

Country Strategy Evaluation

# Somalia 2020 - 2024



EvO/2025/11

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## UNHCR Evaluation Office

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## Evaluation information at a glance

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# Abbreviations and Acronyms

Abbreviation	Full Name
ABP	Area-Based Programming
ABOD	Administrative Budget and Obligation Document
AfDB	African Development Bank
AMISOM	African Union Mission in Somalia
ATMIS	African Union Transition Mission in Somalia
AU	African Union
AWF	Affiliated Workforce
CBI	Cash-Based Interventions
CCCM	Camp Coordination and Camp Management
CERF	Central Emergency Response Fund,
CO	Country Operation
COOPI	Cooperazione Internazionale
CRI	Core Relief Item
DAFI	Albert Einstein German Academic Refugee Initiative
DSRSG/RC/HC	Deputy Special Representative of the Secretary-General, Resident and Humanitarian Coordinator
DTM	Displacement Tracking Matrix
DRC	Danish Refugee Council
FAO	Food and Agriculture Organization
FGS	Federal Government of Somalia
FMS	Federal Member States
GBV	Gender-Based Violence
GCR	Global Compact for Refugees
GCRI	Galmudug Commission for Refugees and IDPs
GDP	Gross Domestic Product
HDP	Humanitarian, Development and Peace
HNRP	Humanitarian Needs and Response Plan
INGO	International Non-Governmental Organisation
IOM	International Organisation for Migration
ILO	International Labour Organisation
IASC	Inter-Agency Standing Committee
IDP	Internally Displaced Persons
IFLR	Integrated First-Line Response Framework
IGAD	Intergovernmental Authority on Development
IPC	Integrated Food Security Phase Classification
IPMC	Implementing Partnership Management Committee
HLP	Housing, Land, and Property
JUCRI	Jubaland Commission for Refugees and IDPs
MYSP	Multi-Year Strategic Plan
NDRA	National Displacement and Refugee Agency
NCRI	National Commission for Refugees and IDPs
NDP-9	Ninth National Development Plan
NDSS	National Durable Solutions Strategy
NGO	Non - Governmental Organisation
NRC	Norwegian Refugee Council
OECD	Organisation for Economic Co-operation and Development
OCHA	Office for the Coordinator of Humanitarian Affairs
OIOS	Office of Internal Oversight Services
OL	Operating Level Budget
OP	Operating Plan
OPS	Operations Costs
PRMN	Protection and Return Monitoring Network
PSMN	Protection and Solutions Monitoring Network
RSD	Refugee Status Determination



RMS	Results Monitoring Surveys
SHF	Somalia Humanitarian Fund
SWSCRI	Southwest State Commission for Refugees and IDPs
TOR	Terms of Reference
UN	United Nations
UNCT	United Nations Country Team
UNDP	United Nations Development Programme
UNEG	United Nations Evaluation Group
UNFPA	United Nations Fund for Population Activities
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UNSOM	UN Assistance Mission in Somalia
UNSDCF	United Nations Sustainable Development Cooperation Framework
UNSOS	United Nations Support Office in Somalia
UNTMIS	UN Transitional Assistance Mission in Somalia
WASH	Water, Sanitation, and Hygiene
WFP	World Food Programme

# EXECUTIVE SUMMARY

## INTRODUCTION AND METHODOLOGY

This Country Strategy Evaluation (CSE) examines UNHCR's strategy, portfolio and performance in Somalia between January 2020 and December 2024. It assesses UNHCR's strategic positioning, operational relevance, and comparative advantage in supporting forcibly displaced and stateless populations. The evaluation has a strong focus on learning and accountability, and is formative in nature, aiming to generate practical insights for the formulation of the next Multi-Year Strategic Plan (MYSP). It will also contribute to discussions surrounding the 2026–2030 United Nations Sustainable Development Cooperation Framework (UNSDCF).

Since January 2025, UNHCR has been facing a period of financial uncertainty, owing primarily to the freeze on all foreign aid decided by the United States – historically, its biggest donor. This led to a delay in the formulation of the new MYSP to 2026.

The scope of the evaluation spans UNHCR's entire operational portfolio in Somalia, including regular programmes and emergency responses. It encompasses all forcibly displaced groups, host communities, and UNHCR's fitness for purpose to deliver its strategic vision. The analysis also considers UNHCR's alignment with Somalia's national development priorities, regional and global commitments, and UNHCR's own strategic objectives.

The evaluation employed a participatory approach, structured around four key evaluation questions broken into eighteen sub-questions aligned with the evaluation criteria defined by the Development Assistance Committee of the Organisation for Economic Co-operation and Development (relevance, coherence, effectiveness, and efficiency), and supported by a reconstructed Theory of Change and evaluation matrix. The evaluation designed four case studies to guide planning, data collection and analysis, and to triangulate desk analyses with primary data. A total of 156 semi-structured interviews were conducted across six locations (Mogadishu, Baidoa, Dollow, Galkayo, Hargeisa, and Kismayo). Site visits were undertaken between November and December 2024, followed by consultation processes supported by UNHCR staff.

The evaluation encountered some limitations, including insecurity and restricted access in certain regions, high staff turnover, and gaps in UNHCR's data and monitoring frameworks. Despite these challenges, the evaluation presents an evidence-based assessment, triangulated through field observation, stakeholder consultation, and document review. Quality assurance was guided by UNHCR and United Nations Evaluation Group (UNEG) standards, with adherence to ethical guidelines, confidentiality protocols, and principles of transparency and inclusion throughout the process.

## FINDINGS

### Relevance

UNHCR's programming in Somalia broadly aligns with national priorities, regional frameworks, and global commitments, including Somalia's National Development Plan, Intergovernmental Authority on Development (IGAD) protocols, regional frameworks and the Global Compact for Refugees. The organisation's evolving strategic posture reflects an intent to transition from emergency relief to more sustainable, solutions-oriented programming. However, persistent challenges — such as insecurity, limited access to rural areas, the complex political environment,



fragmented data, government capacity, and declining international resources, continue to hinder a full focus on resilience.

Efforts to tailor assistance to Somalia's dynamic context have included the adoption of conflict- and climate-sensitive programming, however, an urban bias in aid delivery has inadvertently deepened disparities with rural areas. Many IDPs in rural and hard-to-reach areas remain underserved. The urban-centric focus has resulted in unintended consequences, such as increased conflict, poverty and environmental degradation (contrary to UNHCR's Focus Area on Climate Change), especially in already overstretched urban centres.

The growing acceptance of Area-Based approaches<sup>1</sup> shows significant promise in addressing these imbalances by enabling more contextually grounded, locally driven, and climate-sensitive interventions. It facilitates collaboration with national and sub-national authorities and has the potential to improve relevance by strengthening protection, for example, through community-based protection and improving information flow from under-served areas. However, full realisation of this approach is constrained by cumbersome inter-agency coordination mechanisms.

Although UNHCR's programming incorporates global priorities such as those outlined in the Policy on Engagement in Situations of Internal Displacement, and visions for long-term solutions, budgetary allocations have remained largely skewed toward lifesaving and protection activities. Despite corporate efforts to provide guidance (for example 2024 Sustainable Programming Note, 2024 Explainer for UNHCR Operations), funding priorities have not meaningfully shifted to support resilience at scale, economic inclusion, or national systems development over the evaluation period, in spite of the objective contained in the Multi-Year Strategic Plan (MYSP).<sup>2</sup>

UNHCR Somalia's use of evidence is shaped by rapid assessments, participatory exercises, and post-distribution monitoring. While these tools offer valuable insights, the lack of cohesive monitoring systems and inconsistencies in data collection and quality, which is particularly mandate-critical in the case of implementing partner reporting, undermine adaptive management, and the reliability and optimisation of programme design and delivery. Coordination with partners, especially through tri-cluster leadership offers strategic reach. However, over time, a more directive and decreasing number of operational partnerships, intended to streamline management and oversight of the operation, has weakened grassroots engagement and diluted localisation efforts.

## Fit for Purpose

UNHCR Somalia's operational structure and workforce have demonstrated adaptability in the face of shifting demands and growing constraints. The organisation has made substantial efforts to increase efficiency by nationalising its workforce, reducing international staff by 26% and increasing national recruitment by 23% between 2022 and 2024. This strategy helped lower costs and build local capacity, but it also led to critical gaps in expertise, especially in protection, durable solutions, and operational management. Efforts to align human resources with strategic priorities included the deployment of technical experts in disaster management and protection, as well as targeted training initiatives. However, the lack of a clear medium-term human resources policy and strategic workforce planning has hindered establishment of a fully fit-for-purpose workforce.

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<sup>1</sup> ABP is an approach that defines an area as the primary entry point, rather than a sector or target group. The HDP solutions are generally considered to be most valuable when linked to ABPs, and to also include the fourth nexus element; resilience to climate change. It is particularly appropriate in areas with complex, inter-related and multi-sectoral needs. ABP has been translated in Somalia as Area-Based Coordination, transforming a contextual analysis into a system of interaction among UN and NGOs present in an area

<sup>2</sup> The MYSP includes « Refugees, IDPs and returnees have improved access to alternative pathways and a range of durable solutions (Impact Area 4: Solve) »

Staff continue to juggle multiple roles, increasing pressure in complex contexts like Mogadishu and Kismayo.

The staffing challenges were compounded by persistent vacancies - 39.8% of planned positions remained unfilled in 2024 - and frequent staff rotations, especially at sub-national levels. These dynamics limited institutional memory, contextual understanding and reduced operational continuity, particularly in hard-to-reach areas where access was already constrained by security protocols and bureaucratic obstacles.

UNHCR's field presence has supported strong relationships with authorities and enabled leadership in Camp Coordination and Camp Management (CCCM), Protection, and Shelter clusters. However, the decentralised model is costly, and budget constraints have led to a growing imbalance: staffing lines are consuming an increasing proportion of the operational budget, while funds available for direct service delivery (OPS budget line) have declined sharply. UNHCR Somalia shows a ratio of staff and administrative budget to operations costs (OPS) that is well above UNHCR standards (30% / 70%), indicating a lower availability of funds for operations. UNHCR's funding model remains heavily reliant on a single donor, the United States (73% of total funding for the period under review). Attempts to diversify funding and engage development actors showed some promise in 2024 but remain nascent. Likewise, the organisation's push toward localisation and sustainability has been undermined by inconsistent capacity-building and continued substitution of government roles, particularly in asylum system development.

Despite these challenges, UNHCR's decentralised engagement frameworks offer a potential pathway to a more sustainable, climate-aware, and locally grounded contribution. The wide-ranging field presence is a strength. Still, operational efficiency is impeded by overlapping planning frameworks, unclear accountability structures, and high coordination costs.

### **Synergies and Partnerships**

UNHCR Somalia has made deliberate efforts to streamline its partnerships and align coordination mechanisms with evolving operational priorities. The reduction in non-governmental organisation (NGO) partners from 17 to 6 in 2024 aimed to minimise fragmentation, enhance accountability, and reduce administrative overheads.

The organisation's tri-cluster leadership role - in Protection, CCCM, and Shelter - remains a cornerstone of its collaborative engagement. However, unlike food, nutrition, water and sanitation, which are considered central to emergency responses and extensively funded in Somalia, UNHCR's investment in the IDP response remained comparatively more marginal. This has left the organisation with a lateral role in inter-agency coordination, further complicated by ambiguous national frameworks and competition over mandates.

UNHCR's implementing partnerships have increasingly taken on a transactional nature, as noted by implementing partners, many of whom regard UNHCR primarily as a funding agency. The organisation has successfully reached out to development banks, which allowed it to sign a significant funding agreement in 2023 with the African Development Bank (AfDB). Yet strategic engagement has remained constrained by rigid funding modalities (90% earmarking) and limited contingency planning. Recent efforts to prioritise national organisations, including government bodies, reflect UNHCR's localisation commitments under frameworks like the Grand Bargain. Nonetheless, the impact has been mixed. While some progress was made in maintaining national partner engagement despite shrinking budgets, challenges persist - including weak shared decision-making structures, and accountability gaps as also highlighted in audits.

## Contributions to Envisioned Results

UNHCR's contribution to strategic objectives has been meaningful in protection and assistance, but progress has been hampered by serious weaknesses in planning, monitoring, and data systems. The Results Monitoring Surveys (RMSs) are the most consistent source of quantitative data but, alone, are insufficient to validate UNHCR's claims of performance. These deficiencies hinder the accurate measurement of programme effectiveness and present ongoing challenges to planning, evidence-based decision-making, and institutional accountability.

Despite these limitations and based on available verified evidence, the evaluation notes that UNHCR made several important contributions during the evaluation period (2020–2024). Key achievements included its support for the development of national legal and institutional frameworks—most prominently, the adoption of the Refugee Law—and efforts to enhance the technical capacity of Somalia's National Commission for Refugees and Internally Displaced Persons. UNHCR undertook systematic measures to strengthen the national asylum system, including capacity-building initiatives targeting the National Commission, the simplification of asylum procedures, the prioritisation of cases involving vulnerable individuals, and the revision of standard operating procedures. However, the asylum backlog remained largely unchanged, with 11,063 asylum seekers in Puntland still awaiting Refugee Status Determination (RSD) as of the end of October 2023.<sup>3</sup> The transfer of RSD responsibilities to the Federal Government of Somalia (FGS) was hindered by lack of dedicated UNHCR staff, political instability, shortage of civil service personnel, procedural gaps in the RSD process, the absence of a dedicated public budget, and the regional fragmentation of asylum governance mechanisms.

On the humanitarian front, Cash-Based Interventions (CBI) and Core Relief Items (CRI) distributions have played a critical role in meeting basic needs and reducing economic vulnerability, particularly among high-risk profiles. Though these interventions received high beneficiary satisfaction scores, their scale remains insufficient in light of the immense needs, especially among IDPs, which speaks to the importance of enhancing engagement of non-transactional partners including where possible the private sector. UNHCR's and partners response to Gender-Based Violence (GBV), one of the highest budgeted outcomes of the operation has improved awareness and case referral mechanisms but does not appear to have significantly reduced the persistence of GBV-related risks.

In general, the provision of basic services such as health, and education has been dependent on funding from UNHCR (and other actors) which, combined with the difficulties in developing national systems and capacities, poses a challenge to sustainability. UNHCR's work to improve access to livelihoods, both through interventions and through its catalytic role since 2023, has helped to raise awareness about the economic inclusion of forcibly displaced persons in national policies and mobilise local actors. However, UNHCR's efforts to enhance self-reliance through livelihood interventions have been limited by an unfavourable macroeconomic situation, a predatory informal economy, misconceptions by some refugees who think that if they accept the cash grants for livelihood, they will not be considered for resettlement, or for other future cash assistance programmes. Other factors that have also negatively impacted support to self-reliance refer to an underdeveloped private sector and contextual barriers including access to land as a fundamental means of livelihood for many communities. Consequently, dependency on aid to meet basic needs remains a reality among FDP and their hosts.

UNHCR's performance in cross-border coordination and protection also shows potential, particularly through established links with operations in Kenya, Ethiopia, Djibouti, and Yemen.

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<sup>3</sup> Most recent data available to the evaluation team.

These efforts enable better population tracking and data sharing, through a more strategic, better coordinated route-based approach is still needed.

## CONCLUSIONS

UNHCR Somalia's operation from 2020 to 2024 demonstrated both commitment and local level adaptation amid an increasingly complex humanitarian landscape. The organisation has consistently upheld its protection mandate, delivering critical assistance in a context marked by insecurity, displacement, and recurrent climate shocks. Its broad field presence, cluster leadership roles, and sustained engagement with federal and sub-national authorities underline its unique positioning to bridge emergency response with longer-term benefits.

However, the evaluation reveals that despite these strengths, UNHCR's transformative impact has been limited by structural rigidity caused by an excessive focus on outputs rather than intervention logic, by resource constraints coupled with weak priority setting, and a lack of strategic management and systematic monitoring of outcomes. Relations with government agencies at all levels, a key strength, are hampered by the fragmentation of the state in Somalia. Urban-focused programming has reinforced dependency on aid and neglected rural and hard-to-reach communities. Coordination efforts, particularly through UN clusters, have required considerable time yet have not translated into effective synergies with development actors. The organisation has not been able to build on certain assets, such as Protection First policies among UN agencies, or climate change policies through Area-Based Programming (ABP), to develop a transformative approach for these aspects.

The evaluation identified a critical tension between refugee protection and emergency assistance focused on local response on the one hand, and the pursuit of UN interagency coordination along with broad systemic efforts toward self-reliance for refugees and IDPs on the other. While life-saving interventions, such as protection services, shelter, and basic needs assistance remain central, efforts to scale up livelihoods and systems strengthening have been hindered by insufficient funding, technical gaps, and weak and labour-intensive partnerships.

At a deeper, more corporate level, UNHCR's planning and monitoring systems fall short of providing a basis for strategic clarity. The organisation has struggled to translate its strategic ambitions, as outlined in the MYSP, into actionable, measurable results frameworks and interventions. It has not been able to set clear organisational priorities and interpret meaningfully the very wide array of corporate policies (as opposed to a more passive broad alignment). This has led to the delivery of a wide range of fragmented outputs, especially outside Mogadishu, a large collection of guidance documents, and a lack of clarity in resource allocation across its four impact areas and in terms of staffing.

Internally, UNHCR's workforce model, which prioritised nationalisation and decentralisation, enhanced contextual relevance but reduced institutional memory and strained technical capacity. Persistent staff turnover and unclear medium-term human resource strategies undermined continuity and innovation.

In sum, UNHCR Somalia is at a crossroads. Its strengths in protection, its deep field knowledge, and its convening power position provided potential for a stronger catalyst role with a more locally led, and resilient response system. But to fulfil this role, the organisation must avoid pursuing too many directions defined predominantly at the level of outputs, sharpen its strategic focus, and invest in systems and partnerships that support long-term transformation alongside immediate humanitarian needs.

## MAIN RECOMMENDATIONS

In light of growing financial uncertainty, the evaluation outlines pragmatic recommendations grounded in operational realities as of the end of 2024. These are designed to help UNHCR Somalia recalibrate its strategic posture, rebalance priorities, and strengthen resilience ahead of the next MYSP period.

**Analytical Premise:** Who to engage with and how to engage with them is the central question for the formulation of the new MYSP. It will define the type of system-wide role that UNHCR can play in Somalia. Enhancing programmatic relevance can be done through spatially defined planning and engagement without altering planned objectives, and whilst also supporting creation of a joint focus across outcomes.

**Recommendation 1 (for CO): Strengthen Institutional Partnerships and Localisation**  
UNHCR should narrow and deepen the focus of the operation, enhancing national capacity by creating a unified area-based operational framework with the authorities.

**Recommendation 2 (for the CO): Strengthen the local level of agreements on ABP.**  
UNHCR should develop decentralised geographically defined agreements on ABP with sub-national governments while continuing its dialogue with federal-level partnerships on the same.

