be the most efficient. A similar situation applies to the education and shelter sectors. Addressing this issue would require specific expertise in these fields, and the proposal of alternative options. UNHCR is likely to face this challenge more and more often, in urbanised middle income countries that will require a type of services that prove to be more complex than has been the case so far.

With the benefit of hindsight UNHCR could have better assessed its overall investment in the provision of services and assistance across different sectors and over a longer time period to have a better bargaining power and negotiation capacity with private suppliers (i.e. health sector providers, property owners, etc.) in Lebanon.

7.10.2  What is the level of timeliness of the response in terms of both planning and delivery? (5.3)

Overall, the timeliness of the response has improved with high refugee registration rates. Newcomer assistance has also ensured that refugee assistance does not incur delays and there are fast track processes for both protection and health cases.

This finding is in juxtaposition with a fairly negative trend amongst respondents:

![Graph 43](image)

The timeliness of assistance has been affected by delays that are a result of delayed signing of agreements and recent decentralisation. Low initial operating levels and delayed signing of agreements with partners and renegotiation of these, also affect and delay implementation.

7.11  Impact

7.11.1  Do UNHCR’s pre-determined objectives (RPP6) safeguard the rights and wellbeing of refugees? Could they be expanded, reduced and/or changed to better meet the needs of the refugees? (4.1)

The Evaluation found that UNHCR’s pre-determined objectives intended to safeguard the rights and wellbeing of refugees. These include general objectives and sub-objectives for each sector. Expected outputs and indicators support these further. The RRP process has, however, encouraged a bottom-up process where activities and outputs appealed for and planned are categorised under sub-objectives and objectives.
Objectives have changed in each RRP iteration and will again be revised in the 3RP. From an evaluation perspective this dilutes focus and thus long-term impact. Objectives have for the most part not changed but been re-categorised.

7.11.2 How does UNHCR prioritise different objectives in light of different needs/activities and actual financial, organisational, and other resources? (4.1.1)

Overall, UNHCR will prioritise core protection activities in light of its core mandate. In terms of protection activities, registration efforts have been prioritised. In addition, UNHCR intends to focus on the Health and Education sectors that have received donor support and been a strong area of UNHCR expenditure within the RRP.

7.11.3 What monitoring measures and indicators are in place to track the impact that financial assistance/cash response is having on the poverty/welfare of refugee households? (15.3)

The simplification of distribution mechanisms (e.g. the move from in-kind to paper vouchers to e-vouchers) would free up more time and resources for post-distribution monitoring.

There is an observed weakness in impact monitoring, especially by UNHCR. WFP, by contrast, is doing relatively better, with systematic post-distribution monitoring and price monitoring. There is very little evidence that supports Evaluation-informed decision-making despite its importance, such as, for example, ex-ante Evaluation of the winterisation program and/or a compendium of lessons learned. Even possible positive economic impacts of conditional and unconditional cash on some sectors (rent, retail, supplies and additional demand) are barely documented.

After the field phase of our mission, both UNHCR and WFP launched calls for impact monitoring (UNHCR ‘Study on the Impact of Cash Assistance on Reducing Negative Coping Mechanisms among Syrian Refugees; and WFP ‘Cash vs. E-voucher Programme in Jordan and Lebanon’, undertaken in collaboration with the International Initiative for Impact Evaluation.)

7.11.4 Is there evidence that refugees recognise how UNHCR and its partners’ actions intend to meet their protection and assistance needs? (4.3)

As noted in Section 7.10.4, 91% of the households surveyed feel that being registered is important. 37% also say that their immediate assistance needs were met by UNHCR. (See Graph 44.)

In another HH survey question, respondents favourably comment upon how different organisations meet their needs, making special note of UNHCR. (See Graph 45.)

Graph 44
7.11.5 How effectively and systematically has UNHCR sought, analysed and responded to beneficiary feedback? (4.3.1)

The RRP poses that “Throughout the region, and in close coordination with host governments, RRP partners will work to harmonise vulnerability assessments, assistance packages and undertake regular joint monitoring to review validity and reliability of criteria, adequacy of assistance provided and develop strategies that mitigate the risk of long-term dependency. Feedback mechanisms and Evaluations will be designed to ensure that refugees are included in the decision-making process.” However, this has yet to be translated into practice. There is no system in place to ensure the accountability of UNHCR and partners vis-à-vis refugees. Participatory assessments are carried out as a basis for the implementation of a rights and community based approach to refugee protection in Lebanon. These, according to UNHCR, provide a valuable opportunity for UNHCR and partners to ensure that activities and programmes are responsive to the ever changing context in which refugees live.

