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Operational Guidelines on Complementary Pathways

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INTRODUCTION

The UNHCR Operational Guidelines on Complementary Pathways (CPOG) is the first operational guidance that aims at supporting UNHCR colleagues in Headquarters, Bureaux and the field when designing and implementing complementary pathways activities globally.

This document is comprised of two parts: 1) definitions, typology and main protection principles; 2) UNHCR's role.

Part I of the Guidelines sets out the stage defining key elements in the space of complementary pathways. It covers the scope, rationale and vision of the guidance and provides the legal foundation behind complementary pathways. It also introduces key concepts, definitions and the types of complementary pathways with their specific features. The first part also provides guidance on establishing eligibility for complementary pathways and gives suggestions of how this can be achieved. Protection considerations and key principles that need to be mainstreamed in complementary pathways programming and implementation to maximize protection outcomes are also featured in part I.

Part II of the Guidelines focuses on UNHCR's engagement in complementary pathways. It spells out four concrete pillars of such engagement: (1) data; (2) partnerships; (3) advocacy for changes in policy and legal frameworks; (4) policy development and capacity building. It provides useful tools for planning specific activities and ensuring protection considerations are upheld within complementary pathways design and implementation. Suggestions around specific roles of UNHCR personnel in diverse functions form a part of this section, along with considerations around ensuring integrity of the procedures, fundraising tips and communication lines.

The Guidelines also include **a set of annexes** that complement the content of the two parts and provide further support for the operationalization of the Guidelines.

As the world of complementary pathways is continuously changing, UNHCR's role is expected to evolve over time. Colleagues are encouraged to consult with this <u>website</u> for further updates and developments.

EXECUTIVE SUMMARY

Refugees globally face many challenges, and are in need of international protection, which limits their access to education and meaningful employment, and often means they lack documents, face financial constraints and other barriers. However, they bring forward incredible resilience and desire to succeed using their skills and capabilities.

Complementary pathways open up opportunities for refugees to use their skills, background, experience and credentials; to build their futures through work, study and family reunification in countries other than their first country of asylum; to be selected based on their skills and aspirations; and to be able to build a future from the education or work opportunity they are qualified for in another country.

To scale complementary pathways, it is important for existing migration systems to be adapted and take into consideration the need to protect refugees from refoulement. Legal and policy amendments considered under the Guidelines aim to enable refugees to navigate those systems independently without having to give up their international protection needs, and to take up international opportunities to work, study or reunite with family.

For this vision to become a reality, a multi-partner approach is essential. Hosting and receiving States, the private sector, refugee-led and diaspora groups, the academia, employers, development actors and other key stakeholders all have a role to play in empowering more refugees to access international opportunities.

UNHCR is part of this ecosystem of actors, helping bring them all together. Our work around complementary pathways focuses on four pillars of engagement: understanding populations and collecting data; building coalitions and partnerships; advocating for law and policy changes; and developing policy and building capacity.

These Operational Guidelines provide UNHCR personnel in a diversity of relevant functions, such as protection, solutions, livelihoods, private sector partnerships, education, programme, development, with a blueprint to start or expand their engagement in complementary pathways.

Our vision is a world in which refugees can safely and independently navigate migration systems that take into account their specific protection needs, and where refugees are empowered to thrive and take up opportunities everywhere on an equal basis with others. This Guidance reaffirms UNHCR's commitment to making this vision a reality by working with partners towards expanding complementary pathways that factor in refugee protection needs.

Ruvendrini Menikdiwela

Assistant High Commissioner for Protection, UNHCR

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(All Annexes are available in the Complementary Pathways Community of Practice).



John, Magaret and Nyuok at the Kakuma airstrip ahead of their departure to Türkiye on undergraduate and postgraduate scholarships. © UNHCR/Charity Nzomo

Refugees should have the opportunity to access safe and regular migration options—just like anybody else. Making these opportunities more available and systemic is fundamentally what complementary pathways are about.

PURPOSE

These Operational Guidelines outline UNHCR's operational approach in relation to complementary pathways for admission of refugees (hereafter used interchangeably with "persons in need of international protection") to third countries and provide an operational framework to inform UNHCR's engagement at field, country, regional and headquarters (HQ) levels. They build on existing policy documents relevant to complementary pathways, including the <u>Global Compact on Refugees</u>, the <u>Global Compact for Safe, Orderly and Regular Migration</u>, the <u>UNHCR Strategic Directions 2022-2026</u>, and the Third Country Solutions for Refugees: Roadmap 2030.

They should be read in conjunction with <u>UNHCR's Operational Guidelines on Facilitating Family</u> Reunification for Persons in Need of International Protection.

SCOPE

These Guidelines are limited in scope to complementary pathways for persons in need of international protection. While family reunification is also part and parcel of complementary pathways, family life is a human right and the attainment of family unity is closely aligned to UNHCR's mandate. UNHCR's engagement in family reunification-related work is included in the current Guidelines as far as family reunification falls under the umbrella of complementary pathways. It is covered, though, in more detail in UNHCR's Operational Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

As the world of complementary pathways is constantly changing, UNHCR's roles in this ecosystem may also evolve over time. Therefore, colleagues are encouraged to regularly check this website for updates and developments.

These Guidelines are primarily aimed at UNHCR personnel working in protection, solutions, registration, education, livelihoods, information management and external engagement functions as well as others engaged in protection delivery. **This guidance is non-mandatory**.

3. RATIONALE

Through the development of practical tools and guidance, this document seeks to standardize and harmonize UNHCR's practices and ways of working in countries of destination and departure. In doing so, UNHCR's global commitments to advancing the inclusion of refugees in the global market of opportunities are strengthened. This guidance is designed to clarify UNHCR's roles and responsibilities in complementary pathways.

Complementary pathways are a vital part of UNHCR's protection work and strategy. UNHCR may play a more significant role during the initial stages of building systems that link up various service

A person is in need of international protection when they are outside their own country and unable to return home because they would be at risk there, and their country is unable or unwilling to protect them. The term is not a legal term of art and is used to encompass in addition to refugees, beneficiaries of complementary forms of protection and stay arrangements, and people otherwise in need of international protection. They are similarly situated to refugees and often have equally serious international protection needs, which warrant extending them the same protections, rights and access to solutions as refugees. Any difference in treatment must be objectively and reasonably justifiable so as not to be discriminatory. See UNHCR, Persons in need of international protection, June 2017, www.refworld.org/policy/legalguidance/unhcr/2017/en/121440.

providers, governments, private sector and many other actors that have a role in ensuring the smooth functioning of pathways for refugees. The long-term vision of equal access to migration pathways for refugees relies on partners—with UNHCR maintaining a monitoring, advisory and coordinating role, streamlined under the existing resource framework.

4. UNHCR'S VISION

UNHCR's long-term vision is a world in which refugees can make informed choices about their migration options and enjoy the freedom of movement to do so. In this world, refugees, have access to documentation and rights, and can independently navigate migration frameworks which can maintain their own purposes while being adjustable to the specific needs of refugees.

To get there, UNHCR advocates that the laws and policies governing migration are adapted to be more inclusive of refugees in order to permit their full, unhindered and independent access. UNHCR supports initial project work, driven by the need to diagnose hurdles, formulate solutions and develop partnerships.

The short-term vision involves supporting the growth of partnership networks and systems to broaden access to opportunities by creating linkages between departure and destination countries with appropriate regulatory systems, while advocating for the removal of obstacles over time. As the necessary partnerships are being put into place, UNHCR plays a coordinating and capacity-building role focusing on ensuring protection, mobilizing support, acting as a bridge between partners, and promoting the inclusion of refugees in a globalized world.

5. LEGAL FOUNDATION

As a subsidiary organ of the United Nations General Assembly, UNHCR is entrusted with the mandate to provide international protection and, together with governments, seek permanent solutions for refugees,² which complementary pathways can contribute or lead to. The Statute confers responsibility on UNHCR to promote the admission of refugees to the territories of States, promote accession to and supervise the application of international conventions for the protection of refugees,³ including but not limited to the 1951 Convention relating to the Status of Refugees and its 1967 Protocol⁴ ("the 1951 Convention"). The 1951 Convention sets out the rights of refugees and obliges State parties to cooperate with UNHCR in the exercise of its mandate and provide the organization with information and statistical data.⁵

The legal basis for States facilitating refugees' access to complementary pathways is rooted in several provisions of the 1951 Convention and regional refugee law instruments.

Notably these include:

² UN General Assembly, Statute of the Office of the United Nations High Commissioner for Refugees (the Statute), 14 December 1950, A/RES/428(V), para. 1, www.refworld.org/docid/3ae6b3628.html. Refugees are broadly understood to include all persons outside their countries of origin who are in need of international protection because of a serious threat to their life, physical integrity or freedom in their country of origin as a result of persecution, armed conflict, violence or serious public disorder. See UNHCR, Persons in need of international protection, June 2017, fn. 6, https://www.refworld.org/policy/legalguidance/unhcr/2017/en/121440.

³ Ibid, para. 8(a) and 8(d). In addition, para. 9 of the Statute is relevant in that it directs UNHCR to engage in activities aimed at finding solutions for refugees as the UNGA may determine.

⁴ UN General Assembly, Convention Relating to the Status of Refugees, 28 July 1951, United Nations Treaty Series, No. 2545, vol. 189 www.unhcr.org/refworld/docid/3be01b964.html. UN General Assembly, Protocol Relating to the Status of Refugees, United Nations, Treaty Series, vol. 606, p. 267, 31 January 1967, www.refworld.org/legal/agreements/unga/1967/en/41400.

⁵ Ibid., Article 35 and Article II of the 1967 Protocol.