**Recommendation 3 (for the CO): Adopt a more transformative approach to partnership.**  
In line with the guidance on Sustainable Responses and the Global Compact on Refugees, UNHCR should pivot towards the convening and catalytic role that it now needs to play more systematically in achieving results.

**Analytical Premise: UNHCR has scope to maintain a focus on life-saving support and protection promoting solutions through support to policy and legal work and by strengthening nexus working and use of ABP:** UNHCR is able to promote self-reliance by leveraging investments from international financial institutions (IFIs) and by strengthening nexus-oriented approaches as bridging mechanisms that do not require direct implementation or additional resource inputs from UNHCR. Simultaneously, the organization should continue to support the development of a legal and policy framework that facilitates integration and inclusion. Within this strategic direction, opportunities emerge in programmatic areas such as micro-financing through cash-based interventions (CBIs) or specialized partners, land tenure protection, and support to local actors with significant implementation capacity. These approaches can be pursued without organizational adjustments (staffing and presence in Somalia) and align with a population-centric focus in the MYSP, which seeks to connect localised opportunities with the realistic scope of UNHCR's access to resources.

**Recommendation 4 (for CO and field presences):** UNHCR should focus on a delivery agenda including asylum capacity development, urgent protection needs and long-term inter-agency support on protection for both IDPs and refugees.

**Recommendation 5 (for CO and field presences):** UNHCR should counteract urbanization pressures by enhancing rural service delivery to reduce displacement pull factors in accessible areas.

**Analytical Premise: Enhancing Monitoring, Coordination, and Data Systems.** Reducing the number of outputs to be achieved in the next MYSP (or alternatively the envisaged extension of the current MYSP) will aid a realistic fit to staffing of the CO. This should be accompanied by a reshaping of the monitoring system, with greater emphasis on the tracking of change beyond output level (i.e. tracing effects on population groups), including an enhanced focus on quality of deliverables and use of lighter and more visual forms of reporting.

**Recommendation 6 (for HQ, Regional Bureau, CO):** UNHCR should strengthen monitoring frameworks for data consistency and accountability.

**Recommendation 7 (for CO):** UNHCR should establish a clear protection and area-based identification of hazards and capacities of local NGOs and local Government to operationalize the Humanitarian-Development-Peace Nexus.

**Analytical Premise: Building Operational Resilience.** Human resources will be a key theme in 2025 and after. Renewed attention to this aspect should help new staff better understand the operation and assimilate to institutional memory. Such measures would also help strengthen UNHCR's convening power in a context like Somalia where lack of staffing continuity negatively affects organizations.

**Recommendation 8 (for HQ, Regional Bureau, CO):** UNHCR should align staffing strategies with operational needs. UNHCR should emphasise onboarding, targeted recruitment, and strategic succession planning, and it should consider extending the current standard assignment length beyond two years.

**Recommendation 9 (for HQ, Regional Bureau, CO):** UNHCR should optimise its field presence and financial sustainability.

**Analytical Premise: Addressing management challenges:** Both the various OIOS audit reports and the evaluation findings have identified weaknesses in specific management areas of the operation that affect organisational and programme performance and require special attention.

**Recommendation 10 (for Regional Bureau, and CO):** UNHCR should draw up a plan to improve the overall management of the operation, programme performance and to accelerate the implementation of the OIOS auditors' recommendations.



# 1. OBJECTIVE, SCOPE AND METHODOLOGY

1. The full version of this chapter can be found in the Inception report.

## Evaluation purpose and scope

2. This Country Strategy Evaluation presents findings, conclusions, and recommendations on UNHCR's operations in Somalia. It aims to assess:
  - UNHCR's performance considering its mandate, strategic vision, results and achievements, the operational context, and the needs of forcibly displaced, stateless people and host communities.
  - UNHCR's strategic positioning and comparative advantage, promising practices and lessons, and provide forward-looking strategic and operational recommendations.
3. The Country Strategy Evaluation is intended to provide evidence for the formulation of the next UNHCR's Multi-Year Strategic Plan (MYSP) for Somalia and United Nations Sustainable Development Cooperation Framework (UNSDCF) for 2026-2030.
4. The evaluation focuses on the period from January 2020 until December 2024. The analysis runs across all the states in Somalia (including Somaliland), it covers the entirety of UNHCR's portfolio, and includes interventions involving all categories of forcibly displaced, people at risk of stateless, and host populations.

## Recent developments

5. Although outside the scope of the evaluation, the report coincides with the start of the new administration in the United States (2025-2028) and the first measures regarding US funding to the UN system and international organisations. The evaluation team believes that the recommendations for Somalia cannot be isolated from the broader context of full transformation.

## Evaluation Questions and Approach

6. As foreseen in the TOR, the design of the evaluation integrated an inception visit to Mogadishu that informed the submission of an Inception Report and a Desk Review. The inception visit was followed by another country visit, this time to Mogadishu and five other locations (Baidoa, Dollow, Galkayo, Hargeisa, Kismayo) to collect primary data. Finally, the evaluation team prepared the present Evaluation Report.
7. The evaluation findings follow the four main evaluation questions that align with four of the five assessment criteria defined by the Development Assistance Committee of the Organisation for Economic Co-operation and Development, i.e., relevance, coherence, effectiveness, and efficiency. Evaluation questions and sub-questions are presented in an Evaluation Matrix and were used to reconstruct and test the assumptions embedded in the Theory of Change (see Appendix 5).

## Data Collection and Analysis

8. Data collection and analysis were structured around four case studies, interviews with UNHCR staff and other stakeholders, focus group discussions and document analysis, including of UNHCR Results Monitoring Surveys (RMS) from 2022 and 2023. Field work for the case studies was conducted in November-December 2024. The four case-studies were conducted to understand UNHCR's portfolio and strategic-operational issues in Somalia, and to triangulate data from the document analysis and interviews. In Galkayo, the case study explored an operational dilemma associated with the organisational aspiration to proactively 'prepare for and step into emergencies that result in significant internal displacement'<sup>4</sup>, whilst simultaneously shifting from implementer to catalyser as specified in the organisation's guidance for Sustainable Response<sup>5</sup>. The Hargeisa case study examined UNHCR's focus on refugees and Area-Based Programming (ABP)<sup>6</sup> in support of IDPs and durable solutions.<sup>7</sup> The Baidoa and Kismayo case studies explored tensions relating to implementation of a whole-of-society approach and the "do no harm" principle. In Mogadishu, the evaluation team looked at how the operation managed the allocation of limited time and resources to respond to competing pressures relating to, respectively, horizontal partnerships and vertical accountability to forcibly displaced and people at risk of stateless.
9. The evaluation team conducted 156 semi-structured interviews, focus group discussions on the locations visited, and a review of UNHCR's reports, databases and external documents. The RMSs offered disaggregated data that contributed to the evaluation's consideration of gender and diversity aspects in the field.

## Governance and Quality Assurance

10. Evaluation quality control was based on UNHCR's internal Evaluation Quality Assurance system aligned with UNEG Norms and Standards for Evaluation. Quality control was also carried out by the evaluation team through a process of peer review and self-evaluation assisted by the CO team and the Evaluation Office. The evaluation is aligned with the UNEG Ethical Guidelines and Code of Conduct<sup>8</sup>, as well as the UN Supplier Code of Conduct<sup>9</sup>. Efforts have been made by the team to demonstrate transparency; systematically consider cultural diversity and inclusion; guard independence; seek informed consent, secure anonymity and confidentiality; and proactively observe visions for "do no harm".

## Limitations Encountered

11. The main limitations were partial availability of key informants and limited movement due to security issues, and the fact that UNHCR's monitoring system contains little disaggregation of data or tracking of changes outlined in its results framework. It contains little continuity of indicators between operational plans, and it comes with considerable heterogeneity of data sources, many containing quality issues. The field visits were conducted as planned, except

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<sup>4</sup> Policy on UNHCR's Engagement in Situations of Internal Displacement.

<sup>5</sup> Sustainable Response involves maximizing self-reliance and minimizing dependency on humanitarian aid [...] expanding the human potential of forcibly displaced people and putting basic services such as education, health care, housing and water on a sustainable footing.

<sup>6</sup> « ABP in fragile-and conflict-affected contexts », Huma Haider, Overseas Development Institute, 2021. Also « Evaluation of EU Cooperation in South Sudan », May 2025, Emery Brusset et al.

<sup>7</sup> The Policy on Engagement in Situations of Internal Displacement, for example stipulates that 'UNHCR will seek to maximize opportunities to respond through area-based approaches and integrated programming that are inclusive of all relevant population groups in a given operational context'.

<sup>8</sup> UNEG Code of Conduct for Evaluation in the UN system (2008).

<sup>9</sup> UN Supplier Code of Conduct (2018).

for Berbera, which could not be visited for lack of time. The visit to Galkayo was constrained by the absence of key UNHCR personnel and the difficulty for partners to join workshops. The Theory of Change workshop was consequently only implemented in Hargeisa.

12. The evaluation experienced methodological tension. The theory-based approach prescribed in the TOR is grounded in defining the intended results and identifying the corresponding evidence that allows the verification of whether these results were achieved. The combination of this method with a more participatory and grounded approach (dictated by the paucity of reliable documentary information and the diversity of situations at sub-national level) meant that assessment of the sub-questions had to be integrated into the case studies.

## 2. CONTEXT AND RESPONSE

### Country Profile

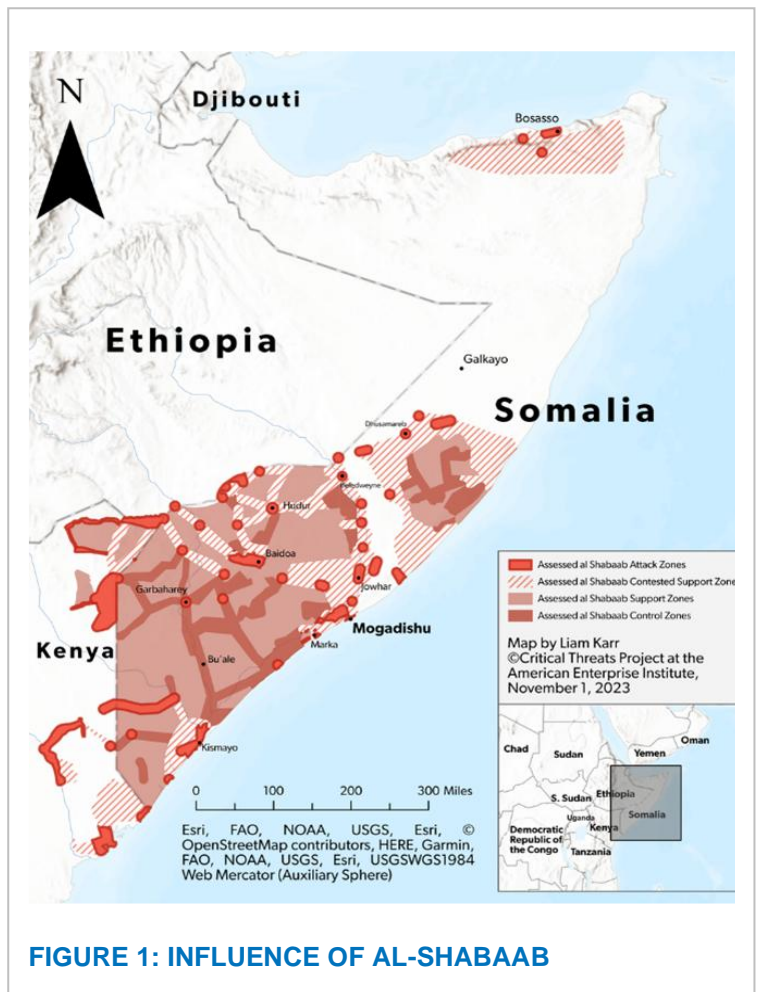
13. This section presents the main characteristics of the country, which are relevant to UNHCR's interventions and to the evaluation. A complete context analysis was provided in the Desk review.

#### PROFILE AND SECURITY

14. The 2024 Humanitarian Needs and Response Plan for Somalia puts the total population at 18.7 million, with half living in urban areas, with Mogadishu being the most populous city and the political and economic hub. Other major urban centres with a population of over 200 000 include Hargeisa and Berbera in Somaliland, as well as Kismayo (Lower Juba) and Marka (Lower Shebelle)<sup>10</sup>.

15. Over the past 25 years, Somalia experienced continuous conflict, several extended droughts and two declared famines as well as repeated floods.<sup>11</sup> The 2021-2023 drought in East Africa, including Somalia, is considered the worst in four decades.<sup>12</sup> The Federal Government of Somalia declared a drought in April 2021 and a drought emergency in November 2021. The disaster affected millions, coinciding with global price hikes, ongoing insecurity, and the aftermath of the COVID-19 pandemic. The international community activated the humanitarian system-wide Scale Up protocols in August 2022.<sup>13</sup>

16. Since 1991, widespread violence, clan rivalries, the emergence of warlords, and fluctuating trends in displacement have created



<sup>10</sup> Sources: UN OCHA Somalia Floods Update, March 2020; UNHCR Somalia Displacement Report, March 2020; FAO Desert Locust Bulletin, February - July 2020; Amnesty International Report, April 2020; FEWS NET Somalia Seasonal Monitor, December 2020; UN Somalia Situation Report, November 2020; FEWS NET Somalia Drought Alert, March 2021; Human Rights Watch Somalia Brief, February 2021; UN Somalia Political Update, May 2021; UN OCHA Somalia Flood Update, May 2021; Amnesty International Somalia Update, September 2021; FEWS NET Food Security Outlook, April - May 2022; UNHCR Somalia Internal Displacement Report, February 2022; UN Somalia Food Security Cluster, August 2022; UN OCHA Somalia Situation Report, August 2022; UN OCHA Somalia Flood Update, October 2022; UN Security Council Somalia Update, December 2022; FEWS NET Somalia Seasonal Monitor, March 2023; Human Rights Watch, March 2023; UN OCHA Flash Update, April 2023; FEWS NET Somalia Displacement Alert, April 2023; UNHCR Somalia Situation Report, September 2023; FEWS NET Climate Outlook, March 2024; UN Somalia Security Brief, June 2024; FEWS NET Somalia Climate Outlook, March 2024; UN OCHA Somalia and historical conflict patterns.

<sup>11</sup> UNHCR Somalia Fact sheet, 2024.

<sup>12</sup> OCHA drought response plan, 2022.

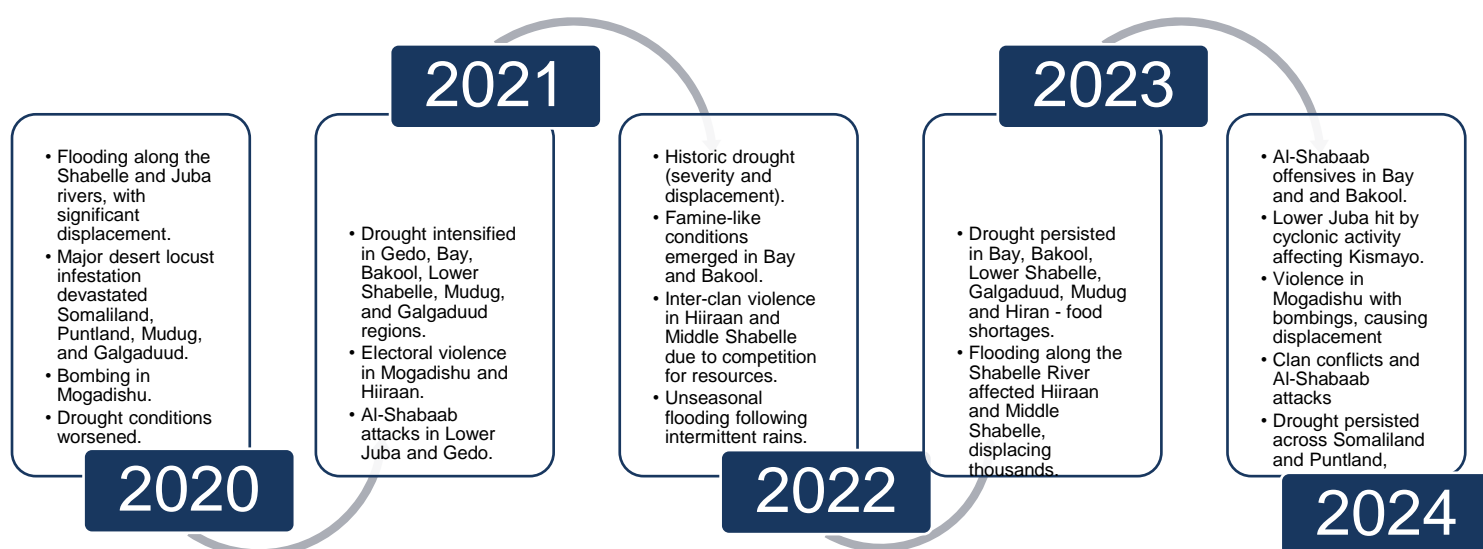
<sup>13</sup> United Nations, "Political Tensions and Electoral Process in Somalia, 2020–2024," UN Somalia Report, 2024.

ongoing instability.<sup>14</sup> The observed increases in tensions are driven by climate change and the ongoing conflict with Al-Shabaab.<sup>15</sup> which continues to exert control over large parts of southern and central Somalia (see figure 1 above).

17. Somalia adopted a federal system in 2012, but clan-based politics dominate, fragmenting the political landscape. Five Federal Member States (FMS) were established based on clan majorities, fostering sub-national identities. Somaliland, an FMS that declared independence in 1991, operates autonomously from the FGS but lacks international recognition.<sup>16</sup> Key political challenges include: a) Fragile relationships between the central government and FMS, b) Limited decentralization and power-sharing; and c) Clan rivalries complicating governance and fostering conflict.

18. A timeline (see figure 2 below) is provided, highlighting the major climate and security events over the past 5 years, including the historical drought in 2022. The events have influenced the flow and well-being of displaced populations and UNHCR's response.

**FIGURE 2 TIMELINE OF KEY CONTEXTUAL EVENTS 2020-2024**



Sources: UN Office for the Coordinator of Humanitarian Affairs (OCHA and clusters reports, UNHCR Somalia Displacement Reports, Food and Agriculture Organization (FAO) Desert Locust Bulletin, Amnesty International, FEWS NET Somalia Seasonal Monitor, Human Rights Watch

## LEGAL ENABLING ENVIRONMENT

19. Somalia is a State party, without reservations, to the 1951 Refugee Convention and the 1967 Protocol as well as the Convention on the Rights of the Child, the Convention on the Rights of

<sup>14</sup> United Nations Office for the Coordination of Humanitarian Affairs (OCHA), "Somalia: Humanitarian Needs Overview 2023," OCHA Report, 2023.