Useful insights can be drawn from the household survey. The word ‘analysed’ is significant here, as most efforts by UNHCR are reactive rather than proactive, in the sense that they are mostly focused on understanding the situation so as to target it better.

The range of stakeholders highlighted existing weaknesses in M&E within UNHCR. A number of persons interviewed within UNHCR felt that there was a limited organizational culture for M&E. Processes were further complicated by the lack of a baseline, the existence of different formats or competing result matrices and plans (UNHCR’s RBM, the RRP, activity info and indicators defined in UNHCR agreements with IP). The absence of dedicated M&E staff or functions was seen as a handicap. According to interviewees, senior managers at country level were not really familiar with using result information to influence programme decision-making in the inter-agency context.

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### 8.1 Evaluation Questions

<table>
<thead>
<tr>
<th>Evaluation Questions</th>
<th>Sub Questions (These include sector/activity questions from ToR, as indicated, that help answering primary questions. This list is not exhaustive.)</th>
<th>Link to ToR EQs</th>
<th>Answered Jordan</th>
<th>Answered Lebanon</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Effectiveness</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Has UNHCR been effective in reaching pre-determined objectives?</td>
<td>1.1.1 What are the successes and on-going constraints associated with Regional Response Plan (RRP) Process?</td>
<td>Overall</td>
<td>6.6.1; 6.6.5; 6.3.6</td>
<td>7.6 &amp; 7.5; 7.3.7</td>
</tr>
<tr>
<td></td>
<td>1.1.2 How does UNHCR prioritise in a context of underfunding and increasing needs?</td>
<td></td>
<td>6.3.6</td>
<td>7.5.1</td>
</tr>
<tr>
<td></td>
<td>1.1.3 How might the RRP process be changed/adapted going forward?</td>
<td></td>
<td>6.3.6</td>
<td>7.3.7</td>
</tr>
<tr>
<td>1.2 Are the assistance needs of the most vulnerable refugees met equitably and adequately? (Assistance)</td>
<td>1.2.1 Food: Has food assistance met life-saving needs? (8.1)</td>
<td>8.1</td>
<td>6.2; 6.5.5</td>
<td>7.2; 7.5.3</td>
</tr>
<tr>
<td></td>
<td>1.2.3 NFI: Has the winterisation package been adequate, delivered in a timely fashion, and on a sufficiently substantial scale to adequately face winter conditions? (9.2)</td>
<td>9.2</td>
<td>6.5.7</td>
<td>7.5.5</td>
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<tr>
<td></td>
<td>1.2.4 Shelter: Has the range of shelter interventions, i.e. tented settlements, rehabilitation of sub-standard shelter, rental subsidy and other forms of shelter intervention been adequate? (10.1)</td>
<td>10.1</td>
<td>6.5.2</td>
<td>7.5.1</td>
</tr>
<tr>
<td></td>
<td>1.2.5 Shelter: Have the accommodation needs of out-of-camp refugees been adequately addressed? (10.2)</td>
<td>10.2</td>
<td>6.5.2</td>
<td>7.5.1</td>
</tr>
<tr>
<td></td>
<td>1.2.6 Shelter: Has camp/site planning (where applicable) been adequate? (10.5)</td>
<td>20.5</td>
<td>6.5.2; 6.5.3</td>
<td>7.5.1</td>
</tr>
<tr>
<td></td>
<td>1.2.7 WASH: Have refugees received an adequate supply of safe water in accordance with accepted standards? (11.2)</td>
<td>11.2</td>
<td>6.5.4</td>
<td>7.5.2</td>
</tr>
<tr>
<td></td>
<td>1.2.8 Public Health: What measures have been taken since the onset of the crisis to ensure adequate medical coverage for essential health needs? (12.3)</td>
<td>12.3</td>
<td>6.5.8</td>
<td>7.5.6</td>
</tr>
<tr>
<td></td>
<td>1.2.9 Public Health: Is there an adequate referral strategy for complicated cases that go beyond the scope of primary healthcare? (12.2)</td>
<td>12.2</td>
<td>6.5.8</td>
<td>7.5.6</td>
</tr>
<tr>
<td></td>
<td>1.2.10 Education: How successful has UNHCR been in ensuring that as many school-age children and adolescents/youth as possible gain access to education or appropriate learning opportunities respectively? (13.1)</td>
<td>13.1</td>
<td>6.5.9</td>
<td>7.5.7</td>
</tr>
<tr>
<td></td>
<td>1.2.11 Education: What measures have been taken to explore opportunities for informal education? (13.2)</td>
<td>13.2</td>
<td>6.5.9</td>
<td>7.5.7</td>
</tr>
<tr>
<td></td>
<td>1.2.12 COMM: What measures are in place to take account and track incidences of social tension between local populations and refugees, and what has been the range of responses? (14.2)</td>
<td>14.2</td>
<td>6.1.4</td>
<td>7.1.7</td>
</tr>
<tr>
<td></td>
<td>1.2.13 COMM: What practical steps have been taken to foster reflection and coordinate</td>
<td>14.5</td>
<td>6.1.4</td>
<td>7.1.7</td>
</tr>
</tbody>
</table>
### Beyond Humanitarian Assistance?