- Article 28 of the 1951 Convention and Article 6 of the 1969 OAU Convention Governing
 the Specific Aspects of Refugee Problems in Africa (OAU Convention) requiring States to
 issue travel documents to refugees lawfully staying in their territory and recognize/accept such
 documents:
- Article 27 of the 1951 Convention requiring States to issue identity documents to any refugee
 in their territory, which is essential to fulfil the administrative requirements of complementary
 pathways;
- Article 25 of the 1951 Convention requiring State parties to provide administrative assistance
 where the exercise of a right would normally require the assistance of authorities of a country
 that an individual cannot contact due to international protection concerns. Such assistance may
 include delivering documentation as well as providing and recognizing documents in lieu of the
 original document issued by the authorities of the country of origin.
- Articles 17, 18, 19 and 24 of the 1951 Convention providing for the right to decent work.
 Accessing (self-)employment opportunities and social security services is crucial for persons in need of international protection to build their skills. Similarly, accessing public education including by the recognition of certificates, diplomas and degrees, as provided for under Article 22, is essential for qualifying for education or employment pathways.
- Article 26 of the 1951 Convention providing refugees lawfully the right to choose their place
 of residence in the territory of a State party with freedom of movement within the territory. This
 is important for individuals to be able to access education and employment opportunities to
 enhance their skills and qualifications and to access the administrative and financial services in
 order to fulfil complementary pathways requirements.

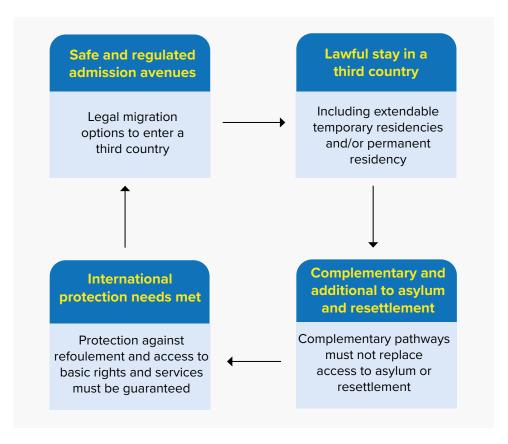
Other rights provided for in the 1951 Convention, regional refugee law instruments and human rights law may also facilitate access to complementary pathways, paving the way for refugees to find a durable solution. Importantly, persons in need of international protection who move through complementary pathways to another country enjoy all rights and duties provided for under the 1951 Convention, regional refugee law instruments and human rights law in the country of destination.

In the Third Country Solutions for Refugees: Roadmap 2030 ("Roadmap 2030") the global community set a target of at least 2.1 million refugees successfully accessing complementary pathways by 2030. This follows from the Global Compact on Refugees (GCR) which emphasizes the need to make pathways available to refugees on a more systematic basis. UNHCR's Strategic Directions 2022-2026 also affirm the need to expand, pursue and adapt complementary pathways.

The UNHCR Executive Committee Conclusion No. 117 on Durable Solutions and Complementary Pathways adopted in 2024 is the first conclusion to comprehensively address complementary pathways, and highlight their essential role as a facilitator of solutions. It reaffirms key principles of international refugee law and human rights, and can support UNHCR advocacy on these issues. Despite their non-binding nature, ExCom Conclusions are widely recognized as a source of "soft law" that can inform the implementation of legal obligations. This ExCom Conclusion contains a number of important and positive affirmations by States and can be referred to as clear evidence of political will at the international level by States to promote access to solutions to displacement.

DEFINITIONS

COMPLEMENTARY PATHWAYS | Migration pathways with refugee-specific flexibilities built in that allow refugees and others in need of international protection to access work, study and other opportunities outside of their country of asylum, while their international protection needs are respected. Complementary pathways can also take the shape of programmes created specifically for refugees and others in need of international protection to access opportunities internationally outside of UNHCR-assisted resettlement.



I Figure 1: Key attributes of complementary pathways

Complementary pathways fall broadly into four categories (see <u>Annex 1</u> for key differences between complementary pathways):

- **rights-/dependency-based** (travel for family reunification of immediate or extended family members based on a right to family life and the principle of family unity);
- qualifications-/skills-based (travel for work or study, or for sport and the arts, academic research, and other pursuits);
- **needs-based** (including evacuations from high-risk areas; short stay arrangements during natural disasters, etc.); and
- **sponsorship-based** (when extended family members, communities and others in destination countries identify and support visa applications and then offer settlement support).

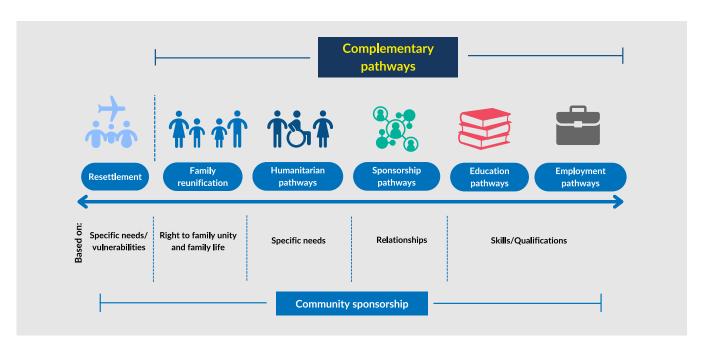
PERSON IN NEED OF INTERNATIONAL PROTECTION I Used to encompass in addition to refugees, beneficiaries of complementary forms of protection, temporary protection and stay arrangements, as well as people otherwise in need of international protection. They are similarly situated to refugees and often have equally serious international protection needs, which warrant extending them the same protections, rights and access to solutions as refugees. Any difference in treatment must be objectively and reasonably justifiable so as not to be discriminatory. UNHCR in its

<u>2017 Guidance</u> on the topic outlines that "the need for international protection arises when a person is outside their own country and unable to return home because they would be at risk there, and their country is unable or unwilling to protect them". This definition follows closely the definition under Article 1(A) of the 1951 Convention as well as the expanded definitions considered under regional refugee instruments.⁶

REFUGEE TRAVEL DOCUMENTS Identity and travel documents issued to refugees for the purposes of international travel. These documents should be <u>machine readable</u> and issued in conformity with regulations stipulated by the International Civil Aviation Organization (ICAO). They should provide protection from return to the holders' country of origin (non-refoulement), be renewable at the diplomatic representations of issuing countries abroad, carry an extended validity period of five years or more, and allow ideally for the right to return to the issuing country. The 1951 Convention Travel Document (CTD) is the most known type of refugee travel document issued in accordance with Article 28 of the 1951 Convention or Article 6 of the OAU Convention to refugees by the State where they are legally staying.

Refugee travel documents may also take other forms.⁷ These forms may include foreigner passports with special provisions; regional travel documents valid for cross-border movements within economic communities; one-way laissez-passers issued by destination States (particularly for family reunification or humanitarian pathways where permanent status and identification documentation are available upon arrival); boarding foils, etc.

As per the <u>UNHCR Executive Committee Conclusion No. 114</u> on Machine-Readable Travel Documents for Refugees and Stateless Persons (2017),⁸ States party to the 1951 Convention and the OAU Convention are under an obligation to issue a travel document to refugees lawfully staying in the country and to mutually recognize travel documents issued by other State parties. They are also encouraged to issue travel documents to other refugees in their territory with particular consideration for refugees who are unable to obtain travel documents from their country of lawful residence.



I Figure 2: The spectrum of third-country solutions

See the 1969 OAU Convention, the 1984 Cartagena Declaration, the EU Qualification Directive and other relevant instruments of the EU asylum acquis Communautaire, and the 1966 Bangkok Principles.

⁷ DIP has commissioned a study on the alternatives to CTDs for the purposes of international movement. The reference to the outcomes of the research and a relevant toolkit will be forthcoming.

⁸ Other relevant ExCom Conclusions of importance include No 13 (1978), Conclusion No 18 (XXXI) 1980, para (i), and Conclusion No 49 (XXXVIII) 1987, as well as Conclusion No 112 (LXVII) 2016 on international cooperation from a protection and solutions perspective.

7. COMPLEMENTARY PATHWAYS TYPOLOGY

7.1 Humanitarian pathways

Programmes which offer a pathway for admission to individuals in need of international protection through their identification and transfer from the first country of asylum to a third country where they can enjoy effective protection. Eligibility criteria for such programmes are decided by States, sometimes jointly with other actors in the receiving country, and are discretionary.

Humanitarian pathways are flexible, effective protection tools that can lead to durable solutions for refugees. They can be used in the early stages of emergencies as a solution for particularly vulnerable groups and as a complementary tool to other pathways such as to facilitate extended family reunification. It is important that humanitarian pathways carry the maximum protection impact possible and are designed to complement and not replace other methods of securing international protection, including access to asylum procedures, resettlement or commitments to secure durable solutions by other methods.

Eligibility is determined by each destination State but may be based on humanitarian/protection needs and vulnerability criteria in the country of asylum, or family links and other connections to the country/community of destination. Beneficiaries of these programmes may therefore be selected against broader eligibility criteria than those applicable to resettlement which may include general humanitarian needs or existing links to the receiving country.

Humanitarian pathways often follow an expedited process used to respond to situations of large-scale displacement. Admission under these programmes is often granted on a temporary basis and can be extended through an application for asylum upon arrival. Ideally, they render refugees eligible for permanent residency and nationality under the same provisions as holders of other visas.

In some situations, humanitarian pathways are used for persons in urgent need but without verified international protection needs. Such programmes can include migrants in vulnerable situations, extended family members or persons in need of medical assistance and care. Some programmes are only open to specific nationalities and countries of asylum, populations fleeing specific conflicts, people with certain identities or convictions, or individuals with family links in receiving countries.

Humanitarian admission programmes tend to vary between countries. Examples of such programmes include the <u>US Humanitarian Parole programmes</u> for specific nationalities and the <u>Humanitarian</u> Corridor Programmes in Italy.

Humanitarian visas may be used as a tool to facilitate admissions for humanitarian pathways or other complementary pathways programmes, including employment or education opportunities and family reunification. UNHCR's roles in humanitarian pathways are featured in Annex 2.

7.2 Qualifications-/skills-based pathways (education and employment)

Legal channels that permit persons in need of international protection to move to a safe third country for the purposes of employment or higher education, while also having their protection needs met. Refugee eligibility for skills-based pathways is assessed based on professional

qualifications and experience, or academic merit and relevant qualifications, provided refugees opt to apply for the opportunities at hand.