<sup>15</sup> Council on Foreign Relations, "Conflict with Al-Shabaab in Somalia," Global Conflict Tracker, 2023. Adherends (October 2024). <https://wardheernews.com/tribalism-and-its-challenges-to-state-formation-in-somalia/>

<sup>16</sup> 'Can Somalia restore faith in its federal agenda?' Abdinor Dahir, London School of Economics, November 2021, <https://blogs.lse.ac.uk/africaatlse/2021/11/29/can-somalia-restore-faith-in-its-federal-agenda-federalism-governance-decentralisation/>.

Persons with Disabilities, the Convention Against Torture and Other Cruel Inhuman or Degrading Treatment or Punishment, International Covenant on Civil and Political Rights, the International Convention on the Elimination of All forms of Racial Discrimination, as well as the International Covenant on Economic, Social and Cultural Rights. The FGS has also signed, but not ratified, the regional 1969 Convention Governing the Specific Aspects of Refugee Problems in Africa (OAU Convention).

20. The Presidential Decree No. 25 (1984) on Determination of Refugee Status established an Eligibility Committee for Refugee Status Determination (RSD), but it has been inactive at the national level for many years. Somaliland agreed to be bound by international treaties endorsed by Somalia before 1991. The Somaliland National Displacement and Refugee Agency (NDRA) has enacted and is gearing for implementation of the Refugees and Asylum Seekers Act (Law No. 103/2023) of 2023 and Puntland the progressive Refugee Protection Act of 2017. The FGS, Somaliland and Puntland authorities recognise refugee status accorded by UNHCR, which conducts first instance RSD and appeals.
21. Access to asylum and the right to appeal is for the most part respected in Somalia. Yemenis (and Syrians and Palestinians in Somaliland) are accorded refugee status on a prima facie basis. All other nationalities in each region are required to undergo individual RSD. The status and treatment of RSD is governed by a patchwork of different laws and structures depending on location in the country. This makes the enactment and implementation of the Refugees Act an even more important priority for UNHCR Somalia.
22. In 2017, the FGS signed the Djibouti Declaration of the Intergovernmental Authority on Development (IGAD) to facilitate the inclusion of refugees and returnees into the national education system. Its operationalisation is challenging since access to education is limited generally in Somalia. The FGS has developed additional legislation aligned with the objectives of the Global Compact for Refugees, and it has enacted the National Eviction Guidelines, National Policy on Refugee-Returnees and IDPs and the National Housing, Land, and Property Interim Protocol in November 2019.
23. Somalia deposited the African Union (AU) Convention for the Protection and Assistance of IDPs in Africa (Kampala Convention<sup>17</sup>) in March 2020 with the AU. The Convention is the world's only binding continent-wide treaty to protect IDPs. It gives the non-binding 1998 UN Guiding Principles on Internal Displacement the force of law, specifying state obligations to prevent, protect and assist IDPs.<sup>18</sup>

## SOCIO-ECONOMIC CONTEXT

24. Recurrent droughts, flooding, and climate-induced displacement are major issues. The 2023 El Niño floods were particularly devastating, affecting IDPs and rural communities reliant on agriculture. Somalia ranks high on global disaster indices<sup>19</sup>, emphasizing the need for climate resilience measures.
25. The GDP growth rate has shown resilience, beginning with a 2.9% growth in 2020, slightly increasing to 3.2% in 2021, and then adjusting to 2.4% in 2022,<sup>20</sup> reflecting the challenges of post-pandemic recovery as well as the historic drought. By 2023, GDP growth reached 3.1%,

<sup>17</sup> The African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) adopted in 2009 in Kampala (Uganda) is the first regional legally binding instrument in the world to impose obligations on states with respect to the protection and assistance of Internally Displaced Persons (IDPs). The African Union Convention on the Protection and Assistance of Internally Displaced Persons in Africa (commonly known as the Kampala Convention) should not be confused with the Kampala Declaration on Refugees. They are two distinct instruments within the framework of African governance of displacement. They differ significantly in terms of legal status, scope, population covered, obligations and purpose.

<sup>18</sup> UNHCR Multi-Year Multi-Partner Protection and Solutions Strategy 2023-2025.

<sup>19</sup> For example N°14 in the World Risk Report 2024, Ruhr Universität Bochum.

<sup>20</sup> World Bank data, <https://data.worldbank.org/country/somalia>.



and it is projected to increase to 3.7% by the end of 2024.<sup>21</sup> GDP per capita has similarly shown improvement, with estimates rising from around US\$592.1 in 2022 to approximately US\$643.8 in 2023, and projections suggest it may reach US\$775 by 2024.<sup>22</sup>

26. This does not reflect the existence of significant pockets of vulnerability. The Norwegian Refugee Council (NRC) highlights that the climate crisis has intensified vulnerabilities for Somali communities, especially in rural areas where agricultural livelihoods are threatened<sup>23</sup>. The prolonged effects of five consecutive failed rainy seasons resulted in severe droughts, leading to a humanitarian emergency in 2023 where nearly 5 million people experienced acute food insecurity.<sup>24</sup> According to the Integrated Food Security Phase Classification (IPC), in 2024 “despite improvements, almost 1 in 5 Somalis face high levels of acute food insecurity”.<sup>25</sup>
27. The Somali economy remains heavily reliant on remittances from its diaspora, which constituted around 16.7% of GDP in 2022, decreasing slightly to 14.9% in 2023.<sup>26</sup> Infrastructure remains a critical area for development. As of 2021, only about 49.3% of the population had access to electricity, with limited improvement in the subsequent years, restricting opportunities for broader economic expansion, especially in manufacturing and technology. Additionally, access to internet and digital services remains low, with only 2% of the population online as of the latest data.<sup>27</sup>
28. Somalia has one of the highest urbanization rates in the region with at least 6.83 (40-45%) million settled in urban areas out of the 16-18 million total population, and an additional 4 million expected by 2025. In Somaliland, urbanization is greater, with an estimated rate standing at 53% for the year 2023.<sup>28</sup> At the same time, pastoralism remains a crucial livelihood for the majority of households in Somalia, especially outside of major urban centres but also around large cities and in peri-urban areas. Many individuals may also transition between rural and urban areas, blurring the lines between these population categories.
29. According to the UNHCR<sup>29</sup> Protection and Solutions Monitoring Network (PSMN), there have been a total of 6,277,324 IDPs between 1 October 2020 - 1 October 2024. An analysis of numbers provided by UNHCR depicts a growing trend of IDPs.<sup>30</sup>
  - From January 2020 to January 2021, 1.336 million IDPs (reported on arrival) were counted. The major reason given for displacement was flooding (about 70%), whilst conflict was the second highest reason at about 15%. The major destinations for IDPs were Lower Shabelle and Hiraan.
  - In 2021 the number of IDPs reporting on arrival was reduced, numbering 874,608. Conflict was the prevailing factor (65%), drought the second highest (at about 25%). Banadir and Galgaduud were the major hubs of migration.
  - IDPs numbers reporting on arrival surged in 2022 reaching 1,820,000. Drought was identified as the major reason for movement (about 60%) whilst conflict comprised the other 40%. Banadir and Hiraan were the major hubs of migration.

<sup>21</sup> World Bank data, <https://data.worldbank.org/country/somalia>.

<sup>22</sup> World Bank data, <https://data.worldbank.org/country/somalia>.

<sup>23</sup> NRC report, [https://stories.nrc.no/supporting-markets-while-saving-lives/index.html?\\_gl=1\\*n6iym6\\*\\_gcl\\_au\\*MTI3MjMxMTM5Mi4xNzU5ODQ1](https://stories.nrc.no/supporting-markets-while-saving-lives/index.html?_gl=1*n6iym6*_gcl_au*MTI3MjMxMTM5Mi4xNzU5ODQ1).

<sup>24</sup> Norwegian Refugee Council, "Displacement in the Horn of Africa: A Climate Crisis," NRC Report, 2024.

<sup>25</sup> IPC, <https://www.ipcinfo.org/ipc-country-analysis/details-map/en/c/1156834/?iso3=SOM>

<sup>26</sup> Personal remittances, received (% of GDP) Somalia, \*  
<https://data.worldbank.org/indicator/BX.TRF.PWKR.DT.GD.ZS?locations=SO>

<sup>27</sup> Ibid.

<sup>28</sup> UN Habitat, <https://unhabitat.org/somalia>.

<sup>29</sup> UNHCR Protection and Return Monitoring Network (PRMN) Dashboard: PRMN Dashboard.

<sup>30</sup> UNHCR PRM Dashboard: PRMN Dashboard.

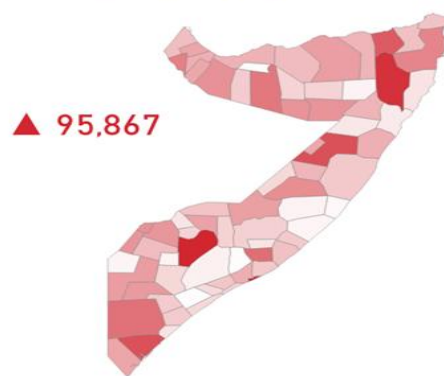
- In 2023 there were 2,949,454 IDPs reporting on arrival, close to 60% declared that the cause of movement was due to flooding, 20% conflict and nearly 20% due to drought. Gedo and Hiraan were the major hubs of destination.

30. These forcibly displaced Somalis are living in over 3,700 spontaneous informal settlements, with limited or no access to services and humanitarian assistance, and inadequate shelters. Eighty percent of these informal settlements are located on private land. These arrangements trigger constant eviction threats or actual evictions, land grabbing and other Housing, Land, and Property (HLP) risks, affecting high numbers of women, children, older persons, people living with disabilities and persons with specific needs.

31. Continued protection risks, reflecting decades of conflict and violence, recurrent natural disasters are being exacerbated and further entrenched, while access to services and assistance remedies is decreasing. 3,900,000 people are estimated to need protection, given the severe HLP violations, such as forced evictions, that continue to be reported, inadequate shelter and housing is also increasing women and girls risks of being confronted by GBV.

32. Recent data provided by IOM depicts displacement in late 2024 as growing, notably in the Baydhaba, Qardho and Galkayo districts (see figure 3 above), IDPs are projected to continue to emigrate or remain in the various settlements within the districts of Banadir (increase from 1,089,777 to 1,107,297) and Baydhaba (increase from 738,462 to 744,284)<sup>31</sup> that remain the top two destinations of choice with the highest intra-district movement.<sup>32</sup> Though flooding continued to affect IDPs in 2024, the number affected by this hazard is projected to be reduced whilst conflict and drought will increase displacement.<sup>33</sup> In March 2024, there were an estimated 38,867 refugees.<sup>34</sup>

**FIGURE 3: DISPLACEMENT PROJECTIONS Q4 2024**



Source: International Organisation for Migration (IOM), Somalia Movement Displacement dashboard. The source document does not provide a key for the exact scale behind the colours. The intense colour indicates districts with the highest intensity of arrivals, while the lighter colour indicates lower intensity of arrivals.

## International Response

33. In 2024, the UN Assistance Mission in Somalia (UNSOM) was scheduled to support the drawdown of African Union Transition Mission in Somalia (ATMIS) forces and, at the request of the FGS, for UNSOM to leave the rump of its role to the UN Country Team under the leadership of a UN Resident and Humanitarian Coordinator. The UNSOM<sup>35</sup> closed its operations on 31st October 2024 and was succeeded by the UN Transitional Assistance Mission in Somalia (UNTAMIS) on November 1st, 2024, in line with the UN Security Council's

<sup>31</sup> IOM Somalia Movement Displacement dashboard, <https://app.powerbi.com/view?r=eyJrJoiNzFiNjE2NzYtOWI1OS00Y2MzLWI3NmQtMzI0MGRhNjY4ODgyliwidCI6IjE1ODgyNjJkLTlzMitNDNiNC1iZDZILWJjZTQ5YzhINjE4NiIsImMiOj9>

<sup>32</sup> IOM Somalia Movement Displacement dashboard, <https://app.powerbi.com/view?r=eyJrJoiNzFiNjE2NzYtOWI1OS00Y2MzLWI3NmQtMzI0MGRhNjY4ODgyliwidCI6IjE1ODgyNjJkLTlzMitNDNiNC1iZDZILWJjZTQ5YzhINjE4NiIsImMiOj9>

<sup>33</sup> IOM Somalia Movement Displacement dashboard, <https://app.powerbi.com/view?r=eyJrJoiNzFiNjE2NzYtOWI1OS00Y2MzLWI3NmQtMzI0MGRhNjY4ODgyliwidCI6IjE1ODgyNjJkLTlzMitNDNiNC1iZDZILWJjZTQ5YzhINjE4NiIsImMiOj9>

<sup>34</sup> Ibid.

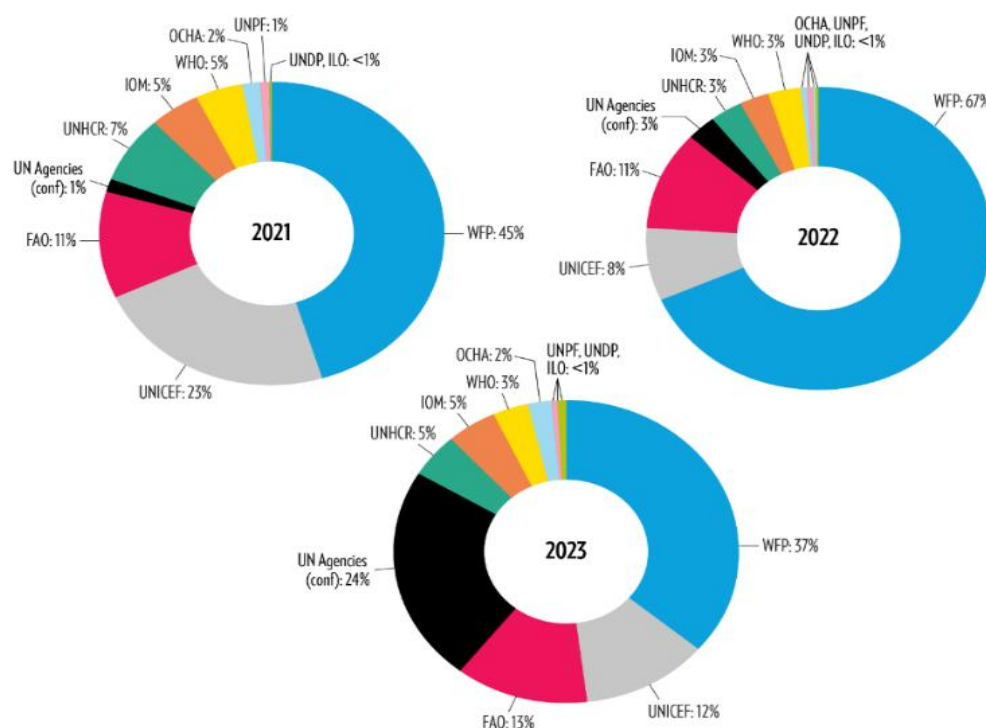
<sup>35</sup> The United Nations Assistance Mission in Somalia (UNSOM) was established on 3 June 2013 by UN Security Council Resolution 2102, following a comprehensive assessment of the United Nations in support of the establishment of the FGS. It closed its operations on 31 October 2024, and was succeeded by the UN Transitional Assistance Mission in Somalia (UNTAMIS) as of Friday, 1 November 2024.

resolution 2753/137. Similarly for the African Union, in March 2022, the African Union Mission in Somalia (AMISOM) was replaced by the African Union Transition Mission in Somalia (ATMIS), the largest African Union mission at the time. A drawdown of ATMIS reduced the force from 19,000 to 9,600 personnel at the end of 2024. There are open questions about the draw-down's impact and potential funding of alternative options amidst a rise in political tensions between Somalia and Ethiopia.<sup>36</sup>

34. In 2022, the UN was the second-largest recipient of humanitarian funding in Somalia, underscoring donor reliance on UN structures to deliver essential services and aid.<sup>37</sup> The UN employs a multi-dimensional approach to link emergency responses, stabilization, and long-term governance efforts.

35. The Inter-Agency Humanitarian Evaluation (IAHE) commissioned by the Inter-Agency Standing Committee to assess the system-wide scale up and response to the 2023 drought<sup>38</sup> notes that some helpful links between development and humanitarian interventions were made under the Somalia Humanitarian Needs and Response Plans for 2022 and 2023, for example through adaptive social safety nets and analytical contributions. Funding figures (see figure 4 below) indicate that UNHCR was one of the smaller agencies on the ground.<sup>39</sup>

**FIGURE 4: SHARE OF FUNDING RECEIVED BY LARGEST RECIPIENTS (2021-2023)**



Source: FTS data as quoted in the Inter-Agency Humanitarian Evaluation (IAHE), Steets et al.

36. The Deputy Special Representative of the Secretary-General is also the Resident and Humanitarian Coordinator (DSRSG/RC/HC) who is mandated to lead nexus coordination in Somalia, facilitating agreement among UN agencies and partners on high-level priorities and integrated planning. This makes the role quite central to UNHCR.

<sup>36</sup> See <https://amaniafrica-et.org/briefing-on-the-situation-in-somalia-atmis/>.

<sup>37</sup> FTS, UN OCHA, <https://fts.unocha.org/plans/1063/summary>.

<sup>38</sup> Inter-Agency Humanitarian Evaluation (IAHE), Commissioned by the Inter-Agency Standing Committee, Steets et al, March 2025.

<sup>39</sup> See section Adaptation to the funding environment.

37. The 2024 Humanitarian Needs and Response Plan (HNRP) states that: “The current drought and risk of famine in most parts of Somalia have revealed the importance of agile programme management to quickly respond to rapid contextual challenges. The HNRP hence seeks to align with relevant resilience and durable solutions frameworks, with the aim to reduce humanitarian needs, risks, and vulnerabilities in the medium to longer term”.

## Brief overview of UNHCR in Somalia

38. UNHCR has provided protection and assistance to forcibly displaced people in Somalia since the 1980s and pursued durable solutions for refugees entering Somalia and IDPs. This includes access to RSD procedures, the provision of emergency shelter, CRIs to fulfil basic household needs, the management and coordination of camps, and Gender Based Violence (GBV) services, among others, with a central role given to protection. It has supported a relatively stable number of some 40,000 refugees since 2019 and contributes to support IDPs and vulnerable groups in first line response, as per the agreed multi-agency framework. Somalia was one of the first countries in which the cluster approach to humanitarian coordination was activated following its global introduction in 2005. Since then, a complex and dense coordination structure has evolved in which UNHCR has engaged actively.