**UNHCR and the Response to Syrian Refugees in Jordan and Lebanon**

Draft Report

<table>
<thead>
<tr>
<th>1.3</th>
<th>Do refugee women, girls, boys and men have equitable access to protection, including access to territory? (Protection)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3.1</td>
<td>How are refugees' rights recognised, respected and protected?</td>
</tr>
<tr>
<td>1.3.2</td>
<td>What contributes to and/or constrains refugees' ability to access territory?</td>
</tr>
<tr>
<td>1.3.3</td>
<td>Has community empowerment, outreach and self-reliance been strengthened towards the assistance provided to persons with specific needs?</td>
</tr>
<tr>
<td>1.3.4</td>
<td>What is being done to prevent and respond to sexual and gender based-violence (SGVB)? What else could be done?</td>
</tr>
<tr>
<td>1.3.5</td>
<td>What is being done to protect children from neglect, abuse and violence? What else could be done?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1.4</th>
<th>Do the most vulnerable host communities benefit from improved access to quality essential services and access to livelihood opportunities, thereby ensuring that an increased number of refugees benefit from community based protection? (Protection)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4.1</td>
<td>COMM: Was UNHCR's involvement in assisting local authorities and communities well designed and appropriate? (14.1)</td>
</tr>
<tr>
<td>1.4.2</td>
<td>COMM: What measures are in place to take account and track incidences of social tension between local populations and refugees, and what has been the range of responses? (14.2)</td>
</tr>
<tr>
<td>1.4.3</td>
<td>COMM: How adequately has UNHCR addressed the challenge of engaging with governments, donors and development agencies on the need to secure longer term support and funding to meet stabilisation needs? (14.4)</td>
</tr>
<tr>
<td>1.4.4</td>
<td>COMM: What practical steps have been taken to foster reflection and coordinate policy and interventions in support of mixed refugee and local communities? (14.5)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1.5</th>
<th>Does the targeting and planning of long-term national programmes benefit from a structured dialogue and a timely provision of quality inter-agency assessment information? (Coordination; durable solutions)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>New</td>
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</table>

<table>
<thead>
<tr>
<th>1.6</th>
<th>Have satisfactory humanitarian standards (e.g. Sphere and/or UNHCR) been met?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.7</td>
<td>Are appropriate systems and indicators in place to monitor, measure, or assess impact?</td>
</tr>
<tr>
<td>1.7.1</td>
<td>Food: Is the beneficiary coverage correct and regularly monitored for food assistance? (8.3)</td>
</tr>
<tr>
<td>1.7.2</td>
<td>Public Health: Is there reliable data/credible evidence available about abnormal morbidity and mortality rates or otherwise? (12.1)</td>
</tr>
<tr>
<td>1.7.3</td>
<td>Does UNHCR generate accurate, comprehensive, and useful data and comprehensive and timely reporting? New</td>
</tr>
<tr>
<td>1.7.4</td>
<td>COMM: What measures are in place to take account and track incidences of social</td>
</tr>
</tbody>
</table>

| 1.2.14 | Cash: What monitoring measures and indicators are in place to track the impact that financial assistance/cash response is having on the poverty/welfare of refugee households? (15.3) |

| 1.7.1 | Food: Is the beneficiary coverage correct and regularly monitored for food assistance? (8.3)                                |
| 1.7.2 | Public Health: Is there reliable data/credible evidence available about abnormal morbidity and mortality rates or otherwise? (12.1) |
| 1.7.3 | Does UNHCR generate accurate, comprehensive, and useful data and comprehensive and timely reporting? New                     |
| 1.7.4 | COMM: What measures are in place to take account and track incidences of social                                               |
## Beyond Humanitarian Assistance?
**UNHCR and the Response to Syrian Refugees in Jordan and Lebanon**