The success of individual applicants depends largely on the cross-sector collaboration which supports refugees in leveraging their skills and experience, facilitates their inclusion in national education and labour systems and improves their access to training and support in preparation for complementary pathways. Considering complementary pathways opportunities when planning economic inclusion activities and advocacy lines would further support refugees in attaining such opportunities independently. To this end, UNHCR serves as an advocate and a bridge between partners and refugees, and advocates for policy change or adaptation.

EDUCATION PATHWAYS

Access to third-country education opportunities corresponds to UNHCR's objectives set out by both Roadmap 2030 and the Education 2030 Strategy. A diverse range of actors is needed to contribute distinct areas of expertise to make education pathways effective and scalable. This can include universities, non-governmental organizations (NGOs), refugee-led and student-led organizations, civil society and faith-based organizations, refugee settlement and support services, local communities, language training providers, credentialling and testing services, country of asylum and third-country governments, and Technical and Vocational Education and Training (TVET) institutions. The Global Task Force on Third Country Education Pathways is the first port of call for information on coordination, best practices and technical support in developing and implementing education pathways.

This <u>2023 Global Refugee Forum pledging document</u> provides more information on UNHCR's key advocacy points around education pathways. UNHCR's roles in education pathways are featured in <u>Annex 3.</u>

EMPLOYMENT PATHWAYS/LABOUR MOBILITY

Like other complementary pathways, employment pathways aim to promote refugee agency and self-reliance. In many countries around the world, refugee talent can help to address labour market shortages. Essential to this process is securing the support of employers who are keen to recruit and employ appropriately skilled refugees. Ensuring that political support is strengthened and governments are adequately supported to launch and implement employment pathways remains a priority. UNHCR is a member of the Global Task Force on Refugee Labour Mobility, which works to expand labour mobility pathways globally by engaging private sector, States and non-State actors engaged in global migration and works closely with the members of other fora to ensure that opportunities are nurtured.

This <u>2023 Global Refugee Forum pledging document</u> provides more information on UNHCR's key advocacy points around employment pathways. UNHCR's roles in employment pathways are featured in Annex 3.

7.3 Family reunification

The legal, rights-based and State-provided avenues that allow refugees to access their right to family life regulated by national, regional and international law. Family reunification procedures include individuals with close and extended family relations based on the concept of dependency which ensures that family members—who may not be close family members but are nevertheless dependents—are able to enjoy the right to family life and family unity.

Family life is a human right. Respect for the right to family life and the principle of family unity requires States to refrain from conduct which would result in family separation, but also to take measures to maintain family unity and ensure the reunification of separated families. The reunification of refugee families is first and foremost the responsibility of States. A part of UNHCR's job is to support States meet their obligations under international law and uphold the principle of family unity. Even though States are the central figure in family reunification procedures, refugees navigating these systems often need the support of multiple actors in sending and receiving countries. While States often have adapted legislative frameworks to facilitate family reunification of refugees, in many cases these frameworks suffer from multiple shortcomings. When seeking to reunite, refugee families are subjected to migration system requirements such as requests for passports, documentary evidence of relationships, in-person interviews in foreign States, which do not take into consideration their international protection needs and vulnerabilities.

For extensive guidance on UNHCR's roles in family reunification, consult <u>UNHCR's Operational</u> Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

7.4 Sponsorship pathways

Programmes in which private individuals, entities or organizations (nomination sponsors) directly engage in admission efforts by identifying, selecting and supporting the entry and stay of nominated individuals in need of international protection. Sponsorship can often include the provision of financial, emotional, social and/or settlement support in a third country (an integration tool which UNHCR refers to as "community sponsorship").

UNHCR's main role in sponsorship pathways is to advocate for protection safeguards, transparent selection processes, effective monitoring systems and complementarity to resettlement quotas. On the departure country's side, UNHCR also negotiates with States to ensure smooth departure, including through issuance of travel documentation and exit permits.

Sponsors are the ones identifying, selecting and supporting the entry and stay of persons in need of international protection. State authorities manage the visa process and work with sponsors to ensure the well-being of refugees and that their post-arrival needs are met. Even though sponsors lead the process, it is States that retain the ultimate responsibility over the admission decisions. States are also responsible for the protection of refugees, including by ensuring that they have access to rights and services upon arrival and that their sponsors are vetted and trained in line with pre-established criteria.

Sponsorship programmes present important opportunities to increase access to third-country solutions by leveraging public support for refugees. They engage a broad range of actors across communities and are an important tool for family reunification; while sponsors can choose whom to support, sponsored individuals often include close and/or extended family members of the sponsors (or people known to the community). UNHCR's specific roles in sponsorship pathways are featured in Annex 4.

What is the difference between sponsorship pathways and community sponsorship?

Community Sponsorship: Community sponsorship is a reception and integration tool that involves the pairing of resettled refugees or persons admitted under complementary pathways with individuals, groups of individuals or organizations (i.e. sponsors such as local clubs, businesses, university communities, faith groups, etc.). These entities commit to providing clearly defined financial and/or in-kind contributions, emotional support and volunteer services to help refugees or other persons in need of international protection upon arrival.

Sponsorship Pathways (private sponsorship or naming programmes): Sponsorship pathways (sometimes referred to as "private" or "named sponsorship") are a third-country solution that should

lead to an overall net increase in the number of persons in need of international protection admitted to receiving countries. Scenarios where communities have greater involvement, for example, in identifying beneficiaries and/or facilitating admission are sponsorship pathways. Such pathways, are likely to be accompanied by the expectation that sponsors will take on settlement support upon arrival.

Information is also available through the Global Refugee Sponsorship Initiative (GRSI).



Yohannes, an Ethiopian refugee evacuated from Sudan, is reunited with his mother and welcomed by his step-grandmother at Brussels airport, Belgium.

© UNHCR/ Olivier van Naemen

8. WHO CAN ACCESS COMPLEMENTARY PATHWAYS?

It is important to recall that any person in need of international protection should be protected from refoulement at any moment in time. In the context of complementary pathways this means that those travelling on such opportunities cannot be asked to give up their protection status at any point and must remain protected from refoulement throughout their pathways journey.

To qualify for various types of complementary pathways, refugees need to show **skills**, **experience**, **language capacity or have family members in other countries**. They also are often required by States and other partners to provide proof of their international protection needs, relied upon by these parties to justify applying concessions for refugee inclusion in pathways programmes. Documents confirming an individual's recognition as a refugee by a national asylum authority or UNHCR could serve as a proof of eligibility for complementary pathways concessions. This can include documents such as a **UNHCR-/State-issued card or certificate that indicates refugee status**, **or a documentation or card issued by a State indicating complementary or temporary protection status**.

While many refugees hold such refugee documentation, there are many individuals with international protection needs who may not have access to asylum procedures or may not be able to have their international protection needs recognized in a timely manner. This particularly applies to those residing in States without an asylum framework or asylum procedures, or in States with asylum procedures facing processing delays. Additionally, persons in need of international protection may not need to rely on the asylum procedures in place as they are allowed legal stay through other types of statuses that are available and more accessible to them (e.g. temporary protection or other regularization procedures/migration status).

Given this consideration, UNHCR advocates for a broader approach to eligibility confirmation for complementary pathways that is not exclusively linked to refugee status determination.

Alternatives may include asylum-seeker documentation or proof of registration for asylum with a national asylum authority or UNHCR for nationalities with high recognition rates, as per UNHCR country guidance (e.g. international protection considerations or guidance notes) or as per recognition rates in the receiving State, region or globally.

If none of the above options are feasible in a particular context, modalities could be explored whereby the receiving State confirms eligibility for refugee status according to their refugee legislation.

In contexts where there is no fair and efficient national asylum system in place, UNHCR may conduct refugee status determination (RSD) under its mandate where it is the most effective intervention to promote protection and solutions. Such RSD is at times required by programme providers for the purposes of eligibility (e.g. Canadian sponsorship through the Group of Five programme).

The use of mandate RSD should only apply after an analysis of whether it is the most appropriate protection intervention, in consultation with the Regional Bureaux and the Division of International Protection. This analysis can take into account the following considerations:

- the operational context;
- the likelihood that the complementary pathway departure will materialize in the short to medium term;
- the scale of the mandate RSD that would have to be conducted; and
- the availability of other complementary pathways that could provide quicker solutions to refugees

(e.g. through work, study or family opportunities) where RSD would not be necessary.

When considering whether to embark upon large-scale mandate RSD, the following considerations can be taken into account:

- the length of the procedure before departure on the complementary pathways programme requiring RSD;
- the population readiness to compete for other opportunities, including work or study pathways;
- the population needs in accessing family reunification;
- the availability and feasibility of humanitarian admission programmes either in place or potentially available;
- the availability of infrastructure to support individual refugees accessing various complementary pathways and identified needs to enhance the support structure;
- the potential dividends of having a support structure in place in the long-term that could assist refugees accessing complementary pathways options.



Jordan. Ziad, a Syrian refugee, seeking carpentry job in a third country through UNHCR partner. © UNHCR/ Nisrine Benyahia

PROTECTION CONSIDERATIONS AND 9. **KEY PRINCIPLES**

Mainstreaming the principles below, listed in no particular order of importance, will allow to maximize the protection impact of complementary pathways.



AGENCY AND SELF-RELIANCE

Complementary pathways serve the objective of enhancing refugee self-reliance and helping refugees attain a durable solution in the future. This is particularly the case for education and employment opportunities that can also be beneficial for third countries by helping to address labour or skills shortages and build public support for refugees by demonstrating their positive contributions to receiving societies. While these pathways may initially provide refugees with temporary stay arrangements, they could be part of a progressive approach to solutions. By harnessing refugees' capacities and providing them with opportunities to learn new skills, acquire more knowledge and showcase their talents, these pathways make refugees better able to contribute to their own future solutions. The work around complementary pathways, therefore, focuses on establishing systems and mechanisms that are sufficiently flexible and accessible so that persons in need of international protection can use them independently and without intermediaries. That, in turn, may enable them to make decisions and utilize their skills and knowledge to shape their future.