39. The Country Office is based in the Green Zone in Mogadishu, while between 2019 and 2024 there have been on average three Sub-Offices (Hargeisa, Galkayo, and Mogadishu) and nine Field Offices and Field Units. UNHCR's work in Somalia for the period 2020-2022 followed an annual planning process, with an operational plan for, respectively, 2020 and 2021 and an interim strategy for 2022. In 2023, a UNHCR Somalia Multi-Year Strategic Plan 2023-2025 was adopted for the first time. This period was affected by several corporate reforms:

- A regionalisation and decentralisation reform, launched in 2019, aimed to bring decision-making closer to implementation, in particular by strengthening country operations through increased decision-making power.
- A shift in the structure and approach to UNHCR's strategic planning and budgeting to align more closely with the principles of the Global Compact on Refugees (GCR). Since 2022, multi-year country strategies have been adopted for the first time in the organisation and, since 2023, in Somalia.
- The roll-out of different platforms and technologies as part of the UNHCR Business Transformation Process, including the adoption of COMPASS<sup>40</sup> as the new results monitoring framework and an essential tool for multi-annual strategic planning.

40. In Somalia, these corporate reforms have been gradually implemented during the period covered by the evaluation. UNHCR's global budget constraints are reflected in the constant decrease of UNHCR Somalia's operating level (OL) budget.<sup>41</sup> In this context, UNHCR prepared in 2024 an internal corporate-level note to guide operations on how to rationalise the use of resources, optimise field presence and maximizing the impact of resources.<sup>42</sup>

41. A significant aspect of UNHCR's work in Somalia takes place through its engagement with partners. At the UN Country Team (UNCT) level this takes place through the clusters and assorted Working Groups. The UNCT, for example developed guidance for delivering an

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<sup>40</sup> COMPASS is a digital system that uses a results-based management (RBM) approach for its multi-year planning and programming. According to this approach, UNHCR's programme cycle has three main phases – PLAN for, GET and SHOW Results – aligned to the UNHCR Strategic Directions 2022-2026 and the objectives of the Global Compact on Refugees.

<sup>41</sup> See budget analysis in section fit-for-purpose for more details.

<sup>42</sup> 'Operationalizing UNHCR's corporate programming priorities: Sustainable Responses, the Route-Based Approach and the Focus Areas. An explainer for UNHCR operations', 2024.

integrated response to the 2021-2023 drought. In Somalia, UNHCR operates within the UN system through three clusters:

- **Protection cluster:** UNHCR led the development of the protection cluster response strategy.<sup>43</sup> The protection response plan for 2024 is anchored on four strategic pillars: 1) protection of civilians, 2) response prioritization, 3) integrated approaches across sectors, and 4) operationalization of frontline protection responses. With each of these pillars, the protection cluster seeks to ensure the centrality of protection across the humanitarian response in Somalia. UNHCR also plays a role in first line response, as per the agreed multi-agency framework. This includes a number of protection activities that align with Protection cluster priorities.
- **Camp Coordination and Camp Management (CCCM) cluster Somalia:**<sup>44</sup> The CCCM cluster strategy notes that the cluster was activated in May 2017, under the co-leadership of UNHCR and IOM, to respond to growing displacement and critical coordination needs in IDP sites. Its key priority at the time was to improve coordination through harmonized integrated multi-sectorial response at site level and to increase the quality of interventions. CCCM cluster's key role is to provide disaggregated data on forcibly displaced populations to inform responses. The cluster is also tasked with ensuring adequate linkages with national authorities and key stakeholders' capacities. An addendum<sup>45</sup> to the CCCM strategy provides a strategy for adaptation from the previous site-based approach to an area-based approach.<sup>46</sup>
- **Shelter cluster:** The shelter cluster strategy is dated 2020. More recent documents refer to Terms of Reference (ToR) for Technical Working Groups under the cluster: one for emergency shelter and one for sustainable shelter.

42. At the end of 2024, the UNHCR Somalia operation intended to progressively transition from traditional care and maintenance programmes to inclusive solutions-oriented approaches, aiming to progressively transfer services to relevant actors at the federal and state levels. A significant shift had been taking place in relation to work with partners in Somalia. This began before the evaluation period and is driven by the gradually reducing level of funding (see figure 5 below). This reflects the overall situation of available budget<sup>47</sup> and is as pronounced as that for the OL figures since 2020. The Implementation Programme Management Committee (IPMC) meeting minutes make multiple references to the need to reduce the number of partnerships, for example in Galkayo. This priority is at odds with the notion of decentralisation. Financially, the reduction in the overall budget applies to all partners, with significant differences depending on the type of partner. However, in relative terms, the percentage of the OPS budget (OL), implemented through partners, has remained stable, representing 60% in 2021 and 61% in 2024.

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<sup>43</sup> Protection Cluster, "Somalia - Protection cluster 2024 Response Strategy," United Nations Office for the Coordination of Humanitarian Affairs (OCHA), 2024.

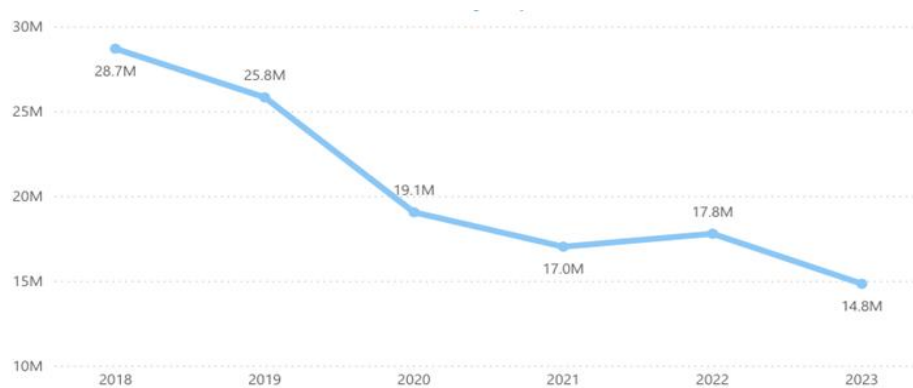
<sup>44</sup> Somalia | CCCM cluster.

<sup>45</sup> Somalia's CCCM Cluster Area-Based Approach.

<sup>46</sup> CCCM Cluster Somalia Strategy: A site-based approach focuses on individual IDP sites or camps and is effective in settings where IDPs are concentrated in defined locations, allowing for targeted interventions. An area-based approach extends beyond individual sites to encompass a broader geographic area, which may include multiple IDP sites and host communities. This approach is particularly useful in urban or peri-urban settings where displacement is dispersed, and the boundaries between IDP sites and host communities are less distinct.

<sup>47</sup> See section fit-for-purpose and Desk review report for more details.

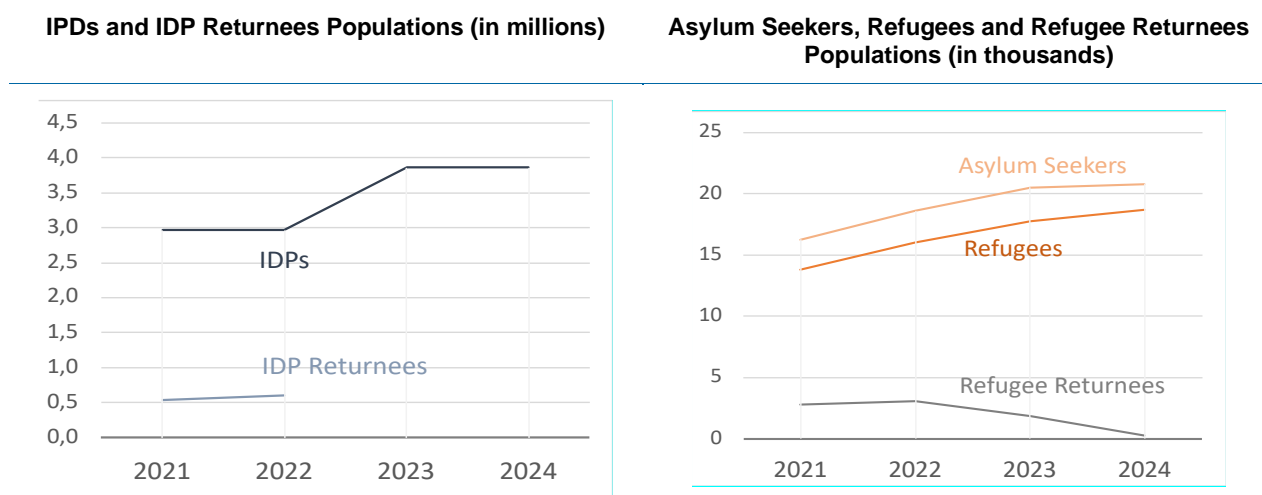
**FIGURE 5: EVOLUTION OF OVERALL PARTNER BUDGET/YEAR**



Source: UNHCR Somalia internal documents

43. This shift was to prioritise sustainable responses that maximise efficiencies and rationalise programmatic interventions, ensuring more resources are allocated directly to beneficiary services. The population planning figures are presented below (see figure 6 below).

**FIGURE 6: EVOLUTION OF POPULATION GROUPS IN SOMALIA - 2021-2024**



Source: UNHCR Refugee data finder (2021-2024) As the data made available to the evaluation team (SOM - Annual Statistical Report 2021-2022) only covers the period 2021-2022, the data presented here has been taken from the UNHCR Refugee Data Finder website. Data on Returnees is only available up to 2022.



## 3. FINDINGS

### EQ1. Relevance to the Context, Policies and Needs

UNHCR's operation in Somalia reflects the operational context, needs, and governmental priorities to some extent. Its programmes align with Somalia's National Development Plan, and regional and global policies and commitments. The organisation's evolving strategic position reflects an intent to transition from emergency relief to more sustainable, solutions-oriented programming.

While needs have been estimated regularly through assessments, inconsistent monitoring systems and fragmented data collection undermined the ability to measure outcomes effectively. Contradictory results from different monitoring frameworks (RMS vs. operational reporting) highlight gaps in data credibility. These issues are compounded by competition among UN agencies for data ownership.

UNHCR's use of strategic direction from the CO in Mogadishu to sub- and field-offices to navigate local political complexities gives it the necessary independence, though this is not always accepted by state counterparts, for example in Somaliland.

UNHCR has made an effort to adopt conflict and climate sensitive approaches. However, aid distribution has contributed to urbanisation that has fed tensions and vulnerability, and that has been accompanied by detrimental environmental impact. Furthermore, assistance provided in urban areas has been at the expense of support to IDPs in rural areas where needs are also immense. Localisation initiatives like Area-Based Coordination have enhanced relevance but face structural obstacles in ensuring consistent knowledge transfer through UN coordination.

#### ALIGNMENT AND ADAPTABILITY

44. **The evaluation finds that global and regional frameworks as well as national and sub-national plans and agreements have been taken fully into account across UNHCR's programmes. The Somalia National Development Plan, related action plans, regional and sub-national agreements have served as references to frame UNHCR's programme strategy and design.**<sup>48</sup> During the period under evaluation, there have been significant shifts at the global level in UNHCR's approach to refugee response and management, echoed in UNHCR's Strategic Directions (2020 – 2025). These are reflected in a clear visible strategic move towards locally led and longer-term/durable solutions including for IDPs. In this context, a Sustainable Programming Note (2024) and a subsequent Explainer for UNHCR Operations<sup>49</sup> were developed to support a move towards minimising dependency on humanitarian assistance, allocating more funding to promote inclusion, integration and longer-term solutions, including voluntary return. As the current footprint of programming has been less focused on self-reliance, this is not yet reflected in budgetary priorities notably the OL budget,<sup>50</sup>

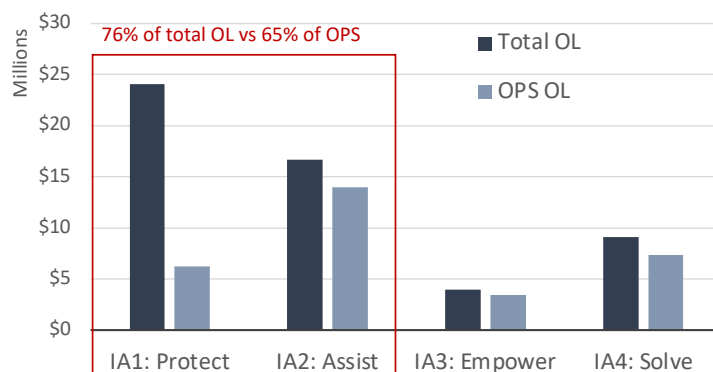
<sup>48</sup> See desk review report for more details.

<sup>49</sup> Operationalizing UNHCR's corporate programming priorities: Sustainable Responses, the Route-Based Approach and the Focus Areas – UNHCR 2024.

<sup>50</sup> The operating level (OL) spending authority is split between three non-fungible budget categories: staff (identified as "STAFF"), operations (identified as "OPS") and support and administrative expenses (identified as "Administrative Budget and Obligations Document" (ABOD)). Source: UNHCR Financial report and audited financial statements for the year ended 31 December 2023 and Report of the Board of Auditors, General Assembly.

where in 2024, 76% of the total budget was going to Protect and Assist impact areas, as shown in figure 7 below (acknowledging that this is not to be read in absolute terms, as protection may include livelihoods).

**FIGURE 7: TOTAL OL AND OL-OPS BUDGET LINE BY IMPACT AREA IN 2024 (LAST AVAILABLE DATA)**



Source: UNHCR: Compass data OP OL 2022-2024 - Somalia financial data\_2020-2023 (updated with UNHCR data provided on February 11<sup>th</sup>, 2025).

45. UNHCR Somalia's planning documents (annual plans 2020 and 2021, interim strategy 2022 and multi-year strategy 2023 - 2025) reflect the GCR, including the Comprehensive Refugee Response Framework. These align with principles of a Sustainable Response and the 2019 Policy on Engagement in Situations of Internal Displacement and prepares it for 'Implementing the IDP Focus Area Strategic Plan - A guide for operations', which at the time of the evaluation were to be implemented in 2025.

46. UNHCR Somalia's Multi Year Strategy 2023 – 2025 makes references to 19 national and sub-national policy frameworks,<sup>51</sup> which likewise align with the aforementioned global and regional frameworks. Of particular relevance to frame the UNHCR MYS 2023-2025 are the Ninth Somalia National Development Plan (2020 – 2024), the Somalia National Durable Solutions Strategy and the Somalia National Action Plan to End Statelessness, the Refugee Act (endorsed Feb 2024) and the draft Somali IDP Act.

47. **UNHCR's Country Office (CO) senior management has limited room for manoeuvre in terms of adapting strategies or priorities.** The organisation's normative frame is a constant and challenging constraint on operational decisions. UNHCR CO is hemmed in by multiple strands of accountability, by interdependency with the collective humanitarian and development response architectures, and legacy arrangements. These can be summarised as follows:

- *Accountability to donors and pooled funding mechanisms.*<sup>52</sup> The funding, which UNHCR receives is typically earmarked, for example in 2024, 92% of US\$54 million received was softly to tightly earmarked. Generally, most earmarked funding is time-bound and has a geographic specificity. The United States restrictions imposed on the humanitarian and development sectors in early 2025 have further constrained strategic and operational manoeuvring and capacity.
- *Accountability to the Inter-Agency Standing Committee (IASC) and UN's role as a member of the UNCT.* As a mandate-driven agency, UNHCR actively contributes to the

<sup>51</sup> See Evaluation Desk Report, which include also Somaliland.

<sup>52</sup> For example, UN Somalia Joint Fund.

joint UN response mechanisms, such as the IASC-based and OCHA-coordinated system of needs assessments and response prioritisation.

- *Accountability to global, regional, national and state level commitments.* UNHCR has committed to multiple, multi-party and/or bilateral agreements at a variety of levels. Any iteration of UNHCR management tests limits due to the need to coordinate with state authorities. In particular, UNHCR faces a complex political landscape in Somaliland, which is actively navigating its self-proclaimed independence and aiming to meet its institutional commitments on its own terms.
- *Legacy of previous management decisions associated with HR, resource allocations and strategic manoeuvring.* Senior management cannot start afresh every year, they inherit a staff and field footprint and associated costs from previous decision-makers. Wholesale variation from the existing path requires considerable credibility and significant effort, which is made all the more difficult by the prevalence of clan considerations among staff.

48. **The fact that UNHCR operation is dependent on the collaboration of highly fragmented state counterparts, some of which are in effect opposed to the others, is a significant source of difficulty.** For example, as described by respondents, since October 2024, UNHCR has been transitioning the refugee status determination role to the Somaliland government, with a committee established to support the process. However, the discrepancy between refugee laws in Mogadishu and Hargeisa leads to inconsistencies in implementation, hindering access to benefits for specific groups. Another challenge in Somaliland is the lack of clear by-laws in government institutions regarding the handling of refugees. For example, the Immigration authorities and the National Displacement and Refugee Agency (NDRA) do not agree on the definition of a refugee as the government lacks a refugee determination law, and NDRA relies on UNHCR's definition.<sup>53</sup> As a result, a full and formal transition is yet to take place.

49. The same dependencies exist between programming and counterpart support required by state structures. Respondents from different organisations describe how some of UNHCR's investments such as the permanent housing in Adado are not fully utilised due to the government's inability to provide the required services. As a result, in the two-room permanent housing project in Adado aiming to establish 117 houses with 78 already built, only 57 are occupied by beneficiaries. The remoteness of the housing location means that Galmudug Commission for Refugees and IDPs (GCRI) believes only 80% of the houses will eventually be occupied. Contrary to UNHCR guidelines the sites lack security services, and market access.

50. This complicated environment, which also includes the payment of stipends to official counterparts, has been met with great adaptability and resourcefulness at the sub- and field office level. UNHCR has, for example successfully adapted its operations in Galkayo, an area with two administrations (Puntland and Galmudug), by establishing a close collaboration with both authorities. These partnerships have enhanced programme implementation by providing access to critical information and locations. For example, in 2024, UNHCR partnered with Galmudug Commission for Refugees and IDPs (GCRI) and the Puntland Ministry of Planning and Internal Affairs to ensure that emergency aid is delivered to those in need.<sup>54</sup>

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<sup>53</sup> There are distinct applicable refugee laws, the Federal Republic of Somalia Refugees and Asylum Seekers Act 2024 applicable in all other Federal States and the Refugees and Asylum Seekers Act, Law No.103/2023 applicable in Somaliland. However, the distinct laws do not disfavour any specific groups.

<sup>54</sup> UNHCR's Sub-Office Galkayo has maintained a partnership with the Ministry of Interior, Federal Affairs, and Democratisation (MolFAD) for over a decade and with the GCRI for approximately seven years. The collaboration has been important in enhancing humanitarian response, strengthening protection efforts, and supporting sustainable solutions for displaced populations.