**Draft Report**

1. What are the primary variables that have supported and/or constrained UNHCR’s capacity to meet the RRP6 Strategic Objectives as they relate to Lebanon & Jordan?

| 1.8 | Draft Report | 5.3 | 6.5 & 6.6 | 7.5 & 7.6 |

### Coverage

1.1 How does UNHCR ensure that the maximum number of refugees in need receive protection and assistance?

| 2.1 | Draft Report | 3.1 | 6.7.1 | 7.7.1 |

### Appropriateness

#### 3.1 Do assessments and targeting ensure that needs and priorities are identified?

<table>
<thead>
<tr>
<th>3.1.1 Food: Is the level/form of food assistance appropriate? (8.2)</th>
<th>2.1; 8.2</th>
<th>6.8.1; 6.5.5</th>
<th>7.8.1; 7.5.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1.2 NFI: Have the NFIs provided by UNHCR and its partners been appropriate and useful for the refugees? (9.1)</td>
<td>2.1; 9.1</td>
<td>6.5.7</td>
<td>7.5.5</td>
</tr>
<tr>
<td>3.1.3 Shelter: Has the range of shelter interventions, i.e. tented settlements, rehabilitation of sub-standard shelter, rental subsidy and other forms of shelter intervention been appropriate? (10.1)</td>
<td>2.1; 10.1</td>
<td>6.5.2; 6.5.3</td>
<td>7.5.1</td>
</tr>
</tbody>
</table>

### Impact

#### 4.1 Do UNHCR’s predetermined objectives (RRP6) safeguard the rights and well-being of refugees? Could they be expanded, reduced and/or changed to better meet the needs of the refugees?

| 4.1.1 How does UNHCR prioritise different objectives in light of different needs/activities and actual financial, organisational, and other resources? | 5.1 | 6.10.1; N/A | 7.11.1 |

### Efficiency

#### 5.1 Does UNHCR have mechanisms in place to determine and measure operational efficiency (direct costs) in the Syria response in Lebanon and Jordan?

| 5.1.1 How do different planning tools and processes affect operational efficiency? | 2.1, 2.2 | 6.9.1 | 6.9.1 |

#### 5.2 What does UNHCR do to ensure/improve efficiency in its operational response?

<p>| 5.2.1 Public Health: Is there an adequate referral strategy for complicated cases that go beyond the scope of primary healthcare and is it cost effective? (12.2) | 6.9.2; 6.5.8 | 6.9.2; 7.5.6 |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Question</th>
<th>New or Old</th>
<th>Subsection</th>
<th>New or Old</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.2.2</td>
<td>5.2.2 CASH: Is cash assistance a cost-effective way to replace traditional in-kind multi-sectorial assistance? (15.1)</td>
<td></td>
<td></td>
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<tr>
<td>5.3</td>
<td>What is the level of timeliness of the response in terms of both planning and delivery?</td>
<td></td>
<td></td>
<td>6.5.6</td>
</tr>
<tr>
<td>5.4</td>
<td>Does UNHCR provide sufficient value to justify inherent transaction costs/comparative advantages between donors, itself and partners?</td>
<td>2.1, 2.2</td>
<td>6.9.4</td>
<td></td>
</tr>
<tr>
<td>6.5</td>
<td>What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ protection and assistance needs in Jordan &amp; Lebanon?</td>
<td>New</td>
<td>6.2 &amp; 6.5</td>
<td></td>
</tr>
<tr>
<td>6.2</td>
<td>What should UNHCR consider going forward to strengthen its capacity to meet refugees’ protection and assistance needs?</td>
<td>Section 3</td>
<td>Section 3</td>
<td></td>
</tr>
<tr>
<td>6.3</td>
<td>Does UNHCR actively make the links between humanitarian actions and the longer-term impact for refugees, host communities, and others?</td>
<td>New</td>
<td>6.3</td>
<td></td>
</tr>
<tr>
<td>6.4</td>
<td>How can UNHCR strengthen the way it works with partners, national/local governments, and others to meet refugees’ protection and assistance needs?</td>
<td>1.5</td>
<td>6.3</td>
<td></td>
</tr>
<tr>
<td>6.5</td>
<td>How willing and effective has UNHCR been in introducing refinement and transition to a more cost effective, sustainable response to a protracted situation?</td>
<td>New</td>
<td>6.9.3</td>
<td></td>
</tr>
<tr>
<td>7.1</td>
<td>Is protection recognised as a critical element that is associated with all aspects of refugees’ lives rather than as a separate programmatic element?</td>
<td>New</td>
<td>6.1.1</td>
<td></td>
</tr>
<tr>
<td>7.2</td>
<td>What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ protection needs? (Effectiveness)</td>
<td>New</td>
<td>6.1.2</td>
<td></td>
</tr>
<tr>
<td>7.3</td>
<td>Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ protection needs? Could they have done anything different given the context in Jordan and Lebanon? (Impact)</td>
<td>New</td>
<td>6.1.7</td>
<td></td>
</tr>
<tr>
<td>7.4</td>
<td>What could UNHCR do differently to strengthen how it ensures refugees’ protection? (Sustainability)</td>
<td>New</td>
<td>6.1.8</td>
<td></td>
</tr>
<tr>
<td>8.1</td>
<td>What variables contribute to and/or constrain UNHCR’s capacity to meet refugees’ assistance needs? (Effectiveness)</td>
<td>New</td>
<td>6.2.5</td>
<td></td>
</tr>
<tr>
<td>8.2</td>
<td>Given known constraints and the rapidly changing context, do UNHCR and its partners meet refugees’ assistance needs? Could they have done anything different given the context in Jordan and Lebanon? (Impact)</td>
<td>New</td>
<td>6.2.6</td>
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</table>
### 8.3 What could UNHCR do differently to strengthen how it provides assistance? (Sustainability)