PROTECTION AGAINST REFOULEMENT

Systems and procedures need to be put in place by the destination and departure States to guarantee protection from refoulement for refugees accessing complementary pathways.

Clear ways of preserving this protection are:

- a) Access to multi-trip machine readable refugee travel documents—and the ability to renew them at the embassies of issuing countries: Refugees participating in work, education or other temporary opportunities should, in principle, have the right to re-enter the first country of asylum where they are protected from refoulement and enjoy the same rights and status that they had prior to departure; and
- b) Meaningful access to asylum in receiving countries without time limits: When refugees are unable to return to their first country of asylum and have not managed to secure their stay through legal means in their complementary pathways country, they need to be able to seek asylum that protects them from refoulement and allows them to remain in the third country as long as they are in need of international protection.

Refugees must not be required to return to or contact their country of origin as part of a process to access complementary pathways, extend their stay in a third country or for any other reasons.



PROGRESSIVE APPROACH TO SOLUTIONS

A solution is achieved when a durable legal status is obtained which ensures national protection for civil, cultural, economic, political and social rights. While solutions-oriented, complementary pathways do not always lead refugees directly to a solution. They also may vary by country, eligibility, processes, duration, access to residency and solution outcomes. In some cases, a refugee may choose to relocate for study to one country and then move to a different one for another opportunity through a legal pathway with a temporary legal status (work or study permit) before becoming eligible for permanent residency and eventually citizenship— thus allowing them to cease their refugee status. In others, the work, study and even family reunification or sponsorship opportunity may allow the refugee and their family to continue with their lives in relative peace while awaiting return to their home country and the chance to contribute to the rebuilding effort using the skills and savings gained while in exile. Refugees who arrive in third countries on legal pathways with a temporary legal status linked to employment or education often must navigate steps towards permanent residence and naturalization to extend their stay. This, for example, may mean that refugees are able to acquire a temporary work-related residence upon completion of a study course and subsequently access permanent residence following the required length of stay, on the same basis as other individuals migrating to other countries for such opportunities.



ADDITIONALITY TO ASYLUM AND RESETTLEMENT

Complementary pathways should not substitute the protection afforded to refugees under the international protection regime in terms of access to international protection through asylum procedures, and they should not serve to diminish resettlement programmes. The right to seek asylum is a fundamental human right for which complementary pathways cannot substitute. By definition, complementary pathways are accessible on the basis of skills and experience, family and community links and other factors. In contrast, resettlement offers a solution in another country to those with acute protection needs that cannot be addressed in their countries of asylum. Complementary pathways should lead to an overall net increase in the number of people accessing third-country solutions without jeopardizing or replacing resettlement quotas that offer solutions based on protection needs and specific vulnerabilities.



FAMILY UNITY

Preserving family unity should be at the core of the design for all complementary pathways, ideally by ensuring that family members can travel together or are able to reunite without delays through family reunification procedures with refugee-specific concessions built into them. This applies to situations of longer-term relocation or permanent settlement through complementary pathways. Access to fast and effective refugee-specific family reunification is one of the flexibilities that could be considered when designing complementary pathways to prevent family separation over extended periods of time. For shorter-term opportunities, the same rules that apply to work/student migrants should apply to refugees travelling on such opportunities.



NON-DISCRIMINATION

Complementary pathways are based on the premise that refugees should have equal access to the opportunities offered by regular migration, without discrimination on the basis of their status as refugees. It is equally important that complementary pathways are non-discriminatory and accessible without distinction of any kind such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Pathways should be based on objective criteria, taking into consideration the specific situation of the refugees concerned, such as gaps in education or work experience, lack of available certification of skills and previous qualifications, and/or medical or psychological needs as well as the overall protection context in the country of asylum. Ensuring equal access and opportunities for all refugees should inform the expansion of complementary pathways. For example, barriers may obstruct access to complementary pathways for women, people of diverse sexual orientation, gender identity, gender expression and/or sex characteristics (SOGIESC), ethnic and religious minorities, gender-based-violence survivors, people living with disabilities and other potentially marginalized groups. All complementary pathways should prioritize equity and

protection. In programme design, this can mean introducing specific quotas for women and others; adjusting eligibility criteria to promote greater parity among successful candidates; and working at community level to challenge gender norms and obstacles relevant to specific individuals and groups.



PROTECTION FROM EXPLOITATION, AND ACCESS TO RIGHTS, SERVICES AND JUSTICE

Countries of destination are obliged to provide **minimum standards of treatment for refugees**. These minimum standards draw from key international conventions and cover a range of categories including access to protection, personal status and legal documentation, education, work rights, social security and public relief, health, housing, freedom of movement, religion and access to the courts. Refugees travelling on complementary pathways also require access to justice, including fair hiring and employment practices, occupational health and safety, freedom from discrimination, exploitations or other risks associated with third-country mobility, irrespective of their legal status. In this regard, the International Labour Organization (ILO)'s <u>Guiding principles on the access of refugees and other forcibly displaced persons to the labour market and the UNHCR Guidelines on International Legal Standards Relating to Decent work for Refugees are key references. Essential services such as health, insurance, education, legal aid/assistance, housing, financial services, counselling and psychosocial services, and language support are also important. Providing initial targeted support upon arrival in the third country and adequate social and legal support until a longer-term option or durable solution is found needs to be considered.</u>



BEST INTERESTS OF THE CHILD

Complementary pathways must be child-sensitive and incorporate appropriate child-focused protection safeguards. They should be grounded on the principle of the **best interests of the child** and on the protection and fulfilment of the rights of the child.⁹



PROTECTING PERSONAL DATA

At each stage of the process and especially when handling sensitive information, UNHCR, governments and other actors need to understand their legal obligations (as data controllers) vis-à-vis individual data subjects and be aware of potential risks. This includes obtaining consent and informing individuals, knowing how data should be safely stored and transferred, how long it needs to be retained and when personal information should be deleted, and having in place organizational and technical measures of data and information security (e.g. encryption). Such a "privacy by design and by default" approach ensures that data is processed safely and contributes to successful programming. All personal data processing by UNHCR needs to comply with applicable data protection rules, mainly UNHCR's General Policy on Personal Data Protection and Privacy (GDPP) and implementing instruments. Data-sharing agreements between departure and destination States and, where applicable, UNHCR should be set in place when UNHCR is requested to share individual data, owned by the country of first asylum (in situations of government registration and asylum procedures for status issuance).



INCLUSION OF REFUGEES' PERSPECTIVES IN DESIGN, MONITORING AND EVALUATION OF PROGRAMMES

The integration of refugees' perspectives in the design and implementation of complementary

⁹ UNHCR, 2021 UNHCR Best Interests Procedure Guidelines: Assessing and Determining the Best Interests of the Child, May 2021, www.refworld.org/policy/opguidance/unhcr/2021/en/122648.

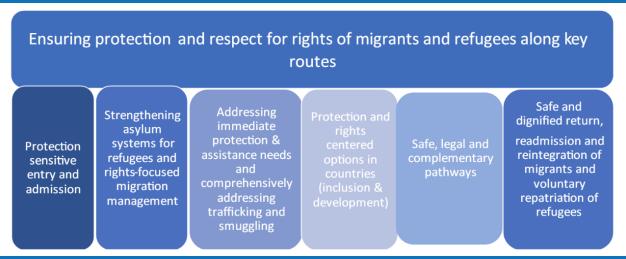
pathways is key to ensuring that their specific situation is taken into account. Regular feedback mechanisms and consultations with refugees on the barriers that may prevent uptake and on the ways to improve structures can ensure that pathways are appropriate, safe, scalable and accessible for refugees.

Complementary pathways and the Route-Based Approach

UNHCR's shift towards an operational <u>Route-Based Approach</u> (RBA) that plans around and responds to the entirety of a refugee's journey focuses on reception, asylum systems, inclusion, development action, return and complementary pathways.

There is wide recognition that work opportunities and family unity imperatives drive much irregular movement—including onward movement from countries of first asylum. Greater access to complementary pathways and family reunification may serve to mitigate irregular and unsafe movement, thus helping refugees to avoid traffickers and other risks along the route.

As such, supporting and lifting obstacles to the use of complementary pathways at the origins of and along mixed migration routes is one of UNHCR's key protection priorities.



I Figure 3: Pillars of UNHCR's Route-Based approach

10. UNHCR'S ROLE AND ENGAGEMENT IN COMPLEMENTARY PATHWAYS



I Figure 4: Pillars of UNHCR's engagement in complementary pathways

As explained in chapter 4, UNHCR's long-term vision is a world in which persons in need of international protection can make informed choices about their migration options, enjoy freedom of movement and are able to navigate migration frameworks that are cognizant of refugee-specific limitations (with relevant support services available, if needed). These longer-term goals are focused on amending migration systems and frameworks to allow for refugee inclusion through linking development, training, certification, entry rules and systems, support frameworks and integration structures together.

UNHCR's role in this space lies in **ensuring that persons in need of international protection are** included in national and international systems, their international protection and other needs are taken into account, and the institutions that serve them both understand those needs and are equipped to address them in the context of cross-border legal pathways.

As an advocate for refugee inclusion and as per its Global Livelihoods and Economic Inclusion Strategy (forthcoming), UNHCR plays a pivotal role in **providing policy and legal analysis of refugees' access to opportunities, facilitating the collection of socio-economic data to enrich demographic profiles and utilizing evidence-based information to advocate for inclusive solutions.** In contexts where livelihood and economic inclusion interventions are already under way, a facilitation and advocacy role—avoiding the creation of parallel systems—may be most suitable for UNHCR.