51. **The presence of dual administrations complicates considerably the ability of the organization to respond to needs.** Incidents, such as conflicting claims over territory, have delayed assessment reports and hindered timely response efforts. This was the case, for example for recent clan fighting in the Adado area. Stakeholders have indicated that avoiding affiliation with either administration has been necessary in this scenario to facilitate operations in some instances.
52. Constantly updating its knowledge of local security and political dynamics, UNHCR maintains a priority of collaborative relations with local authorities. UNHCR policy vision to maintain a focus on both federal and central state level authorities, comes at a cost in Somalia. Protection officers and protection case workers employed by one of UNHCRs largest partners have complained to the evaluators that this means, decisions are made, for example at the Garowe level, the state capital in Puntland, while UNHCR sub-office staff in Galkayo, responsible for the operation in the area, are given limited decision-making authority. Similarly, the National Commission for Refugees and Internally Displaced Persons (NCRI) at the FGS level has expressed dissatisfaction with UNHCR's decentralised approach to establishing collaborative agreements at the FMS level. NCRI advocates for the establishment of a unified framework that would allow for comprehensive agreements. This perspective is not universally accepted among the FMS-level commissions, such as the JUCRI and the SWSCRI. This goes further in Dollow, where the District Commissioner's Office rejects the authority of JUCRI in Kismayo.

*We don't accept, endorse, consider, agree that our partnership agreement with UNHCR to be through NCRI, because we don't trust them, and it will involve unnecessary bureaucracy, which may derail our activities. Any agreement with a Mogadishu-based authority can easily be weaponized, when there is any political disagreement between FGS and FMS. Such a scenario will jeopardise our ability to coordinate with UNHCR and work for displaced populations.*

*Quote, member of Jubaland Commission for Refugees and IDPs (JUCRI) and Southwest State Commission for Refugees and IDPs (SWSCRI) – in Kismayo and Baidoa respectively*

## USE OF EVIDENCE

53. **UNHCR's programme design and implementation are based on various assessments and surveys,<sup>55</sup> which have serious limitations in serving the intended purpose of measuring needs, monitoring results and supporting decision-making.** UNHCR has invested more than US\$5 million in third-party and protection monitoring through two implementing partners, with poor results and risks highlighted by the Office of Internal Oversight Services (OIOS) in 2019 and reiterated in 2024.<sup>56</sup> Although partners play a fundamental role in the analysis, and monitoring of needs, OIOS audits and the evaluation have documented that the quality of planning and reporting has been inconsistent. However, in UNHCR's Management response to the 2024 audit, UNHCR commits to implementing a new data collection methodology and selecting a new third-party monitoring partner in 2025. Other corporate tools for needs analysis, monitoring results and accountability have been applied more consistently. Under the framework of corporate policy on accountability to affected people,<sup>57</sup> UNHCR organises participatory assessments<sup>58</sup> with forcibly displaced and

<sup>55</sup> These include but are not limited to rapid assessments jointly carried out with partners, sectoral evaluations, participatory assessments, post-distribution monitoring, RMSs, third-party monitoring, among others.

<sup>56</sup> OIOS internal audit division, Report 2024/01902. Audit of the operations in Somalia for the UNHCR.

<sup>57</sup> UNHCR operational guidance on accountability to affected people (AAP 2020).

<sup>58</sup> See specific analysis of the participatory assessments in the Desk review. Participatory assessments were conducted in 2022 and 2023 in the Mogadishu, Galkayo and Hargeisa Sub-Offices and included focus group discussions and key informant interviews with participants from selected locations covered by each Sub-Office. Purposive sampling and representative group composition were used to select participants to ensure adequate representation in terms of age,

people at risk of stateless<sup>59</sup> in prioritised communities to establish their perceptions of assistance received, emerging needs and recommendations in relation to UNHCR's work. Similarly, UNHCR has regularly conducted post-distribution monitoring (PDM) surveys of humanitarian assistance (mainly CBI and CRI) to verify the usefulness of the assistance in selected populations with which UNHCR works.<sup>60</sup> Reiterated year after year, these studies identify the critical needs of communities (food, shelter and livelihoods), which have been reflected in programming. The assistance mirrors PDM findings across Somalia indicating a strong community preference for cash-based interventions, or, alternatively, mixed-modality assistance, combining CBIs with critical in-kind support, particularly shelter materials such as plastic tarpaulins, and solar lamps.

**54. These assessments are considerably hampered by the difficult environment of Somalia.**

While UNHCR's planning aligns with government priorities, including Somalia's National Development Plan and the National Durable Solutions Strategy, it is difficult to see how government strategies have influenced operational prioritisation on the ground. Challenges such as security restrictions and fragmented data collection, as well as inflated figures,<sup>61</sup> hinder a comprehensive assessment. Insecurity has also undeniably posed a severe constraint on accessing communities. This is due in part to excessive risk aversion on the part of the UN Security Management System. UNHCR staff in all field locations express a high degree of frustration about it, which is also echoed in other evaluations, such as the IAHE. The observations of the evaluation team during site visits concur that the security management guidelines create hard to justify barriers and costs.<sup>62</sup> Every departure from UNHCR's secure office and residential compounds, for example is complex to organise and expensive, requiring multiple armoured vehicles and armed escorts. This has greatly inhibited UNHCR's ability to engage with FDP and hosts.

55. The limitations on movement have been especially prohibitive when it comes to 'hard to reach areas' where low profile approaches (lightly equipped visits with the ability to engage with all stakeholders) are prerequisites. For example, the absence of a physical presence in Galmudug from the Galkayo office creates a significant information gap for sub-office staff, in spite of strenuous efforts to position personnel in Dhusamareb.

56. Some constraints are internal to UNHCR. UNHCR's operational strategic visions for the period covered by the evaluation established in, respectively, two operational strategies and two operational plans, do not easily align with field realities where a focus on activities and immediate outputs prevail. The evaluation observed that the manner in which tasks are defined by personnel in their everyday work tends to revolve entirely around the lines of activity, they are asked to conduct, with knowledge of others, while time for senior level programme overview is absorbed by coordination efforts with partners. Theory of Change workshops similarly demonstrated a clear identification of outputs, but no particular visioning and strategic focus for the organisation. Senior Management respondents in this evaluation confirm that this output driven management of the CO makes it difficult to carry out a strategic realignment to needs as well as to the changing donor environment.

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gender, nationality, religious/ethnic background and inclusion of persons with special needs. Detailed quantitative data on sampling are not available in the participatory evaluation reports.

<sup>59</sup> The FGS National Action Plan to End Statelessness in Somalia 2021 - 2024 describes the difficulty to quantify the problem of statelessness due to 'the lack of data on the populations at risk of statelessness, and the reasons why they are at risk', while also describing the prevalent conditions which mean that there are persons with this status in the country. UNHCR has identified 125 cases.

<sup>60</sup> PDMs have been conducted mainly in Adado, Baidoa, Banadir, Beletweyne, Ceelbur, Dhoble, Kismayo-Luglow, Kismayu, Lasanod, Sool, Sanag, Togheer, Marodijeh and Yagoor. The majority of surveys show high response rates (over 90%), 95% confidence level and confidence interval (margin of error) of 5.

<sup>61</sup> This is aptly analysed in the IAHE Evaluation pages 75 and following. It includes in particular the statement "Basic data about the response was hard to come by and/or questionable in its reliability."

<sup>62</sup> The IAHE dedicates two pages to this issue, in particular stating that "Humanitarian agencies have long criticised the system's restrictive security management."



- 57. The engagement in UN processes prevents UNHCR from efficiently monitoring the context and delivery of activities.** Sub-office and field office personnel consistently speak with frustration of the number of coordination meetings, which UNHCR is asked to attend – the flipside of its alignment to the aid architecture. Some respondents even made the point that the cluster coordination role implies, in fact, a full-time position. UNHCR plays a key role as part of the joint UN (IASC-based/HCT/OCHA-led) system in needs assessments and response. As part of joint efforts and in its role as ‘tri-cluster lead’, UNHCR provides inputs to annual needs assessments and prioritisation exercises such as the Humanitarian Needs and Response Plan (HNRP). In interviews, humanitarian partners do consistently perceive UNHCR staff to be well informed, and aware of political and security dynamics. This role also allows UNHCR to influence the Somalia Humanitarian Fund (SHF) and the Central Emergency Response Fund (CERF) allocations, and UNHCR’s Representative now sits on the advisory board of the Somalia Humanitarian Fund. However, UNHCR’s role requires regular commitment and consumes resources, which comes at the cost of reaching people in need.
- 58. While UNHCR plays an important role in the structured data collection systems in the clusters, there is also detrimental competition between data providers.** The CCCM cluster is co-led by UNHCR and International Organisation for Migration (IOM) Protection and Solution Monitoring Network (PSMN) at the national level and most state levels. A number of partners, including local authorities, the Danish Refugee Council (DRC), Cooperazione Internazionale (COOPI) and the IOM play lead roles in sub-state level clusters in the South-West. They provide so-called ‘stock data’ on IDP numbers, verified twice per year. Monthly joint site monitoring with local government places them at the centre of verification exercises, which are used by OCHA and some donors<sup>63</sup> for funding decisions.
- 59.** UNHCR also plays a key role in providing information for rapid responses, via the PSMN. The PSMN is a long-standing tool for ‘real-time’ protection assessment, designed to provide Flash Alerts (within 72 hours) on population movements, with an initial assessment of protection risks. In interviews, UNHCR’s staff and partners acknowledged that the PSMN had suffered from fluctuating financial support from donors and partners, which has affected its functioning and left gaps that are filled by others. Between 2019 and 2022, DRC set up the Somalia Protection Monitoring System, which is a competitor to the PSMN.
- 60.** UNHCR plays a significant role in the new Integrated First-Line Response Framework (IFLR). This uses the PSMN for the inter-agency coordination to deliver ‘a critical, quick impact and a life-saving, multi-sectorial response to the newly displaced or newly accessible<sup>64</sup> population’. The IFLR usefully maps onto the Area-Based Coordination structures.<sup>65</sup> The precise relationship between ABCs and cluster coordination was defined in late 2024 with the ToR pending HCT approval.
- 61.** The range of UNHCR’s national staff contacts across the entire country, and willingness to work by conveying information to the CO present a real potential for the creation of pools of data and even for visual modelling of the local reality. The evolution of digital technology, for example in mapping and imagery, could be tapped into enhancing the attractiveness and intelligibility of reporting, by sharing mapping dashboards between populations and Programme officers as are being developed by Swiss Development Cooperation in Somalia through their Framework for Risk and Adaptive Programming.

<sup>63</sup> Donors (ECHO was mentioned) for funding requests i.e. when a partner wants to start a Water, Sanitation, and Hygiene (WASH) project, CCCM data stating that this activity is a priority and/or sector is required.

<sup>64</sup> As per CCCM guidance and IFRL SOP’s – 2-page summary.

<sup>65</sup> A request to initiate the IFLR can be flagged by ABCs or any humanitarian partners, members of the country humanitarian coordination forum in areas where ABCs are not active. Following the request, the ABCs will establish consultation with the OC and the SICCGs with the national ICCG. OC and ICCG will determine whether a first-line response should be triggered within 24 hours of the request.



62. IOM's Displacement Tracking Matrix (DTM) also provides data on IDP numbers, in parallel with UNHCR's PSMN. DTM figures are not aligned with those of the CCCM cluster, which is confusing for the operational agencies. Although UNHCR is overall responsible for the CCCM 'stock' data, the information on numbers is provided by IOM in those cases where they play the role of camp coordinator, a gatekeeper equivalent role.

## CONFLICT AND CLIMATE SENSITIVITY

63. **UNHCR's increasing involvement in responding to climate-induced displacement at a global level is reflected in documents produced between 2022 and 2024<sup>66</sup> and has been reflected in the definition of the UNHCR Somalia Multi Year Strategy 2023 – 2025.** UNHCR Somalia's work on climate-induced displacement is consistent with recent UNHCR guidelines on Climate Change and Forced Migration and the Inter-Agency guidelines to prevent famine and mitigate severe drought conditions accelerated by the effects of climate change and conflict.

64. **UNHCR's work in Somalia demonstrates that field personnel are aware of the importance of conflict and climate sensitivity. However, contextual knowledge on displacement patterns, particularly clan-related issues, are often insufficiently transferred between staff, i.e., from national to international staff resulting in ongoing reactive operational adaptations and strategic inertia.** This is important as, through its partners, UNHCR provides emergency assistance such as cash and shelter to populations affected by conflict and climate shocks. These types of interventions, which alter the distribution of assets in communities, naturally influence local power dynamics and ownership issues. Additionally, UNHCR supports rural communities with livestock restocking as a long-term solution, rather than alternative 'light footprint' strategies such as climate-smart agriculture.<sup>67</sup> Such resource transfers and the promotion of geo-specific strategies contribute either positively or negatively to the dynamics of local conflict – for example in Somaliland by promoting small businesses - the very definition of conflict sensitivity.

65. Geo-specific interventions feed into a broader dynamic. Of particular importance here is the contribution of aid distribution to urbanisation, creation of tensions between displaced populations and residents and straining of infrastructural resources in urban areas like Baidoa and Kismayo. Meanwhile access to rural areas remains limited due to insecurity and logistical challenges, perpetuating marginalization and leaving significant gaps in humanitarian support. UNHCR's participation in ABC and localisation efforts are designed to enhance local relevance and response coordination<sup>68</sup> but face challenges in fully addressing conflict dynamics.<sup>69</sup> This is due to their reported heavy and slow management and administrative processes, including parallel and duplicative coordination structures, such as UNHCR conducting site assessments already carried out under the CCCM cluster.<sup>70</sup>

66. **While UNHCR's assistance is an important part of supporting IDPs in Somalia, it is equally important to recognize the unintended consequences of such aid on urbanization trends and community dynamics.** The cases of Baidoa and Kismayo highlight

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<sup>66</sup> UNHCR's Strategic Framework for Climate Action, UNHCR Focus Area Strategic Plan for Climate Action 2024-2030 and UNHCR Operational strategy for climate resilience and environmental sustainability 2022-2025.

<sup>67</sup> Climate smart practices are a term to describe planting trees along flood-prone areas, sustainable land management, water conservation practices, mulching, agroforestry, alternate cropping, hill-top farming around boreholes, dissemination of early crop varieties, mounds crops and changing cultivation calendar.

<sup>68</sup> The IAHE states (p74) that "Area Humanitarian Coordination Groups were set up under UN OCHA or NGO partners active in various districts and regions in December 2022. A mapping conducted by UN OCHA in late 2023 shows 21 such groups covering either regions or districts. However, since these structures were seen as little functional and effective, the HCT set up an Operations Cell to strengthen operational coordination. Among others, this put in place an additional Area-Based Coordination structure led by IOM and the DRC in 2024 in the ten priority districts identified in the humanitarian response plan to enable the area-based delivery of an integrated humanitarian response."

<sup>69</sup> "Feedback on Area Based Coordination model: A field and cluster perspective" (UNHCR internal note).

<sup>70</sup> KIs conducted in Baidoa and Kismayo.

the complexities of navigating these challenges and the need for a strategic approach that balances the needs of displaced populations with the capacity and stability of host communities. This is an existential issue for the communities, as exemplified in the quotation in the text box. By fostering inclusive partnerships and continuously evaluating the effects of its interventions, UNHCR can work towards more sustainable solutions that address the root causes of displacement while promoting stability and resilience in the region.

“No, we would not be displaced or come to Baidoa if we could get assistance in our village or the farthest, we could go is Tiyeelow town. There is no humanitarian assistance in Tiyeelow, because it is controlled by Al-Shabab. We came here by foot, walking for nine days, and we lost a child on the way” said an IDP participant in Barwaqo in Baidoa

67. The humanitarian response in Somalia faces significant limitations primarily dictated by geographic and security factors. Assistance is largely concentrated in accessible locations, predominantly urban and peri-urban areas under government control. While these locations benefit from more robust infrastructure and security, the vast rural areas (many of which are dominated by insurgent groups such as Al-Shabaab) are classified as hard-to-reach areas. Differentiating between IDPs and host communities presents a significant challenge for UNHCR and its partners. This complexity arises from the intricate dynamics of displacement and the socio-economic conditions in which these populations coexist. As displacement situations evolve, host communities often mix-up with IDPs and present themselves as IDPs too, leading to blurred lines between the two groups.<sup>71</sup> As a result, humanitarian actors encounter substantial barriers when attempting to deliver aid to populations residing in these more remote and volatile environments.
68. The assistance provided by humanitarian actors is one ‘pull-factor’ affecting urban/rural dynamics and contributing to urbanization. It is one among a few others, as violence remains the paramount factor, and environmental change a decisive one.<sup>72</sup> However, multiple studies<sup>73</sup> observe that aid intended to support vulnerable populations end up attracting them to more vulnerable circumstances. Communities, households and individuals are forced to leave their homes in most case after depleting all other options, and move to urban centres, exacerbating the challenges faced by IDPs, host communities and humanitarian actors including UNHCR. The environmental degradation in turn caused by this concentration of population is severe and easily observable, leading to tension between urbanized communities.<sup>74</sup> Several sources have documented the phenomenon of “aid-linked displacement” and examined how this influx has produced a range of unintended consequences, including increased land and housing pressures, environmental degradation, heightened social tensions, and elevated protection risks.<sup>75</sup>

<sup>71</sup> See, for example, Crawford, N., Holloway, K., Wasuge, M. et al. (2024) The lives and livelihoods of forcibly displaced people in Mogadishu, Somalia. HPG case study. London: ODI ([www.odi.org/en/publications/the-lives-and-livelihoods-of-forcibly-displaced-people-in-mogadishu-somalia](http://www.odi.org/en/publications/the-lives-and-livelihoods-of-forcibly-displaced-people-in-mogadishu-somalia)).

<sup>72</sup> See, for example: “Burning Ground: Tackling Climate Change and Conflict in South-central Somalia”, Kheira Tarif, SIPRI 2024. There is also considerable literature on the topic of Climate Security. Or: “Listening to Displacement Affected Communities Over Time” REDSS with UKAID and Danish Ministry of Foreign Affairs, which states that “Conflict and drought-related reasons remain the two most commonly reported push factors causing displacement. In addition, lack of livelihoods and job opportunities in areas of origin emerges as another considerable driver of displacement among IDP households (19% in Kismayo; 10% in Baidoa; and 1% in Mogadishu).

<sup>73</sup> For example: “The Nexus between Climate Change, Mobility, and Conflict in Somalia”, Said Abdullahi, Radhika Singh, Joyce Takaindisa, Camilla Giacomelli, Niklas Sax, Bia Carneiro, Grazia Pacillà, CGIAR 2024. Or “The Effects of Aid in Somalia: Unintended Consequences and Lessons Learned” Muktar Abdi Hussein, SIMAD University, Mogadishu.

<sup>74</sup> Burning Ground: Tackling Climate Change and Conflict in South-central Somalia”, Kheira Tarif, SIPRI 2024.

<sup>75</sup> See, for example:

Desk review.

UNCT 2025 Somalia Humanitarian Needs and Response Plan.

Muktar Abdi Hussein (2024) The Effects of Aid in Somalia: Unintended Consequences and Lessons Learned. Journal of Economic Cooperation and Development, 45, 2, 209-232

NRC, Legal Action Worldwide (Housing Land and Property Issues in Somalia: Persons of Concern in Somaliland and South-Central Somalia).