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<thead>
<tr>
<th>Section 3</th>
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<th>Section 3</th>
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<tbody>
<tr>
<td>6.4.1</td>
<td>New</td>
<td>7.4.1</td>
</tr>
<tr>
<td>6.4.2</td>
<td>New</td>
<td>7.4.2</td>
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<tr>
<td>Section 3</td>
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<td>Section 3</td>
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### 9 Durable Solutions

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<tr>
<td>7.3 &amp; 7.3.1</td>
<td>New</td>
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<tr>
<td>7.3.4 &amp; 7.5.2</td>
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</tbody>
</table>

### 9.1 Does UNHCR’s current strategy (RPP6) adequately address durable solutions in the context of Jordan and Lebanon? (Impact)

<table>
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<tr>
<th>Section 3</th>
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<tbody>
<tr>
<td>6.5.2</td>
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<tr>
<td>6.5.4</td>
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</tbody>
</table>

### 9.2 What links have been established that encourage the eventual absorption of humanitarian interventions into longer term national programmes?

### 9.3 What does UNHCR need to do differently and/or consider going forward to ensure that it works toward the absorption of humanitarian interventions into longer-term national programmes? (Sustainability)

### 10 Coordination

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<tr>
<th>Section 3</th>
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<tbody>
<tr>
<td>7.3.3</td>
<td>New</td>
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<tr>
<td>7.5.7</td>
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</tbody>
</table>

### 10.1 Does UNHCR promote partnership and help to promote synergies and avoid duplications, gaps and resource conflicts at the situational/regional, country and sector-specific levels?

#### 10.1.1 Shelter: Was there sufficient technical expertise to coordinate and implement shelter sector activities? (10.4)

##### 1.1; 10.4

#### 10.1.2 WASH: Has the coordination of WASH activities with UNICEF and other key partners been well coordinated? Was there a clear and adequate division of labour? (11.1)

##### 1.1; 11.1

#### 10.1.3 Has UNHCR coordinated well with UNICEF and UNFPA in programmes targeting child protection and SGBV? (7.5)

##### 1.1; 7.5

#### 10.1.4 Education: Has there been effective coordination of policy development and interventions among the agencies and organisations participating in the education sector? (13.3)

##### 1.1; 13.3

#### 10.1.5 Education: Has there been a clear and adequate division of labour with UNICEF with regard to education interventions? (13.4)

##### 1.1; 13.4

#### 10.1.6 Cash: How effectively have different cash interventions by UNHCR and its partners been coordinated? Were they provided in an appropriate manner? (15.2)

##### 1.1; 15.2

## 10.2 How do different stakeholders describe UNHCR’s coordination role?

#### 10.2.1 How effectively has UNHCR coordinated with OCHA, HCTs, the HC and the CRSF / country plans?

##### 1.3/New sub question

#### 10.2.2 How has the response model introduced over the past three years contributed to broader objectives?

##### New

#### 10.2.3 What implications/consequences have followed from UNHCR’s leadership in place of the Humanitarian Coordinator, and the decision to establish sectoral working groups instead of clusters?