In some operational contexts, local service providers, including but not limited to civil society organizations, NGOs, refugee-led organizations, do not have the resources (e.g. skills, knowledge, training, funding, staffing) to work on complementary pathways. UNHCR may step in to fill the gaps and, consequently, play a temporary capacity-building role, support with fundraising efforts, strategy building and link local initiatives with existing development and migration initiatives and with international partners involved in sourcing refugees for specific pathways opportunities.

UNHCR's engagement in complementary pathways organizes around the following four pillars. When deciding the exact type of engagement, UNHCR Operations should consider an analysis of the local protection and solutions context, the availability of partnerships and access to development initiatives, among other things.

PILLAR I: UNDERSTANDING POPULATIONS AND COLLECTING DATA

More systematic data collection is essential to building complementary pathways for refugees. Collecting pathways-related data allows project partners to plan and design pathways and interventions, assess the protection impacts of complementary pathways programmes, extract lessons learned and ensure evidence-based programming in the future for more effective outcomes. Data and evidence are also essential in monitoring progress against UNHCR's commitments under the GCR and the objectives set in Roadmap 2030.

A) Know the population and build profiling data

Collecting information about the refugee population is an essential first step in planning for pathways at both the departure and destination sides. In the first countries of asylum capturing up-to-date individual information (including education and work experience, family links in third countries, languages spoken, specific needs and other data points relevant to complementary pathways) through the self-service tools of UNHCR and partners and through proGres enables UNHCR Operations to assess the viability of different pathways in their context and plan accordingly. Such data-collection efforts could be embedded within the larger population skills mapping undertaken by migration and development agencies and other actors for sourcing individuals for specific work opportunities abroad.

The current development and forthcoming launch of the <u>UNHCR Digital Gateway</u> will empower refugees to own their data and update it in real time. It will also enable UNHCR and its partners to have more up-to-date and comprehensive information on the population's skills, capacities, experiences, etc.

While the Digital Gateway remains in development and in locations where it will not be readily accessible, verification exercises, participatory assessments, community fora and individual counselling sessions provide opportunities to collect relevant population data, including family links in third countries, skills, languages and education levels. Self-service modalities [such as kiosks, my unhcr.org scheduling tools, Safe Mobility Offices (SMOs) and other tools that will form a part of the upcoming Digital Gateway] should include specific fields to improve the ability of refugees to record, access and update their information.

The quality of UNHCR's operational data may also be improved through the deployment of supplementary tools like KoBo forms to capture additional knowledge of the refugee population concerning skills, languages and family linkages. Understanding the data landscape outside of UNHCR can also support in this.

Once the skills, capacities, needs and relevant gaps of the population are better understood through regular data collection, specific interventions in upskilling, certification, referrals to relevant service providers and support for skills-based or rights-based pathways referrals can be incorporated in regular livelihoods, education and protection programming and service delivery.

Similarly, at destination States, data on profiles and needs of the population in the departure countries could instruct specific programme design, including the need and availability of training, the relevance of pre-existing migration agreements and frameworks for refugee inclusion, integration support upon

arrival, etc.

While UNHCR data on the population remains useful, partners working with communities, and particularly refugee-led organizations and diaspora groups, often have information background of individuals or could include routine questions to capture this data in interactions and outreach. Datasharing agreements (DSAs) can also improve efficiency by streamlining information-sharing between UNHCR and partners. In situations where States, UNHCR and other partners maintain parallel data-collection systems to enable wider access to mobility pathways, UNHCR may wish to work with the relevant actors to ensure that those feed into national migration systems through innovative tools such as SMOs and similar initiatives.

The collection of data to better understand the population profiles could also include assessment of reasons for onward movement that could form the programmatic response under Pillar V (Safe, regular and complementary pathways) of UNHCR's Route-Based Approach. Refugees often move onwards due to lack of options for work or study and perceived eligibility for family reunification, among other reasons. UNHCR needs to be consistent in understanding the reasons for this movement and identify partners along the route who are actively involved in building a comprehensive response to the root causes as they relate to economic or education opportunities, family reunification or protection needs particularly in the context of complementary pathways.

B) Empower refugee self-ownership of data (Digital Gateway self-reporting)

Refugees should be able to continuously access, verify and update their personal information to galvanize opportunities around complementary pathways—and these modalities should centre around the principle of individual data ownership. UNHCR is enabling these opportunities through the progressive development of self-service modalities that allow for continuous recording of data and for its individual ownership. The development and launch of the Digital Gateway will be an important breakthrough in providing data ownership to refugees. The VerifyPlus feature embedded in the registration attestations potentially also available through the Digital Gateway that will issue QR-coded certification on registration/legal status will also service to enhance integrity within complementary pathways processing.

C) Record complementary pathways assistance

UNHCR's role in building the overall evidence base extends to ensuring that operational data is as reflective as possible of complementary pathways departures from countries of first asylum. This includes steps on the way to departure such as any forms of assistance, counselling, referrals, travel support, assistance with visa issuance or exit formalities. The UNHCR Operational Guidance Note — Complementary Pathways for Admission to Third Countries, Data Recording in proGres explains these procedures and should be socialized across all UNHCR field functions.

D) Data collection and sharing

The work of complementary pathways requires efficient multi-stakeholder coordination, including information and data-sharing. Coordination between partners avoids duplication of data and is important for ensuring that partner data is triangulated with proGres and other sources of information. Before sharing personal data with third parties, UNHCR should assess related risks and generally whether the level of data protection afforded by third parties with whom personal data is shared is adequate (para. 44 GDPP). Prior data-sharing agreements between partners may be necessary, particularly where transfers of personal data are likely to be large, repeated or structural. Agreements also allow to specify data transfer modalities, limitations to onward sharing, mutual breach notification and the question of limited data retention.

E) Monitoring and evaluation

It is essential to collect and assess information pertaining to the long-term protection outcomes of complementary pathways, including whether individuals can access durable solutions, through monitoring and evaluation frameworks. UNHCR is equally invested in ensuring parity of access, especially in terms of age, gender and diversity factors among individuals departing on pathways. The development and improvement of monitoring systems together with refugees and other partners (including State authorities) in destination countries will help enhance the global understanding of how these programmes contribute to third-country solutions and respond effectively to the protection needs of refugees, while benefitting the communities and States welcoming refugees.

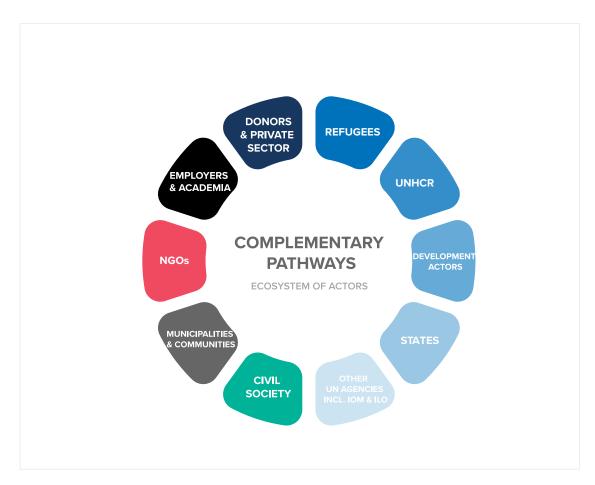
Work on the comprehensive framework for programme evaluation is only commencing. However, UNHCR's <u>participatory assessment framework</u> may provide a useful tool when considering assessment of existing initiatives and using the outcomes of such assessment to improve programme implementation.

PILLAR II: BUILDING PARTNERSHIPS AND COALITIONS

For complementary pathways to scale, UNHCR relies on the knowledge and experience of its partners such as refugees and their communities, States, IOM and other migration agencies, development banks, local partners, civil society, private sector entities and others.

UNHCR is part of this ecosystem of actors and often catalyses action around pathways-related work, while learning from all other stakeholders. In particular, UNHCR:

- Galvanizes local inclusion and migration support initiatives: UNHCR works closely with
 various development partners to ensure that refugees are included alongside their host
 communities in education, livelihoods and economic inclusion initiatives in the countries of
 first asylum. Destination States often have agreements with one or multiple States on support
 with accessing the labour market in sectors with significant labour shortages. The inclusion
 of refugees in such initiatives enhances their ability to compete for labour or education
 complementary pathways opportunities as well as leads to scale in skills-based complementary
 pathways.
- Supports with accessing opportunities: UNHCR's longer-term vision relies on sustained efforts to identify and strengthen local partnerships in the first countries of asylum and on the gradual strengthening of skills among appropriate actors to support refugees' access to pathways. At the start of this journey, UNHCR personnel, particularly in the first countries of asylum, are heavily involved in partner identification, capacity building, the development of advocacy strategies for law and policy change, and the creation of linkages with development and migration training initiatives. Once fully functional, these sourcing/support mechanisms are expected to work independently by drawing in local actors who are fully trained to provide the necessary support and preparation for refugees considering departing on pathways, while UNHCR retains a coordination role.
- Builds in protection safeguards: Partners offering opportunities in the destination States
 define their own eligibility and selection requirements around complementary pathways and
 fulfil pivotal roles in programme design, candidate identification, selection, transfer, entry and
 post-arrival support. UNHCR focuses on ensuring protection safeguards and, consequently,
 coordinates the engagement of various actors to ensure pathways are available to refugees,
 sustainable and protection-driven.



I Figure 5: Ecosystem of actors in complementary pathways

Some examples of partners in complementary pathways may include:

DESTINATION STATES

Often different departments/ministries are in charge of separate components of migration, refugee admission and development work. Achieving complementary pathways outcomes requires enhanced coordination between various government bodies to ensure that the necessary flexibilities are built into the frameworks to enable access to training, support and eventual admission through complementary pathways.

COUNTRIES OF FIRST ASYLUM

State authorities in the country of registration/first country of asylum are essential in ensuring complementary pathways are accessible. They often manage asylum registration, issue travel documents, exit permits, and have alternative methods for credential (skills and education) and relationship (family reunification) certification. They can also help ensure refugee protection throughout the complementary pathway journey by issuing protection-centred refugee travel documents and by providing the possibility for refugees to return upon completion of a contract or a study opportunity elsewhere. Large hosting States can work closely with UNHCR on the inclusion of refugees in local education, livelihoods and social protection systems, and, as such, are essential in complementary pathways preparedness.