69. As a result, over the years following 2020, urban areas have become overwhelmed with recurrent waves of influx of displaced populations, straining local resources and infrastructure.<sup>76</sup> These lead to increased tensions and competition for limited services.
70. In practice, this situation leads to a scenario where humanitarian organizations often go to accessible locations, which means the population in need has to move to locations of humanitarian assistance. In other words, violence and climate-affected households and communities in rural areas are forced to move to urban areas - a move that introduces enhanced vulnerability as they are separated from their natural livelihood assets, while already grappling with the dire consequences of conflict, food insecurity, and displacement. This is what is also known as the "magnetic effect of aid".
71. One specific example of this dynamic was found in Baidoa, a district that faces unique challenges due to its territorial division among various insurgent factions and its complex clan dynamics. The presence of militarised factions creates an environment of instability and insecurity, complicating the already difficult living conditions for IDPs and exacerbating the already ongoing rural-urban drift; humanitarian assistance in Baidoa, including that from UNHCR, is drawing additional populations into urban areas where they anticipate better access to resources and support. Some of these populations that cannot travel to urban centres due to ongoing violence, insecurity, and the lack of viable transportation options, walk hundreds of kilometres to remote locations of possible assistance while coping with lack of food and water, loss of life, and the unpredictable conditions in the IDP camps, they reach. This runs counter to the second pillar of the Theory of Change in the Focus Area Strategic Plan for Climate Action 2024-2030, which states that 'Forcibly displaced, stateless and their hosts have increased access to services that promote the rights-based, sustainable use of natural resources and a clean and healthy environment'.
72. **The implication of such access limitation is profound in Southern Somalia. Displaced communities, households and individuals who migrate to urban areas in pursuit of assistance frequently find themselves in precarious living conditions, lacking adequate shelter, sanitation, and access to basic services in a situation of increasing resource scarcity.** The IDP settlement camps, while providing temporary refuge, often become breeding grounds for further humanitarian crises, including heightened risks of disease, malnutrition, and social unrest including protection issues, such as GBV, and other crimes that may rather exacerbate the camp population's vulnerabilities.<sup>77</sup> The challenges of urbanization further complicate the situation, as already strained host communities may also struggle to become IDP communities as influxes of new residents increase, leading to unmanageable tensions and conflicts over limited resources. The strategic dilemma faced in Baidoa mirrors

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Abdimalik Ali Warsame, et al (2023). Towards sustainable environment in Somalia: The role of conflicts, urbanization, and globalization on environmental degradation and emissions, *Journal of Cleaner Production*, Volume 406, 2023, 136856, ISSN 0959-6526, <https://doi.org/10.1016/j.jclepro.2023.136856>

<sup>76</sup> This has been ongoing over the evaluation period. See, for example "Increasing pressure on overstretched IDP settlements as 37,596 individuals arrive in Mogadishu, Baidoa and Xudu Protection and Return Monitoring Flash Alert # 1, 27 January 2022".

<sup>77</sup> UNHCR Annual Reports (2022, 2023).

UNHCR Participatory assessments (2022, 2023).

ReliefWeb. (2023, September 26). Children die of diarrhoea and other diseases in Mogadishu IDP camps. ReliefWeb. <https://reliefweb.int/report/somalia/children-die-diarrhoea-and-other-diseases-mogadishu-idp-camps>.

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that of Kismayo, another city grappling with similar dynamics. In both contexts, UNHCR must navigate the balance between fostering horizontal partnerships that involve local stakeholders and focusing interventions specifically on the population's needs. This decision-making process presents a critical challenge, as choosing one approach over the other can lead to significant implications for the effectiveness and sustainability of the assistance provided.

73. As mentioned above, the transfer of this knowledge to international staff is not structured, highly constrained as it is by the workload and rotations of personnel (the two-year limit for most international staff creates an obstacle and disincentive for meaningful context sensemaking).<sup>78</sup> This is compounded by settlements that the UN has forbidden itself from accessing. In Dollow, for example, UNHCR staff and partners gave the example of Luuq, a hard-to-reach area, recently allocated a focal point under the ABC approach. It is hard to reach due to the UN policy, which is guided by the Somalia Government's decision to legally prohibit any access negotiations with non-state actors.

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<sup>78</sup> See staffing analysis in fit-for-purpose section for more details.

## EQ2. Fit-for-Purpose

UNHCR's staffing strategy in Somalia has partially adapted to evolving needs by prioritising efficiency gains through increased nationalisation and a 26% reduction in international staff. While this shift reduced costs and strengthened local capacity, it also resulted in the loss of expertise in protection, solutions and operational management. Targeted recruitment in disaster management, security and education aimed to align staffing levels with operational priorities. However, medium-term human resource planning - essential to support UNHCR's increasing focus on inclusion, national systems and livelihoods - was constrained by limited resources, recruitment challenges and the difficulty of defining a human resource plan in a volatile operational environment. High vacancy rates (39.8% in 2024), heavy workloads, and frequent staff rotations further weakened operational capacity and hampered the organization's ability to implement its evolving strategy and achieve its intended results.

UNHCR's field presence at sub- and field office level reflects visions expressed in the operational strategy in Somalia. This has helped maintain strong government relationships (at FGS and FMS levels), and UNHCR's tri-cluster role, both of which are recognized as advanced compared to other agencies (apart from WFP). However, UNHCR's presence on the ground has been costly. Its budget structure shows a persistently high percentage of available funds (OL) allocated to STAFF and Administrative Budget and Obligation Document (ABOD), to the detriment of available funds for operations costs (OPS).<sup>79</sup> This ratio of STAFF/ ABOD to OPS is higher than the standards defined by UNHCR (30% / 70%). The structure of available funds (OL) by pillar also reveals a certain imbalance in the allocation of funds between the refugee programme and the IDP programme, where the greatest needs are in fact concentrated. While UNHCR's policy on internal displacement emphasizes its responsibility to support UNCTs, coordinate clusters, build alliances and act as a provider of last resort, it also outlines an operational role in critical protection areas - including community engagement, legal and policy frameworks, documentation, shelter, secure land tenure, livelihoods, peaceful coexistence and conflict resolution - for which limited resources have been allocated.<sup>80</sup>

Between 2021 and 2024, UNHCR struggled to diversify its donor base and continued to rely heavily on four donors, who provided 95% of funding. US funding alone accounted for 73% of this total. Despite increased outreach efforts in 2024, funding from private and multilateral sources remained limited. UNHCR's moderate participation in joint programmes and limited visibility in pooled funding mechanisms, such as the UN Multi-Partner Trust Fund, further constrained its adaptability. Positive examples included collaboration with the AfDB but broader partnerships for resilience and climate (an emerging priority for the operation) were still nascent at the time of this evaluation.

Finally, although UNHCR devotes significant efforts to monitoring and reporting on results in Somalia, this does not provide systematic and consistent information on expected

<sup>79</sup> ABOD refers to the Administrative Budget and Obligation Document, which covers administrative costs, staff (including Temporal Appointments) salaries, and daily subsistence allowances (DSA). STAFF refers to UNHCR personnel, both regular and temporary, who are part of the organization's structure. OPS refers to the Operations budget, which is allocated per operation for partner and direct implementation of activities, covering goods and services provided to forcibly displaced people.

<sup>80</sup> See Policy on UNHCR's engagement in situations of internal displacement, chapter 6.2. Delivering a protection and solutions response. See also UNHCR Institutional Plan on Solutions to Internal Displacement, chapter Revised programmatic approaches towards IDP solutions ("Under the new approach UNHCR country operations, including those involved in IDP response, now develop three to five-year multiyear strategies encompassing the full spectrum of the organization's operational engagement, including humanitarian response, advocacy and capacity development, inclusion and transition toward solutions.").

changes and achievements. Furthermore, there is no data or justification for prioritising outputs at the OL level based on resource estimation at the OP level (what criteria and reasons explain and document the “transition” from OP to OL). This is particularly relevant to the OPS (OL) budget line. There is also no information on changes and adjustments to programming made during the year due to fluctuations in available funds (OL). Additionally, the OL budget for the STAFF and ABOD budget lines is apportioned equally between all outputs, which dilutes the analysis of UNHCR's 'prioritisation'. These shortcomings limit the analysis of the coherence between strategy, priorities and available resources.

## A FIT-FOR-PURPOSE WORKFORCE

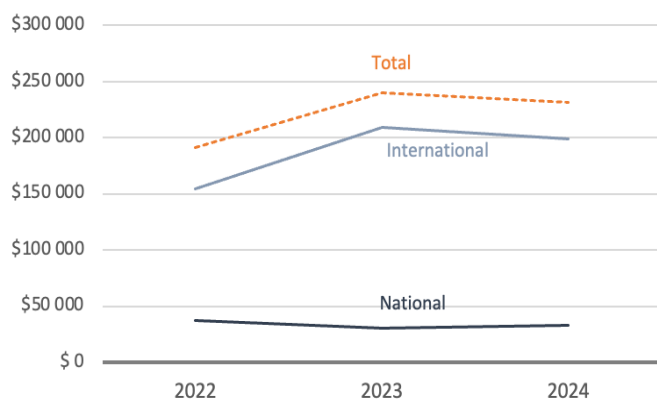
74. **UNHCR's human resources strategy has progressively adapted to the changing needs and strategic developments of the organisation to ensure that the workforce is generally aligned with the expected results in Somalia.** In an environment characterized by growing humanitarian needs and budget constraints, UNHCR has chosen a versatile approach where teams often take on multiple roles, combining cluster coordination (CCCM, Protection, etc.) with programmatic activities. This flexibility has maximized operational efficiency but also led to heavier workloads for staff, especially in complex contexts such as Kismayo or Mogadishu. In these locations, reorganization, such as the removal of P4-level positions, have, at times, created further pressures.
75. To address the challenge of multiple roles for one position, UNHCR has invested in the development of internal capacities by implementing targeted training programmes to develop specific skills. UNHCR also strived to align positions and employee profiles with strategic priorities, notably through integrated initiatives such as the Midnimo and Luglow settlement projects, which combine protection, durable solutions, and livelihood support.
76. **Between 2022 and 2024, UNHCR adopted a strategy of deploying national Somali staff, prioritizing their recruitment (+23%) and reducing international staff (–26%), which in 2024 represented 26% of the total workforce, even though international staff should play a crucial role in key areas such as international protection, solutions, and operational management.** The data available for the evaluation is consistent with the results of the 2024 Staffing Review, which reported a ratio of 71.2% national and 27.7% international staff. The ‘nationalisation’ of staff took place in an operation where 23.4% of staff have worked 10 years or more with UNHCR.<sup>81</sup> While the nationalisation process stabilised positions with extensive local experience and knowledge, it also contributed to consolidating a vision of continuity in UNHCR's strategy and programmes.<sup>82</sup>
77. The distribution of positions among national staff shows a high concentration in administration and finance (34.9%), as well as in operational activities (33.3%). With the available data, it should be noted that the international staff average cost increased by 29% between 2022 and 2024, while the average cost of national staff decreased by 11% over the same period (see figure 8 below). The evaluation was unable to cross-check these figures with the other available data, particularly since the evolution of positions (a reduction in higher-level grades for international staff and an increase in grades for national staff) appears to suggest the opposite trend.

<sup>81</sup> UNHCR: Strategic Workforce and Structural Planning Section. Briefing Note on Somalia - May 2024.

<sup>82</sup> See below for the reference to the resistance to change identified by the evaluation.



**FIGURE 8: EVOLUTION OF AVERAGE COST OF INTERNATIONAL AND NATIONAL STAFF (2022-2024)**



Source: UNHCR: UNHCR: Compass data OP OL 2022-2024 - Workforce data 2022-2024

**78. The reduction of international expertise has posed challenges in critical areas such as protection and solutions.** The increasing reliance on national staff has concentrated roles in administration, finance, and operational activities, enabling cost reductions but at the expense of maintaining a workforce delivering technical and strategic outcomes. Between 2022 and 2024, UNHCR reduced international positions in the P3 (-25%) and P4 (-53%) grades, which significantly affected the functional units of protection and solutions (-10% between 2022 and 2024) where international positions were concentrated.

79. This reduction of international staff was concentrated in sub offices (-65%) and field offices (-80%), as well as, to a lesser extent, the Field Units (-18%). In contrast, the Country Office saw a 136% increase in international staff. Despite financial constraints, UNHCR expanded its workforce to address emerging needs, for example in disaster management, security, and biometric registration. These targeted hiring practices combined with programmatic activities provided displaced populations with access to local systems and have enhanced operational efficiency in specific contexts, such as data management for the registration of populations in settlements.<sup>83</sup> Nevertheless, gaps in human resource planning, alongside planning uncertainties and resource limitations continue to hinder a fully fit-for-purpose workforce. UNHCR respondents themselves recognise that the most significant gaps relate to the promotion of self-reliance, and climate related programming.

**80. There is also a clear difficulty in overcoming the knowledge management gaps generated by the frequency of rotations of international staff (18 months to a maximum of 24 months), compounded by the difficulty of access to remote areas.**<sup>84</sup> Each deployment to the sub-offices and field offices is made heavier by the need to have escorts as stipulated in UNDSS requirements. In addition, 39.8% of planned positions remained vacant in 2024, representing a challenge for longer-term resource planning and deployment. Frequent rotations of international staff and high vacancy rates have significantly weakened institutional memory and continuity in operations. Limited onboarding processes and the absence of robust knowledge management systems exacerbated these challenges, leading to gaps in strategic focus and learning.<sup>85</sup>

<sup>83</sup> UNHCR Annual Reports (2022, 2023); UNHCR Participatory assessments (2022, 2023).

<sup>84</sup> Field work and interviews with UNHCR staff.

<sup>85</sup> High staff turnover and delays in filling vacant positions resulted in operational constraints, including reduced implementation capacity and challenges in the swift handover process between outgoing and incoming employees. The absence of someone to transfer knowledge to resulted in a gap in knowledge transfer, and consequently a loss of organisational and individual learning. These issues are frequently referenced in UNHCR's annual reports, Risk registers, and have been repeatedly noted by staff in sub-offices and country office.

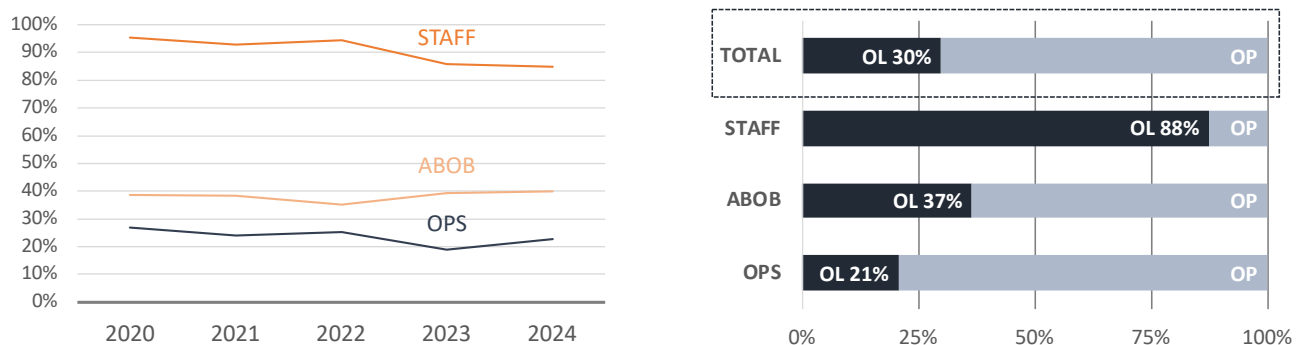
**81. Organizational adaptability in Somalia was met by staff resistance to change and a strategic vision diluted in planning that covers a wide range of outputs and outcomes.**

While UNHCR implemented several management reforms, it also generated a complex strategic plan that is not truly understood or implemented by field personnel (national and international).<sup>86</sup> The MYSP document, for example, running at nearly 100 pages, contains a total of 66 output statements, identified without broader staff consultations and without a line of sight between vision (outcome and impact statements) and inputs, UNHCR and implementing partner activities and outputs. In practice, implementation of the MYSP has revolved around activities, which are interpreted by senior personnel as a residual presence of past activities built into the MYSP. In interviews, UNHCR personnel recognise that the impact areas themselves are overlapping, which touches on how to categorise outcomes in COMPASS all of which affected staff engagement and ownership of UNHCR planning.

**82. UNHCR's ability to adapt its staffing strategy has been constrained by the high cost of staffing in relation to programme size and budget.**

Between 2020 and 2024, the available funds (OL) for the STAFF line covered 88% of the needs-based budget (OP) for staff. In contrast, the OL for the OPS line covered only 21% of the OP, reflecting a strong discrepancy in the allocation of the OL and limitations in UNHCR's operational capacity (see figure 9 below). This questions consistency between human resources planning based on, respectively, needs (OP) and available funds (OL) to implement prioritised operation interventions.<sup>87</sup> In addition, the homogeneous apportioning of the STAFF<sup>88</sup> budget line (both at OP and OL) by outputs prevents the analysis of the consistency of STAFF allocation in relation to outcomes, impact areas and, more generally, UNHCR's multi-annual strategy.<sup>89</sup> Furthermore, in 2024, the entire OL STAFF budget was allocated to the Protection impact area for no apparent reason, leading to confusion in the analysis of STAFF budget.<sup>90</sup>

**FIGURE 9: AVAILABLE FUNDS RATE (OL/OP) PER BUDGETARY CATEGORY AND YEAR (2020-2024) AND AVERAGES RATES OF AVAILABLE FUNDS (OL) PER CATEGORY OVER THE PERIOD 2020-2024**



Source: UNHCR: Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO) & Somalia financial data\_2020-2023\_V2

**83. The analysis of the allocation of available funds (OL) between 2020 and 2024 reveals a stable distribution between the resources allocated to the STAFF / ABOD lines and**

<sup>86</sup> KII with UNHCR staff.

<sup>87</sup> See UNHCR HANDBOOK FOR WORKFORCE PLANNING Delivering through our People (2023); Section COMPASS entries and apportioning.

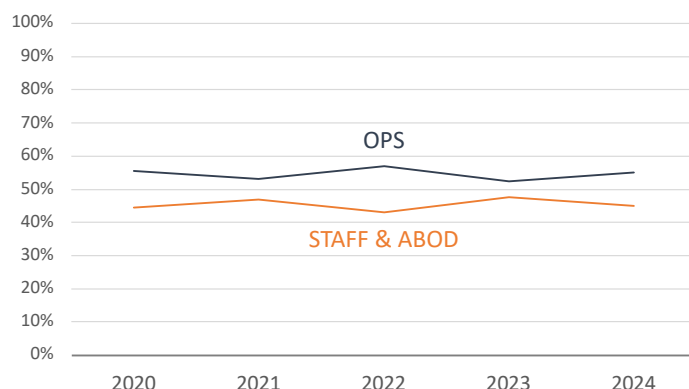
<sup>88</sup> Ibidem.