##### New

### 10.3 What changes, if any, to UNHCR’s coordination role/arrangements should be envisaged going forward? What lessons can be derived from UNHCR’s coordination role for other responses?

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<tr>
<th>Section 3</th>
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<th>Section 3</th>
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<tbody>
<tr>
<td>6.3.7</td>
<td>New</td>
<td>7.3.8</td>
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</table>
8.2 D&A Reports

Jordan and Lebanon reports available as separate Annexes.

8.3 Post-field Phase Survey

Results available as a separate Annex.
### 8.4 Regional Response Plan Objectives Compared

The following table illustrates how objectives have changed from RRP4 through RRP6. This illustrates a penchant for “wordsmithery” and unnecessary labour more than for changing the circumstances and needs of refugees. This also dilutes opportunities for strategic thinking and planning by changing the primary goals year in and year out. A much more systemic use of objectives will have countless positive knock-on effects by simply encouraging consistency and discipline.

**Codes:** ◇ = Some wording changes but substantially the same. ◇ ◇ = Substantive changes. ◇ ◇ ◇ = New.

<table>
<thead>
<tr>
<th>Objectives RRP4</th>
<th>Objectives RRP5</th>
<th>Objectives RRP6</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategic Objectives (RRP 4)</strong></td>
<td><strong>Strategic Objectives (RRP5)</strong></td>
<td><strong>Strategic Objectives (RRP6)</strong></td>
</tr>
<tr>
<td>Objective 1: Ensure that Syrians and other refugees fleeing from the Syrian Arab Republic have access to the neighbouring territories, to seek asylum and to receive protection, including protection from refoulement.</td>
<td>Objective 1: to accommodate in camps 300,000 Syrian refugees who have entered or will enter Jordan irregularly and provide them with protection, emergency assistance and care. ◇</td>
<td>Strengthen the protection of women, girls, boys, and men affected by the Syrian crisis in Jordan, including through advocating for international burden-sharing, ensuring access to the territory and registration of Syrian refugees, preventing refoulement, and by preventing and responding to violations of protection norms, with emphasis on child protection (CP) and sexual and gender-based violence (SGBV). ◇ ◇</td>
</tr>
<tr>
<td>Objective 2: Ensure that the basic needs of Syrians and other refugees fleeing from the Syrian Arab Republic are met, with special attention to the most vulnerable.</td>
<td>Objective 2: to support Syrian refugees in urban and rural settings, with a particular focus on vulnerable families, estimated at 60% of an overall population of 700,000.</td>
<td>Ensure the effective protection, reception of and assistance to Syrian refugees in camps, with an emphasis on maintaining humanitarian standards across all sectors while moving towards more efficient, participatory and sustainable methods of delivering assistance. ◇ ◇</td>
</tr>
<tr>
<td>Objective 3: to support communities hosting Syrians to mitigate the negative socio-economic impact of the increased Syrian population on national infrastructure, and increase direct assistance to vulnerable Jordanians.</td>
<td>Objective 3: to support communities hosting Syrians to mitigate the negative socio-economic impact of the increased Syrian population on national infrastructure, and increase direct assistance to vulnerable Jordanians.</td>
<td>Reinforce the resilience of host communities, through support to basic services benefiting both host populations and refugees in urban and rural areas in the immediate term, increasing awareness of, equitable access to, and the quality of such services. ◇</td>
</tr>
<tr>
<td>Objective 3: Undertake contingency measures for a potential mass influx.</td>
<td></td>
<td>Fulfilled.</td>
</tr>
<tr>
<td>Protection (RRP 4)</td>
<td>Protection (RRP 5)</td>
<td>Protection (RRP6)</td>
</tr>
<tr>
<td>Objective 1: Ensure that Syrians are able to access the territory, to seek asylum and to receive protection, including protection from refoulement.</td>
<td>1. Syrians are able to access the territory, to seek asylum and be protected from refoulement. ◇</td>
<td>1. Refugees fleeing Syria are able to access the territory, to seek asylum and their rights are respected. ◇</td>
</tr>
</tbody>
</table>
Objective 2: Ensure that the basic needs of Syrians are met with special attention for the most vulnerable (especially women, children, people with disabilities (PWD) and elderly).