DEVELOPMENT ACTORS

These are entities that are engaged in the local development and support of the biggest hosting countries and that invest significantly in refugee inclusion. This includes enhancing access to registration and documentation, ensuring equal opportunities for education and certification, and facilitating refugees' access to the labour market. These actors also work to build the capacity of local governments to provide services to their population. The inclusion of refugees in these services is the ultimate point of connection between UNHCR and development actors. Linking up this work with

opportunities for third-country solutions through enhanced training, inclusion of refugees in education and training opportunities, access to documentation, information provision on opportunities abroad, and travel support is essential in building complementary pathways and empowering refugees to travel on those.

IOM

IOM has specific experience in migration facilitation and is the global lead on migration law and policy, an important complement to UNHCR's global leadership role on refugee law and policy. It has been running skilling-to-hire programmes for many States that build the capacity of the local population and their skills against known work opportunities in the destination States. Ensuring that refugees are included in these infrastructural frameworks would be a major gain in attaining scale on complementary pathways. It may also be valuable to explore how the role of IOM could be expanded to include providing migration assistance to refugees in the context of enabling family reunification and offering skilling and migration support to those travelling on skills-based and/or humanitarian pathways.

REFUGEE-LED AND DIASPORA GROUPS

Refugee-led and diaspora groups can disseminate accurate information, signpost to legal and administrative service providers, and assist with some of the administrative and migration-related components. Refugee-led organizations and diaspora groups may require additional fundraising and skills enhancement support. However, they are often best suited to fill gaps in administrative, legal and/or context-specific practical support for admission through complementary pathways by building information provision frameworks, tailoring and delivering messages to communities, supporting with form filling, etc.

NON-PROFIT/CIVIL SOCIETY/LEGAL SUPPORT PROVIDERS

Legal services providers, such as national and international legal organizations (e.g. IRAP) provide specific assistance and counselling to refugees free of charge on family reunification procedures. Many, such as Talent Beyond Boundaries (TBB) and local livelihoods partners, have been trained to support with sourcing against specific employment opportunities. They assist with soft skills, CV building and visa applications, conduct legal research to inform advocacy, build the capacity of partners to offer on-the-ground support through trainings and/or by providing oversight, and produce materials/tools on procedures and eligibility.

PRIVATE LAW FIRMS

Private law firms commit hours to representing refugee families, assist with applications, perform strategic litigation, conduct legal research to inform advocacy for family reunification and skills-based pathways admission, hire refugees on labour mobility, build the capacity of partners to provide legal support through seconding resources, trainings and/or by providing oversight, and produce accessible information materials/tools on procedures and eligibility. These services are provided on both pro bono and commercial basis. Engagement with both types of legal support through cooperation, coordination and training could be considered.

PRIVATE SECTOR (INCL. LAW FIRMS)

Private sector entities are key in opening up skills-based pathways (education and labour) as both employers and advocacy actors for government-administered flexibilities to be put in place. They could equally provide financial solutions (loans and philanthropic support, and repayable grants).

OTHER IMPLEMENTING AND OPERATIONAL PARTNERS OF UNHCR

Such entities can include complementary pathways and family reunification assistance in existing and new Project Framework Agreements (PFAs) and operational partnerships with protection/legal/community outreach.

Private sector partnerships for pathways

Private sector engagement is about identifying and working with partners who bring both financial and non-financial value to UNHCR's work around complementary pathways. Aside from funding, these partnerships play an important role in influencing attitudes and bringing wider support for refugee mobility—for example, by influencing actors like employers, companies, authorities and institutions to generate opportunities for refugees. Different models of engaging with private actors, including partnering with individual companies, developing shared value partnerships and engaging with philanthropy, can benefit work around pathways.

See <u>examples of UNHCR's best practices working with the private sector</u>, and explore the <u>Private</u> Sector Partnerships (PSP) SharePoint site.

Ensuring that the issue of refugee inclusion in migration policies and frameworks is addressed in relevant global, regional and national fora can support expanding refugee access to migration frameworks, encourage policy changes and result in more opportunities in destination States. Topic-specific discussions, where possible, also serve an important role in advancing refugee inclusion in global markets by building political will and commitment throughout the world.

<u>Annex 5</u> useful considerations for Operations to take into account when assessing partnership opportunities in the context of complementary pathways.



Abdul has come a long way from the conflict in Syria to his new life in Brazil. He is among more than 4,000 Syrian refugees welcomed by Brazil since it became the first country in the Americas to offer special humanitarian visas to those fleeing Syria in 2013. © UNHCR/Jeoffrey Guillemard

PILLAR III: ADVOCATING FOR LAW AND POLICY CHANGES

The current migration framework often remains inaccessible to refugees due to inherent obstacles and limitations on both departure and destination sides. Some of these obstacles include:

Legal challenges

- Ensuring that international protection needs are retained through the pathway;
- · Availability of legal pathways for refugees;
- Ensuring pathways are additional to asylum and resettlement;

Gaps related to skills and credentials

- Gaps in education and employment due to flight;
- Lack of access to formal employment in countries of asylum;
- Language capacity and lack of access to language training and certification;
- Lack of access to upskilling and training (soft and professional skills) to qualify;
- · Inequity of education and training systems and their incompatibility;
- Confirmation of credentials between countries.

Clear and legitimate information and legal procedures

- Lack of access to clear and legitimate information on opportunities and application processes and requirements;
- Limited understanding of employment and education systems and requirements in other countries;
- Limited understanding of procedures for movement/family reunification and subsequent integration;
- Limited understanding of rights and responsibilities during travel and upon arrival;
- Limited understanding of procedures for subsequent legalization and stay.

Documentation

- Lack of access to documents confirming relationships, credentials and qualifications;
- · Lack of identity and travel documents.

Departure requirements

- · Inability to obtain exit visas and required fees;
- Requirements for police certificates and other documents from country of nationality or current asylum.

Financial requirements

- Personal costs for processing/application/departure/flight/integration;
- Programmatic costs to universities, employers, families, etc.

Visa-specific requirements

- · Lack of access to bank accounts and financial history;
- Need to provide proof of intention/ability to return to country of origin/current stay;
- Requirement of national passports or other forms of valid travel documents.

Integration and subsequent legalization upon travel

- Needed support in case of employment/education contract end;
- Lack of a clear pathway for regularization or return to first country of asylum, if desired;
- Lack of support with necessary procedural steps upon arrival for legalization and subsequent stay arrangements.

Hence, an analysis of legal frameworks evaluating existing various visa requirements, ways these limit refugee access to pathways and limitations in countries of first asylum (such as exit permits) is essential. UNHCR Rights Mapping and Analysis Platform (RiMAP) provides means to evaluate some of

the relevant components and limitations and come up with policy and advocacy messages to influence authorities in making the necessary systemic changes to facilitate accessibility and availability of complementary pathways. Partnerships with migration agencies, legal providers and migration experts to undertake the analysis and come up with options best suited for refugees and the facilitation measures required are essential in this area.

The analysis of trends and shortcomings of legal systems also feeds into an evidence-based advocacy strategy developed and implemented by UNHCR in destination and departure States and globally. Advocacy for flexibilities and, where possible and needed, legislative/policy change may take into consideration commitments made by States in the context of the <u>GCR</u>, the Global Refugee Forum (GRF) and the High-Level Officials Meeting (HLOM).

Some of the questions to consider when undertaking the initial analysis may include:

- Which existing visa streams are best suited for refugee admission through complementary pathways?
- What concessions and flexibilities (visa requirements such as waivers of police certificates from countries of origin, flexibility with regards to original documents from countries of origin/current stay, financial waivers, evidentiary waivers, remote processing, etc.) would be necessary (if any) to enable refugees to access complementary pathways?
- Are there bilateral/multilateral agreements in place that facilitate migration to the country and, if so, for which purposes?
- Could refugees be included in these agreements? If so, what changes would need to be applied for their unhindered access?
- What support do refugees require in accessing complementary pathways from the destination countries (e.g. application, form filling support, access to training, language training, certification of skills, credentialling)?
- Are exit permits required to depart and are those accessible to refugees?
- If not, what law/policy/administrative flexibilities would need to be implemented for unhindered departure?
- What integration support is necessary for complementary pathways arrivals (broken down by pathway at hand)?
- What services exist and how can they be leveraged for complementary pathways arrivals, based on pre-identified needs?
- Is there a monitoring and evaluation framework set up for the purposes of measuring programme outcomes and identifying necessary changes?
- What are the rights afforded to migrants legally arriving in the country for work/study opportunities and how can it be assured that those are fully accessible to refugees?
- What are the legal provisions for extended stay available in the migration framework, including work-related residency permits, stay requirements, naturalization requirements, etc.?

(For specific context assessments for sending and receiving Operations, you may consult Annexes <u>6a</u> and <u>6b</u>).