<sup>89</sup> In 2023, the STAFF budget line (OL) was evenly apportioned (1% each) across 28 outputs, representing 58% of all outputs.

<sup>90</sup> At the time of writing, EvO has informed the evaluation team that these staff figures reflect a system error which has since been corrected. The evaluation team was unable to triangulate the information provided by EvO.

**those dedicated to OPS.** The funds available for STAFF have remained on average around US\$15 million, while those dedicated to operations have been around US\$30 million. It should be noted that the OPS budget includes the cost of affiliated workforce (AWF) <sup>91</sup> posts, which increases the share of personnel costs, even if these appear diluted in the OPS line. During this period, the proportion of the budget lines relating to available funds (OL) remained relatively stable, with an average of 45% allocated to STAFF and ABOD, compared with 55% for OPS. This ratio of STAFF/ABOD to OPS is significantly higher than the standards defined by UNHCR (30%/70%) (see figure 10 below).

**FIGURE 10: STAFF/ABOD AND OPS BUDGET LINES (OL) 2020-2024**



Source: UNHCR: Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO) & Somalia financial data\_2020-2023\_V2

**84. In part, the high weight of the STAFF budget line is driven by the difficulties of operating in Somalia requiring considerable oversight, field presence, and security measures.** However, these factors alone do not explain the discrepancy between the funds allocation (OL) for STAFF/ABOD and for OPS. Operational and funding constraints have tended to dominate the decisions, which have been considerable and are necessary to acknowledge.

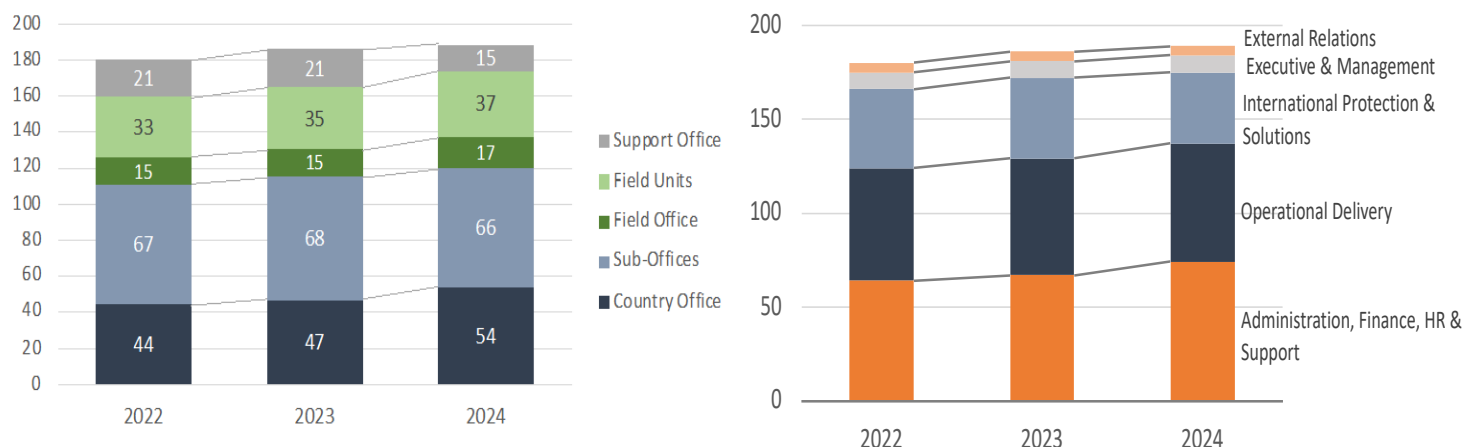
**85.** By virtue of its protection mandate covering all forcibly displaced populations, UNHCR is bound to maintain technical relationships with the government at federal, state and local levels. The lack of internal coherence, and often outright competition, between different parts of Government, dictates multiple points of engagement and constant capacity strengthening of rotating government focal points. Given that UNHCR supports the IASC, it is committed to engage in the cluster system, leading or co-leading three clusters (a role which is also the basis of engagement with federal, state and local level government), as well as engaging in the HNRP and UNSDCF processes as a member of the UNCT. In addition, the difficulties of operating in Somalia require considerable oversight, field presence and logistics. This has required the establishment of a stable structure in terms of field presences and administrative personnel, and in some cases given staff and budgetary reductions, limited sector technical and protection and solutions expertise. Going forward this requires a dedicated consideration for delivery of sustainable responses in a context where emergency responses are reoccurring.

**86. UNHCR's workforce growth was concentrated in the country office in Mogadishu and in the administration and finance department, despite the OPS budget line having had low budget allocations for the past four years.** The country office in Mogadishu increased from 44 to 54 professionals (+23%) between 2022 and 2024, while the field offices and units

<sup>91</sup> Between 2022 and 2024, an average of \$1,250,000 per year has been allocated to AWF staff through the OPS budget line.

increased their staff by 13% and 12%, respectively. The support office has experienced the largest reduction in workforce. (-29%). In terms of functional units, over the period 2022 to 2024, administration, finance, HR and support had the largest increase (+16%) in the workforce, while international protection and solutions had the largest decrease (-10%) (see figure 11 below).

**FIGURE 11: WORKFORCE PER OFFICE AND BY FUNCTIONAL UNITS – 2022 -2024**



Source UNHCR: Workforce data 2022-2024

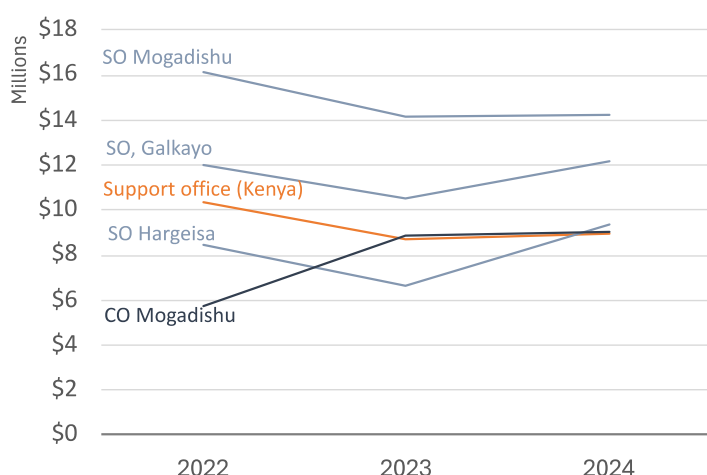
## ALIGNMENT OF FIELD PRESENCE WITH STRATEGY

87. **Other than WFP, UNHCR's field presence is relatively high compared to other UN operational agencies. Despite the high cost of maintaining its field presence, this has been central to establishing a positive relationships with the government institutions (federal, state and local levels) and the 'tri-cluster' lead role.** UNHCR has deployed a decentralized organization to address the challenges posed by the extreme climate events and protracted conflicts in Somalia (see figure 12 below). With a main office in Mogadishu, three sub-offices (Mogadishu, Galkayo, Hargeisa), and several field units (1 field office and 8 field units);<sup>92</sup> this configuration allows for wide coverage of areas affected by displacement.

88. However, it has been difficult for the organisation to use and maximise its field presence during a time of budget cuts and in a context with significant challenges, for example political complexity, internal conflict, climate change and recurrent emergencies, insecurity and the inaccessibility of certain regions. Furthermore, the lack of on-site supervision has led to gaps in programme management and implementation, particularly in rural areas where insecurity makes it more difficult to reach displaced populations.

<sup>92</sup> UNHCR: Workforce data 2022-2023.

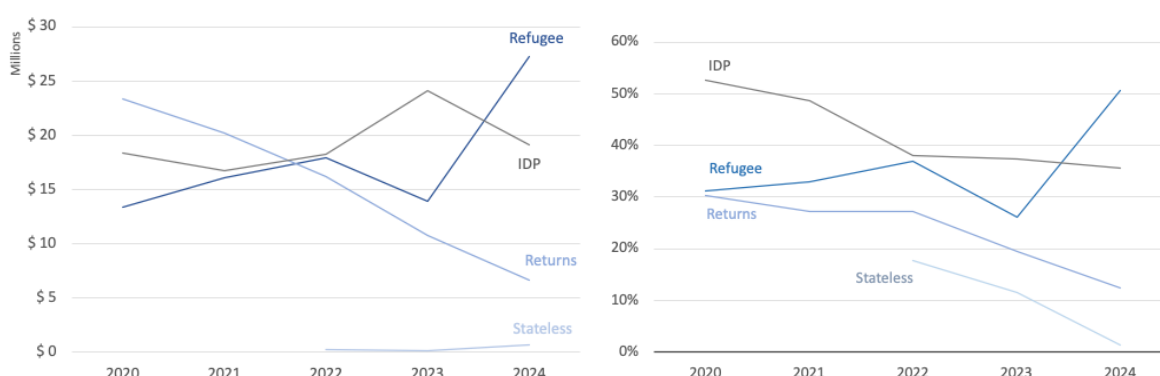
**FIGURE 12: AVAILABLE FUNDS (OL) BY FIELD PRESENCES - 2022-2024**



Source: UNHCR: Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO)

**89. In 2024, UNHCR's budget distribution remains highly concentrated: more than half (51 %) of the available funds (OL) go to the Refugees programme—an allocation that does not mirror the varied humanitarian needs of refugees and internally displaced persons (see Figure 13 below).** From 2020 to 2024, available funds for the Refugees programme more than doubled (+103 %), whereas funding for internally displaced persons (IDPs) programme rose by just 4 %. The share of available funds (OL/OP) allocated to the IDP programme continues to decline, partly because UNHCR has shifted from a primarily operational role to a more 'catalytic' role.<sup>93</sup> During the same period, available funds to the Returns programme dropped by 71 %, likely reflecting fewer repatriations, while the Statelessness programme has always had a very low level of available funding due to the small caseload.

**FIGURE 13: AVAILABLE FUNDS (OL) AND OL/OP RATIO PER PILLAR– 2020-2024**



Source: UNHCR Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO) & Somalia financial data\_2020-2023\_V2

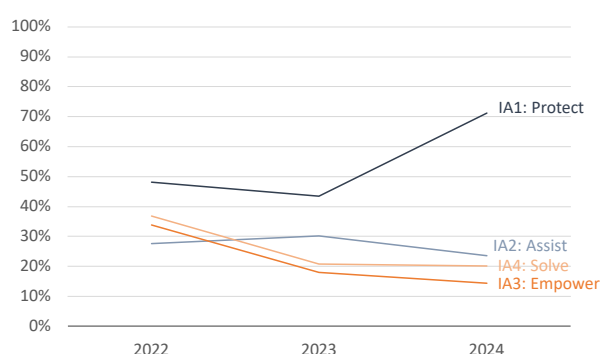
**90. UNHCR budget structure by pillar and impact area (OL) shows a higher availability of funds (OL/OP ratio) in the protect and assist impact areas of the two main programmes**

<sup>93</sup> UNHCR Somalia Multi-year strategy 2023-2025. Internal document for country operations; word file available in UNHCR e-library.

(refugees, IDPs) as well as in the returns programme (see figure 14 below). The availability of funds for the impact areas of empower and solve is low and shows a decreasing trend over the period in all four pillars, reflecting the difficulty of aligning budgetary efforts with UNHCR's priorities in the MYSP, which states that: "To achieve the expected impact, in the planning period, the operation is undertaking a substantial shift by increasing the requirement under the "solve" impact area while the budget under the "assist" impact area is reduced compared to 2022 planned resources."<sup>94</sup>

91. **The funding gap between planned and available resources (OL/OP) is very high in all four programmes during the period 2022-24 except for the 2024 Protection programme that was prioritized, and in relation to which there was only a gap of 70% between OP and OL..** Furthermore, the funding gap increases over the period in all cases indicating low capacity to fund UNHCR's durable solutions interventions. A disaggregated analysis of UNHCR's budget structure by outcome shows that available funds (OL) were mainly concentrated in the programmes of well-being, shelter and GBV, and to a lesser extent in health and education programmes. Despite budgetary efforts, the OIOS report<sup>95</sup> found significant performance concerns in these programmes.<sup>96</sup>

**FIGURE 14: OL/OP RATIO PER IMPACT AREA– 2022-2024**



Source: UNHCR Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO)

## ADAPTATION TO THE FUNDING ENVIRONMENT

92. **The persistence of critical humanitarian needs in Somalia has made it difficult for UNHCR to adapt its needs-based budget planning (OP) to an international and national context of increasing humanitarian funding challenges.**<sup>97</sup> Between 2020 and 2023, UNHCR's needs-based budget planning (OP) mirrors trends in HNRP budget planning between 2020 and 2023, i.e., a steady annual increase pointing to rising humanitarian needs. Although the humanitarian needs estimated by the HNRP in 2024 remained above the average of recent years, and the national situation remained critical with, e.g risk of famine, there was a change in this trend. Through a process of strict prioritisation and reflecting the end of the drought, the HNRP reduced its 'ask' by 38%. Meanwhile, UNHCR planned a slight increase of

<sup>94</sup> Section 4.1 Operational Management, Resources and Capacity.

<sup>95</sup> OIOS internal audit division, Report 2024/01902. Audit of the operations in Somalia for the UNHCR.

<sup>96</sup> See section Contributions to Envisioned Results for more details.

<sup>97</sup> The MYSP, by contrast, optimistically stated: "To operationalize the strategy over the next three years, there is a substantial financial requirement of close to US\$500 million. In this regard, a robust resource mobilization drive is needed given the high capital investment required to achieve durable solutions, for example in infrastructure and construction of permanent housing solutions for displaced populations. In addition, the operation will ensure that there is adequate capacity to deliver on outcomes by investing in the required human capital as well as the appropriate office structure, through identification of key profiles strategic location." (Executive Summary).



2% (OP), in a context of progressively reduced humanitarian funding to Somalia<sup>98</sup> and with corporate budgetary restrictions.

93. The trend of reduced humanitarian funding for Somalia, (i.e. from 91% of funding received for the HNRP in 2022 to 42% of funding received in 2023), forced the HCT to strongly prioritise the most vulnerable displaced populations and focus on life-saving interventions, primarily in ten priority districts. Through a process of multi-sectoral prioritisation, the HNRP 2024 estimated a 24% reduction in the number of people in need of protection and a 22% reduction in the number of refugees, compared to 2023.<sup>99</sup>
94. The drive to rationalise the budget for the humanitarian response continues into 2025 with the Joint and Intersectoral Analysis Framework<sup>100</sup> 2.0 (JIAF). As above, UNHCR continues to play a key role in the development and use of the JIAF, and it abides by the geographical prioritisation that the JIAF produces. At UNHCR level, population planning figures for 2023 - 2025<sup>101</sup> foresaw a steady annual growth of people assisted, in particular, returned IDPs, even though the context analysis and risks identified by the organisation detected increasing funding difficulties, including the emergence of other global crises, which have captured the attention of donors. In the case of refugee returnees, the 2024 OIOS audit report highlighted that UNHCR did not reduce its activities nor budgets in proportion to the decrease in the number of refugee returnees from Kenya to South Central and Southwest Somalia.<sup>102</sup>
95. **UNHCR has struggled to adapt its funding model (donor portfolio) to the evolving vision and strategic priorities of the operation (especially the focus on durable solutions, collaboration with development actors, the private sector and climate change)<sup>103</sup>, and has redoubled efforts to do so in 2024 and into 2025.** Despite UNHCR's efforts to diversify its funding model, the organisation has remained heavily dependent on a single donor (US bilateral funding), has fundraised less than other agencies,<sup>104</sup> has been a moderate recipient of funds through the UN Multi-Partner Trust Fund,<sup>105</sup> has been slow in approaching international financial institutions.<sup>106</sup> As mentioned, UNHCR Somalia's funding model has been heavily dependent on public sector funding, primarily US bilateral funding, which accounted for 73% of total funding for the period under review (see figure 15 below). Between 2021 and 2024, 95% of UNHCR Somalia's funding relied on just four donors (Japan, Germany, CERF and US bilateral funding).

<sup>98</sup> Humanitarian Needs and Response Plan Somalia 2024, key planning figures, trends 2019 - 2024. See also OCHA financial tracking service for Somalia, as well as the UN Country based Pooled Funds DATA HUB (<https://cbpf.data.unocha.org/index.html>). The Official Development Assistance flows also show a decreasing trend, although with less intensity than humanitarian aid funds (OECD Data explorer, Official flows by country and region; <https://data-explorer.oecd.org>).

<sup>99</sup> The 2025 discussions at ICCG level and HOHA shows that Somalia can only rely on US\$350.000.000 (25%) out of the total of 1,4 bill requested under the HNRP.

<sup>100</sup> The Joint and Intersectoral Analysis Framework (JIAF) version 2.0 is a multi-agency tool (UN and partners) that 'sets global standards for the estimation and analysis of humanitarian needs and protection risks. The JIAF's primary objective is to inform strategic decision-making, response analysis, and response planning through a rigorous, evidence based, and comprehensive joint and intersectoral analysis framework.'; Technical Manual; Joint and Intersectoral Analysis Framework - Humanitarian Programme Cycle Steering Group July 2023.

<sup>101</sup> Somalia Multi-year planning 2023-2025, Internal Document for Country/MCO Operations.

<sup>102</sup> OIOS internal audit division, Report 2024-01902. Audit of the operations in Somalia for the UNHCR.

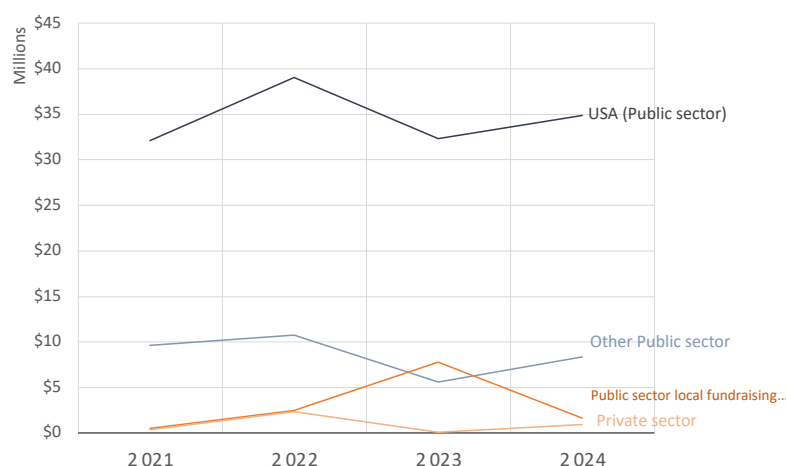
<sup>103</sup> UNHCR Somalia Operations Plans and Somalia Multi-year planning 2023-2025, Internal Document for Country/MCO Operations.