2. Syrian protection needs are addressed through targeted protection interventions (including CP and SGBV), community mobilization and capacity building. ◆

3. The risks and consequences of SGBV experienced by women, girls, boys and men are reduced and/or mitigated, and the quality of response is improved. ◆

Objective 3: Ensure that communities are mobilized and supported in the response to Syrians’ needs and self-reliance opportunities explored.

3. Respond to the needs of Syrians and vulnerable host community populations with an emphasis on women and children through provision of social and psychosocial support.

4. Refugees, host communities and organizations involved in the refugee response are provided with adequate information and reached with awareness-raising activities. ◆

4. Community empowerment, engagement, outreach and self-reliance is strengthened and expanded, and women, girls, boys and men are engaged in the planning, implementation and evaluation of services. ◆

5. Third country resettlement options are explored as a protection response to cases people with special needs or vulnerabilities. ◆

5. Durable and protection solutions are made available to refugees from Syria. ◆

<table>
<thead>
<tr>
<th>Education (RRP 4)</th>
<th>Education (RRP 5)</th>
<th>Education (RRP 6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Ensure that vulnerable Syrian children have sustainable access to formal and remedial education.</td>
<td>1. Ensure that vulnerable Syrian girls and boys are provided with access to formal education in camps and non-camp settings. ◆</td>
<td>1. Children and youth have sustained access to appropriate education opportunities. ◆</td>
</tr>
</tbody>
</table>

2. Ensure that vulnerable Syrian children benefit from informal and non-formal education services at community level.

2. Ensure that Syrian girls and boys, adolescents and youth benefit from informal and non-formal education services in host communities and camps. ◆

3. Ensure that Syrian children, including pre-school-age children, benefit from specialized education services.

3. Ensure that Syrian girls and boys including preschool age children and children with disabilities benefit from education services. ◆

4. Ensure that effective referral mechanisms are in place through coordination and case management with links to other sectorial services.

4. Ensure that effective referral mechanisms are in place through coordination and case management with links to other sectorial services. ◆

Food (RRP 4)

1. Ensure food security of Syrians in need.

2. Maintain the nutritional status.

1. Enhance food and nutrition security. ◆

2. Maintain appropriate, consistent food support to Syrian refugees in urban/rural areas, camps and transit centres. ◆

2. Improve food security including food availability, access and utilization for vulnerable Jordanian populations through targeted food production and livelihood interventions. ◆

1. Maintain food security and improve food availability, access and utilization for Syrian refugees in Jordan through appropriate and consistent food
3. Initiate food assistance, livelihood support, self-reliance and food production programmes to most vulnerable Jordanians affected by the Syrian Crisis.

3. Improve the nutritional status of Syrian refugees, particularly malnourished girls and boys under the age of five and pregnant and lactating mothers.

3. Prevent depletion of limited resources of vulnerable Syrians.

4. Integrate cross-cutting themes such as gender, environment and social protection in food security and livelihood interventions.

4. Ensure effective and coordinated sectorial response through evidence based food security and livelihood interventions.

Health (RRP 4)

1. To improve the health status of the vulnerable displaced Syrians in Jordan through granting access to the needed health services.

2. To grant vulnerable displaced Syrians in Jordan optimal access to reproductive healthcare services and HIV services.

Health (RRP 5)

1. To ensure access of Syrians in most affected Governorates in Jordan to quality primary health services and for vulnerable Syrians to life-saving or life sustaining, secondary and tertiary care services by end of 2013 while minimizing the negative impact on Jordanian health systems through strengthening the MoH’s capacity and filling key gaps in health.

2. To ensure access of Syrians and vulnerable Jordanians in high burden Governorates to priority information and services for sexual and reproductive health services.

Health (RRP 6)

1. Improve equitable access, quality and coverage to comprehensive primary healthcare for Syrian refugee women, girls, boys and men in Jordan by end of 2014.

2. Improve equitable access, quality and coverage to essential secondary and tertiary healthcare for Syrian refugee women, girls, boys and men in Jordan by end of 2014.

3. Support the capacity of the national healthcare system to provide services to Syrian women, girls, boys and men and vulnerable Jordanians in the most affected governorates.

4. Improve coverage of comprehensive health and rehabilitation services to Syrian refugees through integrated community level health and rehabilitation interventions by end of 2014.
3. To ensure access of Syrians and vulnerable Jordanians to comprehensive mental health services in the most affected Governorates by end of 2013. 