Upon consideration of the above questions, Operations on both destination and departure ends may consider the following next steps when designing and implementing complementary pathways programming in line with the protection considerations and key principles in chapter 9:

- Identify the most suitable visa options for refugee admission within the legal migration framework at destination States: Law firms specializing in migration as well as actors working in legal migration, including IOM, ILO, private sector companies and others, are valuable partners in this space. UNHCR may work with them to conduct a legal analysis to identify the best legal route available, flexibilities it may require to ensure refugees' access and protection, and options for legal stay and/or return to the first country of asylum.
- Identify and apply refugee-specific flexibilities for accessing complementary pathways, and
 ensure that the international protection needs and main rights of refugees are met: Ensuring
 refugees can access regular migration may entail instituting more flexible legal and administrative
 procedures, such as simplified processes, to address the specific difficulties and risks refugee
 applicants encounter. This requires a comprehensive understanding of the obstacles refugees
 face. Initiatives focused on the removal of practical barriers may include specific financial
 requirements and guarantees (visa fees), documentary requirements, alternative methods of
 confirmation of work-/study-related credentials, and an alternative approach to relationship
 verification for family reunification.
- Ensure access to identity and travel documents: Access to refugee travel documents contributes to protection from refoulement. Documentation issued for the purposes of travel also serves as a proof of identity required to access services (education, financial, etc.). It is, therefore, a protection tool valuable beyond the travel opportunities it offers. Operations should continue their advocacy on the issuance and acceptance of machine readable multi-voyage refugee travel documents, which include but are not limited to Convention Travel Documents (CTDs). These should be extendable at the consular offices at destination States and have five or more years in validity. In line with the 1951 Convention, the fees charged for such documents should not exceed the lowest scale of charges for national passports. The issuance of travel documents for persons in need of international protection should be integrated into existing State mechanisms to ensure fast and efficient procedures and to save resources. Alternative means of documentation that would provide for similar safeguards may also be considered by States not party to the 1951 Convention or the OAU Convention, or where delays and other barriers to asylum procedures render fully ICAO-compliant travel documents less available.
- Ensure refugee inclusion in national systems and services at departure States (education including TVET, financial inclusion, employment): Create linkages with development and local inclusion initiatives to enable access to training, skilling/upskilling, skills certification, and language training and certification. This can include building and improving skilling-to-hire models, that match employer requirements in destination countries and have potential dividends towards ensuring refugees eligibility for skills-based pathways.
- Consider options for scale through partnership and expansion within the existing migration framework and via bilateral arrangements for training and upskilling of foreign workforce to cover market gaps: Joint programming with IOM for inclusion of refugees in regular pathways/the existing migration system for nationals of host countries can be explored.
- Ensure the role of first countries of asylum is well understood through advocacy towards inclusion of refugees in national and international training and education frameworks:
 Benefits to the countries of first asylum are often not fully articulated in complementary pathways discourse. In addition to responsibility-sharing, countries of first asylum may benefit from remittances and appreciate the widening protection space created through complementary pathways. First countries of asylum are essential for complementary pathways in a number of ways and advocacy around those is key to successful programming. One of the key components

of their role is facilitation of documentation acquisition and freedom of movement, through exit permit issuance.

PILLAR IV: DEVELOPING POLICY AND BUILDING CAPACITY

A) Policy and guidance

Ensuring that the international protection needs of those travelling on complementary pathways are protected at all times is a paramount obligation of UNHCR. This entails ensuring that the international community protects such individuals against return to the places of danger.

UNHCR's supervisory responsibility is set out in paragraph 8(a) of its <u>Statute</u>, and in Article 35 of the 1951 Convention and Article II of the 1967 Protocol. **Monitoring State compliance with refugee-specific international obligations, including respect of family unity, and intervening where the regulatory system does not offer adequate protection of refugees' rights is a compulsory function of the organization.**

In line with these, UNHCR is the primary agency to ensure that protection principles are embedded within the design and implementation of complementary pathways and that relevant policy positions and guidance are developed, disseminated and well understood by the diverse partners involved in complementary pathways work.

Responsibility for monitoring practices, context-specific challenges and associated risks at the local level sits with UNHCR Country Operations and Regional Bureaux. This, in turn, will inform support offered to States to overcome hurdles identified and inform targeted advocacy, while building infrastructural support for refugees accessing complementary pathways.

B) Knowledge and skills development

UNHCR Operations that directly deliver protection, solutions and assistance services typically have regular training and capacity development initiatives targeting UNHCR staff and partners. These should strive to include relevant content on complementary pathways, including on preserving family unity.

Based on an analysis of the protection and local solutions context, capacity gaps and needs, the relevant trainings may include:

- an introduction to complementary pathways;
- relevant applicable legal frameworks for family reunification through national procedures;
- existing support systems (of partners) to help refugees access complementary pathways;
- relevant UNHCR, national and partner policy and guidance and necessary advocacy messages, including the role of first countries of asylum;
- linkages with existing and ongoing inclusion (livelihoods and education) initiatives, development work and other activities to ensure refugee inclusion in these with the potential dividend of accessing complementary pathways;
- the role of development and migration actors.

C) Communications with Communities (CwC)

Communicating with refugee and diaspora communities promotes knowledge and agency by ensuring access to accurate information on eligibility criteria and reliable sources of support. Refugees within these communities are best placed to be agents of information-sharing. Networks within countries of departure and diaspora should be encouraged and supported.

Offices may consider developing a communications plan including some or all of the following elements or including those in broader communications on rights, protection procedures and services:

- harnessing opportunities to communicate with communities, such as through regular community forums, meetings with community leaders and participatory assessments to disseminate information, identify potential beneficiaries/support needed, in line with <u>UNHCR's Operational Guidance on Accountability to Affected People (AAP)</u>. Refugee-led organizations should be consulted in the design and delivery of key messages and play a key role in devising and delivering specific supports and services;
- sharing information on procedures and available support (including via platforms such as UNHCR's Opportunities platform, UNHCR's Help site or partner platforms);
- developing specific tools to disseminate information, such as WhatsApp channels, adjusted to the needs of the refugee population and with the engagement of refugee and diaspora communities to ensure relevance;
- identifying refugees departing/arriving on complementary pathways and their stories and challenges and flagging them to External Relations/Communications colleagues to produce stories, videos, etc.

For more ideas on the role of communications, please consult chapter 14.

11. RELEVANT UNHCR FUNCTIONS

In line with the Roles, Accountabilities and Authorities (RAAs), Country Operations, Regional Bureaux, Divisions and Entities at HQ each serve functions in support of complementary pathways programming and support (please refer to Annex 7 for more details on the distribution of some of the roles and responsibilities that would be applicable in this context).

HQ Divisions and Entities lead on the development of the global strategy on complementary pathways and support various partners including States in developing flexible programmes to ensure refugees can access legal pathways and receive any support required. They also undertake structured and strategic global advocacy and consistently engage with global stakeholders.

Regional Bureaux provide regional oversight. This can include developing regional complementary pathways strategies and incorporating complementary pathways components in other strategies (e.g. livelihoods, education, data, protection) with the support of the Division of International Protection (DIP). It can also include advocating with, engaging with and coordinating regional actors, such as development actors, and managing regional partnerships to support resource mobilization and advocacy in order to facilitate access to complementary pathways.

In **Country Operations**, UNHCR's activities in support of complementary pathways cross-cut functional units with elements of registration and data management, communications, community-based protection, external engagement, solutions and child protection, among others. Integrating complementary pathways activities, as per the table below, into existing roles makes effective use of existing resources and ensures utmost outcomes.

It is recommended that each Protection/Solutions unit at country office and Regional Bureaux level establishes a **complementary pathways focal point**. For smaller Operations with limited capacity, Bureaux are best placed to undertake the coordination functions and work with local partners to identify gaps, trends and develop strategies on addressing them. The complementary pathways focal point coordinates with relevant functional units within UNHCR at country, regional and HQ level and with partners to support improved access to complementary pathways and create linkages with inclusion activities and development work in the local context. These focal points are particularly important at the onset of building UNHCR engagement in complementary pathways and may be mainstreamed into protection and solutions work at a later stage when relevant partnerships are in place.

While not all Operations may have the following functions, the below are suggested activities for some of the main functions. These may be adapted based on local capacity:

UNHCR	Activities
function	
Protection officers (Snr.)	Ensure complementary pathways are included in protection strategies;
omicers (Snr.)	 Develop and deliver advocacy messages to governments and other relevant entities to ensure: a) In departure States: refugee inclusion in training and upskilling; access to credentials recognition; inclusion in local education and economic inclusion programming; access to refugee travel documents (compatible with ICAO standards); issuance of exit permits, etc.; b) In destination States: visa regimes with flexibilities compatible with refugees' needs and realities; inclusion in migration frameworks; access to integration and support services including legal counselling; support with access to rights and services; Coordinate all aspects of complementary pathways activities as part of the Operation's protection strategy: a) In departure States: at the earliest stages in pathways development or implementation, consult with education and livelihoods colleagues to assess and understand the nature and availability of a "pipeline" of qualified or suitable candidates, means to access them, gaps in their training/experience, and the capacity to support them in navigating the process;
	b) In destination States: analysis of migration laws; identification of flexibilities; linkages with reception and integration partners; outreach to private sector, development actors and others of relevance to ensure a system for admission, protection and support is available;
	 Identify partner needs and work to enhance their capacity: In departure States: for support with preparation, sourcing and referrals for support services and/or submission (humanitarian pathways); In destination States: to ensure relevant migration facilitation and integration support;
	 Coordinate the network of partners by linking departure and destination countries.

Livelihoods/ Work with protection and solutions teams to identify and train partners economic (implementing and operational) to support with complementary pathways inclusion/ activities, including skills training, soft skills/interview skills building, CV drafting, and support with interviewing and departure; development officers **Include complementary pathways options** as part of the local inclusion strategies of UNHCR/partners; **Build synergies** with training and upskilling opportunities on the ground; Link up with development and UN partners (e.g. IOM) to include refugees in training and migration programmes currently in place; Support eligible refugees with work experience (e.g. through internships) to ensure they meet the necessary requirements for labour mobility. Education Ensure complementary pathways opportunities are built into education officers strategies at country level; **Disseminate information** on complementary pathways opportunities; Support partners providing academic guidance, counselling and other services to prepare students for application and selection; Encourage DAFI and other scholars in the country of asylum to be systematically registered with relevant talent catalogues or similar databases: Enhance information provision frameworks to ensure opportunities are known; Support through referral/negotiations with service providers to ensure access to language testing, access to computers, etc. Resettlement Facilitate access to travel documents and issuance of exit permits and/or /Solutions police certificates (where necessary); Facilitate referral/refer to additional service providers (including medical); **Support with departure arrangements** by referring to relevant partners; Link up with other functional units in education/livelihoods/protection to create strategies around training/upskilling/matching/departure support. Community-Craft and disseminate messages, and develop information campaigns for based the availability and requirements of complementary pathways; protection Work with community leaders to develop communication guidelines and referral frameworks to assist individuals with training and access to opportunities.