4. Integrate nutrition into primary healthcare in order to prevent and respond to malnutrition including micronutrient deficiencies and promote optimal nutritional status amongst children under five, women of reproductive age and other vulnerable persons in high burden Governorates by end of 2013. 

<table>
<thead>
<tr>
<th>Non Food Items (NFIs) (RRP 4)</th>
<th>Non Food Items (NFIs) (RRP 5)</th>
<th>Non Food Items (NFIs) (RRP6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>Ensure that the basic household needs of vulnerable Syrians living within host Community, transit sites and camps are met through NFI assistance. ✓</td>
<td>1. Ensure that the basic household needs of women, girls, boys and men are met. ✓</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Financial Assistance (RRP 4)</th>
<th>Financial Assistance (RRP 5)</th>
<th>Financial Assistance (RRP6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>Ensure that the basic household needs of extremely vulnerable Syrians living in urban and rural areas across Jordan are met through financial support. ✓</td>
<td>1. Ensure that the needs of extremely vulnerable Syrian refugees as well as Jordanians affected by the refugee crisis are covered across Jordan. ✓</td>
</tr>
<tr>
<td></td>
<td>2. Ensure that coordination is continuously enhanced in order to deliver quality cash assistance in the most efficient and targeted manner possible to women, girls, boys and men. ✓</td>
<td>2. Ensure that coordination is continuously enhanced in order to deliver quality cash assistance in the most efficient and targeted manner possible to women, girls, boys and men. ✓</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Site and Shelter (RRP 4)</th>
<th>Site and Shelter (RRP 5)</th>
<th>Shelter and Settlements (RRP6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>1. Ensure access to adequate space for transit centre works, for camp site development works, for construction of basic infrastructure and for implementation of essential community facilities. ✓</td>
<td>1. Syrian refugee women, girls, boys and men settled in planned and developed camps with adequate shelter and access to basic facilities and services. ✓</td>
</tr>
<tr>
<td></td>
<td>2. Syrian Refugees in camps and transit centres have access to adequate shelter guided by minimum humanitarian standards. ✓</td>
<td>2. Syrian Refugees in camps and transit centres have access to adequate shelter guided by minimum humanitarian standards. ✓</td>
</tr>
<tr>
<td></td>
<td>3. Camp management is assisted with maintenance and upgrading interventions for shelter and basic services provided for Syrians. ✓</td>
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</tr>
<tr>
<td></td>
<td>4. Vulnerable Syrians outside of camps have access to adequate shelter. ✓</td>
<td>4. Vulnerable Syrians outside of camps have access to adequate shelter. ✓</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water, Sanitation &amp; Hygiene (WASH) (RRP 4)</th>
<th>Water, Sanitation &amp; Hygiene (WASH) (RRP 5)</th>
<th>Water, Sanitation &amp; Hygiene (WASH) (RRP6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. To provide displaced Syrians with access to safe water and improve sanitary and hygiene conditions. (FROM HEALTH)</td>
<td>1. Ensure regular access for Syrian refugees living in camps to sufficient and safe drinking water; secure and clean sanitation and hygiene facilities which are culturally appropriate for both genders. ✓</td>
<td>1. Affected populations are ensured with safe, equitable and sustainable access to sufficient quantity of water for drinking, cooking and personal and domestic hygiene. ✓</td>
</tr>
<tr>
<td></td>
<td>giving consideration to those with special needs. ◊</td>
<td>2. Affected populations have access to safe and appropriate sanitation facilities. ◊</td>
</tr>
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</tr>
<tr>
<td></td>
<td>3. Affected populations have reduced risk of WASH-related diseases through access to improved hygienic practices, hygiene promotion and delivery of hygiene products and services on a sustainable and equitable basis. ✫</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Improve access to WASH services and facilities to vulnerable Syrians and urban and rural host communities. ✫</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Establish and maintain effective mechanisms for WASH coordination at national and sub-national levels. ◊</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Rehabilitate and install gender appropriate water and sanitation facilities for boys and girls in schools, youth/child-friendly spaces and public places in camps and host communities.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Establish and maintain effective mechanisms for WASH coordination at national and sub-national levels</td>
<td></td>
</tr>
</tbody>
</table>
8.5 Bibliography

This includes the sources cited in the report. It does not list all documents referred to in the Evaluation.

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