Registration/ DIMA/ Information management

- Ensure accuracy and completeness of data entered into proGres and through Digital Gateway tools in Country Operations with UNHCR registration;
- Ensure that relevant data fields (skills, prior training, certificates, work
 experience, education level, field of study, language capacity) are consistently
 included in data-collection exercises and information management reports
 and dashboards. This can be achieved through the Digital Gateway or the
 development and launch of appropriate data-collection tools (e.g. Kobo);
- Provide guidance on data entry; analyse data and trends and issue reports and findings;
- Work with other UNHCR teams (protection, solutions) to develop and implement self-service tools and forms that feed into proGres and reflect on the above data fields.

External relations/comms

- Support with communication strategies and the development of concrete messages;
- Create publicity around successes and lessons learned;
- Support with partner identification and network/coalition building efforts, including with the private sector;
- **Coordinate communications** around private sector-driven initiatives as well as those led by other partners;
- Engage with global, regional, national processes that can advance opportunities and/or draw allies in lifting obstacles.

12. PLANNING AND REPORTING

Operations should consider the key areas of UNHCR's engagement in complementary pathways as well as the <u>five pillars of engagement in family reunification</u> as part of their strategic planning processes. The degree and nature of UNHCR activities under each of area will be based on an analysis of the country context; this can include analysing the legal and administrative framework, the political and security situation, the needs and gaps in support for complementary pathways, the capacity of partners and the degree of inter-agency coordination.

For comprehensive guidance on the multi-year planning and programming processes and the COMPASS results indicator framework, operations can consult the <u>UNHCR Programme Handbook</u>. To measure progress and achievements, the UNHCR COMPASS results framework includes reporting for complementary pathways-related activities under "<u>Core Impact Indicator 4.2b</u> Number of people who departed through complementary pathways", and "<u>Core Outcome Indicator 15.3</u> Number of people admitted through complementary pathways from the host country". For guidance on the use of proGres for recording complementary pathways-related activities, refer to the <u>UNHCR Operational Guidance Note: Complementary Pathways for Admission to Third Countries Data Recording in proGres</u>.

13. MOBILIZING RESOURCES FOR COMPLEMENTARY PATHWAYS ACTIVITIES

For UNHCR: While it is imperative that core funding remains available to support overall functioning of the organization, tapping into development funding and other sources of funding not traditionally relied upon by UNHCR Operations might offer a unique way of supporting internal needs for the development and implementation of complementary pathways and building the necessary partner infrastructure for such implementation. Partnering with development and UN agencies and actors implementing programming for host communities could also provide an innovative way to support UNHCR's work in this area. Additionally, joint funding proposals led by some of these partners and reliance on secondments from partners (law firms, States and others) enable UNHCR to maintain an agile and responsible structure needed to launch and maintain complementary pathways engagement.

For partners: Supporting partners (particularly at a local level) with their fundraising initiatives helps UNHCR to build the partnership and referral structures necessary to support individuals' access to complementary pathways. This can be achieved through letters of support, direct outreach and, in some instances, partnership agreements that channel funds, among other things.

For refugees: UNHCR and its partners should consider innovative financing models, including low-interest loans, crowdfunding campaigns, reimbursable grants and the creation of funds to support individuals, employers, sponsors and others who are developing and launching complementary pathways. Many such initiatives that fund incidental expenses related to travel or visa acquisition are already on the way. Some examples include reimbursable grants by Pathway Club and the forthcoming launch of the Global Sponsorship Fund. Other similar initiatives can be put in place through the collaboration and innovative thinking by multitude of actors, including the private sector, microfinance institutions, States and others.

14. INTEGRITY AND ACCOUNTABILITY

Complementary pathways are implemented by a plethora of partners, who support with various stages of the individual's journey including in identification, referral and selection of candidates, departure, post-arrival formalities, monitoring and evaluation. UNHCR in principle will not implement all stages in a complementary pathways programme. Consequently, in this ecosystem of multiple partners, preserving integrity also becomes a shared responsibility.

UNHCR's overall response to matters of fraud and integrity is guided by the Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons, its Administrative Instructions on the Procedures and UNHCR's General Policy on Personal Data Protection and Privacy. As complementary pathways involve shared multi-partner processes, the organization's engagement in ensuring integrity will differ from that required of activities where UNHCR is involved in all stages of the process. Further guidance on these issues will be added as the future of registration at UNHCR becomes better defined.

More information on responding to suspected fraud and disclosure of actual fraud is available in Annexes 8 and 8a.

15. COMMUNICATIONS

Communication can play a key role in helping advance access to complementary pathways for refugees including by raising awareness, fostering empathy, supporting advocacy goals and influencing policy changes. Compelling narratives that focus on the stories of people with lived experience of forced displacement combined with data on the contributions they can bring to third countries can help lift the barriers preventing them to access international opportunities. Communication can also attract partners and donors and mobilize support and resources towards creating more safe pathways for refugees.

To this end, colleagues can:

A) Work jointly with stakeholders such as the Task Forces and key partners to elevate visibility of complementary pathways including by:

- Developing communication strategies with clear objectives, target audiences and action plans to support their advocacy efforts;
- Crafting clear messaging on the need for and value of complementary pathways tailored to different audiences;
- Highlighting key successes and challenges including by leveraging media and press opportunities, and high-level events;
- Developing and disseminating visibility materials such as brochures, social media materials, videos and stories that showcase innovative approaches, existing programmes, while also highlighting key barriers that prevent refugees from accessing migration pathways on an equal basis as everyone else.

B) Integrate complementary pathways into their Operations/Bureaux communication strategies to:

- Increase visibility and promote understanding of complementary pathways within the organization including by:
 - a) using strategic communication tools like broadcast messages, internal communities like Viva Engage and Teams, internal newsletters, Intranet articles and other means to promote work around complementary pathways;
 - b) organizing brown bag events and similar initiatives to connect colleagues working on complementary pathways and share experiences/lessons learned;
 - holding trainings and providing support to colleagues across different units and establishing an internal coordination group around pathways for promoting understanding and engagement of colleagues.
- Elevate complementary pathways among external audiences including by:
 - a) producing stories and promoting refugee-led storytelling opportunities across UNHCR external channels (unhcr.org, social media, GCR digital platform and others);
 - incorporating complementary pathways in talking points and presentations to governments, civil society, UN bodies, development actors, private sector and others;
 - c) leveraging on flagship UNHCR campaigns and events, and international days including World Refugee Day, International Day of Families, International Day of Education and others, to highlight complementary pathways.
- Harness opportunities to communicate with communities on complementary pathways, such as regular community forums, meetings with community leaders, and participatory assessments to spread information.

Please refer to this sample <u>communication plan</u> as a template for developing communication strategies inclusive of complementary pathways. All communication materials developed should be in line with <u>UNHCR's Ethical Communication Guidelines</u>. Talking points for pathways are available in Annexes <u>10a</u>, <u>10b</u>, <u>10c</u> and <u>10d</u>.

16. RESOURCES

The list below highlights some of the key resources that are essential for engaging with complementary pathways work.

Complementary pathways general resources

- Complementary Pathways Operational Guidance website
- Complementary Pathways Glossary of Key Terms
- Complementary Pathways e-learning course
- Complementary Pathways Community of Practice (internal)
- 2023 Global Refugee Forum pledging documents
- UNHCR.org webpage on complementary pathways
- Intranet page on complementary pathways (internal)

Data on complementary pathways

OECD-UNHCR Safe Pathways for Refugees Report IV

ExCom Conclusions and other key documents

- Conclusion No. 117 (LXXV): Durable Solutions and Complementary Pathways Adopted by the Executive Committee (2024)
- Conclusion No. 114 (LXVIII): Machine-Readable Travel Documents for Refugees and Stateless
 Persons Adopted by the Executive Committee (2017)
- Conclusion No 49 (XXXVIII): Travel Documents for Refugees Adopted by the Executive Committee (1987)
- Conclusion No. 13 (XXIX): Travel Documents for Refugees Adopted by the Executive Committee (1978)
- Third Country Solutions for Refugees: Roadmap 2030
- Note on International Protection Standing Committee 69th Meeting

Operational Guidance

- UNHCR Operational Guidance: Facilitating Family Reunification for Persons in Need of International Protection
- UNHCR Operational Guidance Note: Complementary Pathways Data Recording in proGres

Global Task Forces

- Global Family Reunification Network (FRUN)
- Global Task Force on Refugee Labour Mobility
- Global Task Force on Third Country Education Pathways
- Global Refugee Sponsorship Initiative

Resources for refugees

- Opportunities (scholarship portal for refugees)
- Help.unhcr.org (information for refugees)

17. REFERENCES

For guidance on the use of proGres for recording complementary pathways-related events and assistance refer to UNHCR Operational Guidance Note: Complementary Pathways for Admission to Third Countries Data Recording in proGres.

18. MONITORING AND COMPLIANCE

The Division of International Protection, Resettlement and Complementary Pathways Service, is responsible for monitoring these Guidelines globally, in consultation with the Regional Bureaux, who monitor and support their consistent application in respective Country Operations.

19. CONTACT

The contact for these Guidelines is the Resettlement and Complementary Pathways Service, Division of International Protection, at hqdiprcps@unhcr.org. Inquiries concerning the context-specific application of these Guidelines and/or relating to individual cases should first be addressed to the relevant Regional Bureaux focal point/s. For additional support and guidance in implementing specific aspects of these Guidelines, consult the UNHCR Complementary Pathways Community of Practice and the UNHCR Intranet Complementary Pathways for Admission to Third Countries page. Focal points at UNHCR HQ monitor and provide additional guidance on specific questions relating to the implementation of these Guidelines on the Complementary Pathways Teams channels.

DATES AND PLACEMENT

These Guidelines will enter into force upon issuance and will be reviewed by 31 December 2029. These Guidelines will be uploaded to the Intranet and in this website.