<sup>104</sup> OCHA financial tracking service for Somalia.

<sup>105</sup> United Nations Somalia Joint Fund annual reports.

<sup>106</sup> Access to funding from international financial institutions, which the evaluation was able to document, occurred in 2023 through a proposal approved by the AfDB under the Prevention Envelope of the Transition Support Facility (in partnership with UN Habitat, FAO, UN Women and IOM). UNHCR's resource mobilisation strategy envisaged diversifying funding and reaching out to new donors from 2020, and accessing opportunities through the IMF, World Bank and AfDB from 2021. Several interviewees acknowledged UNHCR's difficulties in diversifying partnerships, establishing agreements with non-traditional donors and accessing development funds.

**FIGURE 15: EVOLUTION OF UNHCR SOMALIA FUNDING 2021 - 2024**



Source: UNHCR Funding update 2021-2024

96. Available data indicate<sup>107</sup> that UNHCR does not appear as a partner in the United Nations Organisation in Somalia Joint Fund reports. UNHCR staff were consistently of the opinion that competition for funding had been intense throughout the evaluation period, and that UNHCR worked to define and 'sell' its added value in both the IDP emergency response and the development sphere for refugees. The Government of Somalia, through direct budget support from the World Bank, has become the second largest funder of humanitarian organisations,<sup>108</sup> however, the evaluation did not identify this as a source of local funding for UNHCR. The operation has benefited from the regional agreement between UNHCR and the AfDB under the Transition Support Facility in the framework of the regional programme on enhancing the investment climate for the economic empowerment of refugee, returnee and host/return community women in the East and Horn of Africa and Great Lakes region.<sup>109</sup> The AfDB is to be the funder of the IDP settlement project in Dollow, with UNHCR as the lead of the consortium. In contrast, UNHCR has not benefited from emerging funding opportunities,<sup>110, 111</sup> despite it having been one of the recurrent intentions of the resource mobilisation strategy.<sup>112</sup> Although UNHCR's funding through the private sector increased significantly in relative terms between 2021 and 2024 (157%), it represents a low volume of the operation's funding model in absolute terms (around US\$900,000 in 2024).<sup>113</sup>

97. **The implementation of global agreements between UNHCR and other agencies in Somalia appears to have been limited although UNHCR has redoubled efforts to do so in 2024 and 2025 and partners acknowledge the recent intent to forge stronger partnerships.** For example, in an operation characterised by internal displacement, emerging mixed movements and increasing climate change-related displacement, there is regular and relevant communication and cooperation with IOM<sup>114</sup> (for example assisted spontaneous

<sup>107</sup> See , for example United Nations Somalia Joint Fund reports.

<sup>108</sup> United Nations Somalia Annual Report 2023.

<sup>109</sup> AfDB, Transition Support Facility (TSF, Pillar III).

<sup>110</sup> Private Philanthropy for Development funding (constant prices) to Somalia doubled between 2020 and 2022, although in absolute terms it still represents a modest amount of total official development aid funding (OECD Data explorer, Private Philanthropy for Development; <https://data-explorer.oecd.org>).

<sup>111</sup> Green Climate Fund GCF; Green Climate Fund and Somalia: Accelerated US\$100 million investment partnership (<https://www.greenclimate.fund/news/green-climate-fund-and-somalia-accelerated-usd-100-million-investment-partnership>).

<sup>112</sup> UNHCR Somalia Operations Plans and Somalia Multi-year planning 2023-2025, Internal Document for Country/MCO Operations.

<sup>113</sup> UNHCR Funding updates 2021 - 2024 Internal version (xls file available in UNHCR e-library).

<sup>114</sup> IOM/UNHCR Framework of Engagement 2022 and related documents.

returns, internal displacement data, etc.) and UNDP<sup>115</sup> (for example joint rule of law programme in Somaliland<sup>116</sup>), but joint programmes identified through the UN Multi Partner Trust Fund Office<sup>117</sup> appear limited in scope and funding.<sup>118</sup> In the case of UNDP, a joint planning process has been initiated in 2024 to identify joint partnerships for durable solutions for forcibly displaced persons,<sup>119</sup> which is one of the most relevant inter-agency initiatives identified during the evaluation. Synergies with UN Environment or the Green Climate Fund to leverage climate financing and ensure that resilience and adaptation investments reach communities hosting forcibly displaced persons are still at an early stage due to the fact that no agreements have been signed by the CO at the time of writing.

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<sup>115</sup> UNHCR-UNDP Partnership on Forced Displacement 2021.

<sup>116</sup> UNHCR is listed as a partner (not a participating agency) in the current phase of the 2024-2026 programme ([https://mptf.undp.org/sites/default/files/documents/2024-02/annex\\_i\\_prodoc\\_un\\_jr](https://mptf.undp.org/sites/default/files/documents/2024-02/annex_i_prodoc_un_jr)).

<sup>117</sup> <https://mptf.undp.org/country/somalia>.

<sup>118</sup> Leaving No One Behind - The Internal Displacement Solutions Fund. Asaaska Fikir Programme 2024 - 2026: UNHCR receives 10% of the approved budget(<https://mptf.undp.org/project/00140621>).

<sup>119</sup> UNHCR and UNDP workshop in Mogadishu, December 2024, as part of the UNDP-UNHCR Global Collaboration Framework for inclusion and solutions 2023 - 2025.

## EQ3. Synergies and Partnerships

UNHCR has consistently invested in synergies with partners on which it depends for multiple aspects of implementation. The effort to reduce the number of NGO partners from 17 to 6 has been a necessary solution to overcome fragmentation of activities and reporting. It has, however, come at the price of a reduced interface with smaller local organizations.

Its focus on tri-cluster support for IDPs, despite their vast needs, reflects a limited financial commitment. Funding allocations are distributed across the range of outcome areas, which means a disproportionate amount for a small percentage of the forcibly displaced populations, i.e., refugees and asylum seekers.<sup>120</sup> This places UNHCR in a lateral position in the country coordination, which itself remains relatively unclear.

Implementing partners some of which work with multiple funding sources and accumulate local relations and knowledge, tend to see UNHCR as a donor due to its rigid funding measures and limited strategic engagement.

Internally, UNHCR integrates emergency preparedness into programming, but it faces resource constraints, operate with inflexible targets and limited contingency planning.

Cross-border coordination with UNHCR Kenya, Ethiopia, and Djibouti aids protection and data sharing, but is not building up to a more structured refugee-oriented response as envisaged in a Route-Based Approach. This comprehensive, targeted and coordinated approach involves States, UNHCR, IOM, other UN agencies in ensuring safer and more dignified movement across multiple states and hazards and would be relevant for a country of departure.

### SYNERGIES WITH PARTNERS

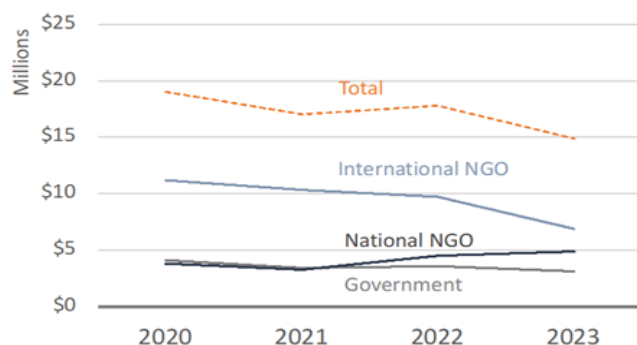
98. **The streamlining of implementing partnerships in 2024 has enhanced UNHCR's ability to engage at the local level due to greater clarity of tasks. However, partnerships with local actors to localise responses and build sustainable local capacity require attention as fewer and larger partners provide accountability but pose a risk to a truly local agenda.** There has been a gradual reduction in implementing partnership agreements with NGOs between 2022 and 2024, accentuated with sub-national shifts. This reduction was driven by the overall reduction in funding and the resulting anticipated budget, as well as operational decisions made at national and sub-national levels. By implementing partnership reductions, UNHCR intended to consolidate the focus on Sustainable Response, minimise risks associated with these partnerships, and the time required for the management of the contracts. Over the evaluation period Implementing Partnership Management Committee (IPMC) meeting minutes and interviews contained multiple references to this intent to reduce the number of partnerships.
99. **UNHCR's partnership structure in Somalia reflects a significant localisation effort in a context of declining overall funding, although the 2024 OIOS<sup>121</sup> audits repeatedly questioned the rigour of the partner selection process and the delivery of some of the national partners.** UNHCR has managed to slightly increase the funding available to national implementing partner NGOs, while the total funding available to these partners decreased from around US\$20 million to US\$15 million over the period 2020 – 2023 (see figure 16 below).

<sup>120</sup> As stated by a UNHCR staff member "40.000 asylum-seekers and IDPs and 3,5 million IDPs. There is a disconnect."

<sup>121</sup> OIOS internal audit division, Report 2024-01902. Audit of the operations in Somalia for the UNHCR.

The reduction in funding available to partners has particularly affected international NGOs and, to a lesser extent, national institutions. This drop in funding affected primarily the top five partners, which are the Norwegian Refugee Council, Danish Refugee Council, Mercy Corps, the National Commission for Refugees (a Somali public body) and Alight (a regional partner). Evaluations and interviews point to weaknesses in UNHCR's ability to create strategic, as opposed to transactional partnerships with local organisations.<sup>122</sup> In addition, the OIOS audit findings point to gaps in the functioning of the Representation's IPMC for the selection and retention of partners.

**FIGURE 16: EVOLUTION OF UNHCR FUNDING TO PARTNERS (2020 -2023)**



Source: UNHCR Partnership financial per year.xlsx (2020 – 2024)

100. The review of UNHCR's partnership structure culminated in decisive action in late 2024, when senior management started a significant 'right-sizing' of partnerships with NGOs for project implementation. UNHCR launched a new call for proposals in 2024, with the aim of rationalizing the number of partners in 2025. This reduced the number of NGO partners from seventeen to six.<sup>123</sup> These six partners now have a total of nine work plans signed with UNHCR, which reduces the administrative burden significantly for UNHCR. In keeping with internal and international commitments (such as the Grand Bargain), UNHCR has committed to prioritising partnerships with national organizations, including governments, i.e., organisations that possess local knowledge, expertise, and an understanding of the context. However, its success in meeting the above-mentioned commitments has been inconsistent over the evaluation period as illustrated with figure 16 above.

101. As acknowledged in interviews, international non-governmental organisations (INGOs) with the capacity to implement country-wide offer management efficiencies for UNHCR, especially those that are familiar with UNHCR systems and structures and with which it has established a global relationship. This creates a challenging tension between UNHCR's commitment to fostering sustainable, locally-led programming, which often involves working with local partners that require more intensive support, and its continued collaboration with international partners who can offer short-term efficiencies in programme implementation. For

<sup>122</sup> ITAD, "Evaluation of Internally Displaced Persons (IDPs) in Somalia: 2023 Update," United Nations High Commissioner for Refugees (UNHCR), 2023. This evaluation recommends that UNHCR enhance the ways in which it works with local organizations to support the localisation agenda.

<sup>123</sup> UNHCR retained 6 partners in all, including for National NGOs: African Volunteers for Relief & Development (AVORD); Horn of Africa Peace Network (HAPPEN); Kaalo Aid and Development; University of Hargeisa Legal Clinic; International NGOs: NORWEGIAN REFUGEE COUNCIL (NRC); Save the Children International. Ten Government Entities inclusive of line ministries: Galmudug Commission for Refugees and IDPs (GCRI); Hanano Hospital; Hargeisa Group Hospital; Hirshabelle Refugee IDP Agency; Jubaland Commission for Refugees and IDPs; Ministry of Interior, Federal Affairs & Development; Ministry of Planning, Investments and Economic Development; Ministry of Resettlement and Humanitarian Affairs (MoRHA); National Commission for Refugees and IDPs; SW St. Commission. of Refugees & IDPs. The Refugee Led Organisations are still being processed at the time of writing.

this reason, in the 2024 call for implementing partner proposals, preference was given to partners who can implement country-wide, or at least cover UNHCR activities/interventions in multiple sub-offices. This favoured national NGOs capable of competing with INGOs.

102. Preference for country-wide partners, naturally made it difficult for smaller, community-focused organizations to bid, and hence limited locally led programming. The 2024 IAHE evaluation<sup>124</sup> confirms the widespread perception frequently reported in community surveys and heard during the case study visits: “Affected communities generally mistrust the government’s role in humanitarian efforts, preferring international NGOs and UN agencies for their transparency and consistency over most local actors, including local NGOs”. While the Humanitarian, Development and Peace (HDP) nexus framework supports integrated efforts, siloed donor funding and a lack of shared platforms hinder practical implementation, requiring structural adjustments to fully achieve sustainable solutions.
103. The Triple Nexus approach has been undermined by fragmented donor funding streams and siloed implementation. While UNHCR’s efforts fully align with the HDP nexus, operationalization of the framework has been limited by insufficient engagement with development and peacebuilding actors, and by a high degree of earmarked funding that restricts a more cross-cutting perspective. Such limitations in nexus engagements and collaboration have prevented coherent, long-term programming.
104. In addition, UNHCR is perceived by its implementing partners as having a high degree of rigidity around the need to hit targets. UNHCR funding was described as ‘too tightly earmarked’. Partners described examples where new or recent displacement meant that funds ought to be reallocated/re-assigned, geographically or thematically. From UNHCR’s perspective, they can only be as flexible as donor regulations allow, i.e., when necessary (or when requested), they would ask for funding to be re-allocated – but could not sign off on re-allocation without donor permission. Partners also raised the concern that UNHCR, in calls for proposals, or year on year as programme implementation continues, had higher expectations of what is possible while reducing funding. Partners at Mogadishu level suggested more regular meetings around progress, including the need for refocusing efforts. One said ‘we don’t have the space to discuss learning’ with UNHCR.
105. In a parallel process with Government, UNHCR put in place measures to increase accountability at federal, state, and local levels by streamlining support provided. Government partners, implementing in partnership with UNHCR will also be rationalised from twelve to ten in 2025 (two government entities were discontinued). Furthermore, these partners will each have their own workplan, and these will be guided by an ‘operational compact’,<sup>125</sup> which ties funding to operational outcomes. This process has a dual aim, to reduce the administrative burden on UNHCR, and to improve accountability. Partners confirmed that they worked in conjunction with UNHCR to better coordinate on specific partnerships with government, to reduce duplication, including salary supplements.<sup>126</sup>

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<sup>124</sup> Inter-Agency Humanitarian Evaluation (IAHE), Commissioned by the Inter-Agency Standing Committee, Steets et al, March 2025.

<sup>125</sup> Compact of interventions which guides the priorities and work of all state level IDP and Refugee Commissions and the National Commission for IDP and Refugees.

<sup>126</sup> At the time of writing, UNHCR Evaluation Office has informed the evaluation that the UNHCR salary scale for government partners was reviewed and harmonized across the board. The contribution for higher positions was also reduced due to the funding constraint. This change came into effect on 1st April 2025.



## LINKAGES AND CONVENING POWER

106. **UNHCR's leadership in the protection, CCCM, and shelter clusters underscores its pivotal role in Somalia's humanitarian architecture. Regular risk assessments and joint planning mechanisms have enhanced service delivery.**

107. UNHCR's engagement and role in the UNCT leverages its comparative advantage in protection, particularly through engagement with the authorities, which comes with a strong sub-national government engagement and effective cluster leadership in southern Somalia. Partners and UNHCR staff interviewed in this evaluation consistently testified to this as did available evidence.

108. UNHCR's global evaluation of assistance to IDPs used Somalia as a case study,<sup>127</sup> where it observed that UNHCR was lauded for the quality of its engagement with partners in clusters as well as with relevant government agencies at both the federal and member state level. However, respondents noted that collaboration with development actors could be strengthened and broadened, both through the establishment of stable, structured joint agreements and work plans, and by expanding partnerships with additional organisations.

109. In interviews conducted by the evaluation team, UNHCR was consistently recognized as the UN operational agency most focused on Government engagement and capacity strengthening, especially at sub-national level. Similarly, the UNSDCF<sup>128</sup> evaluation describes how UNHCR secured the enactment of the National Refugee Act, and that persistent legal advocacy by UNHCR led to discussions on the need to move the Kampala Convention<sup>129</sup> into national law to secure the protection of IDPs. Furthermore, in 2024, UNHCR seconded a Senior Regional Protection Officer to the Deputy Special Representative of the Secretary-General with a focus on asylum and solutions in relation to the nine pathways of the Somalia National Solutions Pathways Action Plan.

### *Description of Partner Programming Process*

*Once UNHCR's 'vision' has been created, deliverables need to be articulated by UNHCR's Programme team as outcomes delivered through the Sub-Offices and Field Offices and measured through the organization's Results Based Monitoring system. This requires the Programme Team and Senior Management to make decisions, which reflect the multiple strands of accountability, as well as UNHCR's operational footprint. Ultimately, this requires deliverables to be articulated as funding through partner contracts. The Programme team breaks down the outputs into thematic calls for proposals, which are posted on the UN Partnership Portal. Potential partners apply to UNHCR to implement the programmatic components listed on the Portal. Proposals are reviewed by the multi-function teams in the sub-offices and scored formally, using a standardized rubric, which produces a scoring sheet. At this point, a group of UNHCR staff, which makes up the IPMC makes a proposal to the Representative. The Representative accepts the proposal or proposes amendments or revisions. This process was run early in 2024 for the final year of the existing MYSP with the intent of rationalising partner numbers.*

<sup>127</sup> « Evaluation of UNHCR's Engagement in Situations of Internal Displacement (2019-23) », Teresa Hanley et al. 2024.

<sup>128</sup> The UNSDCF coincides broadly with the MYSP, for the period 2021 to 2025. It was signed between the UN and the FGS on 15 October 2020 and is the most important instrument for the planning and implementation of UN activities. It articulates the Somali Government's expectations of the UN and outlines the UN system's collective offer of support to Somalia. UNHCR has subscribed to the delivery of each one of its four outcomes.

<sup>129</sup> The African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) adopted in 2009 in Kampala (Uganda) is the first regional legally binding instrument in the world to impose obligations on states with respect to the protection and assistance of Internally Displaced Persons (IDPs). The African Union Convention on the Protection and Assistance of Internally Displaced Persons in Africa (commonly known as the Kampala Convention) should not be confused with the Kampala Declaration on Refugees. They are two distinct instruments within the framework of African governance of displacement. They differ significantly in terms of legal status, scope, population covered, obligations and purpose.

110. UNHCR supported the development of a national eviction guide, crucial for mitigating the risk of forced evictions in urban areas. This guide serves as a framework for local authorities, communities, and stakeholders, outlining the legal and procedural standards that must be adhered to when it comes to evictions. The quote inserted to the right points to this strength of UNHCR in a fraught context.
111. At the same time coordination in Somalia is far from coherent. The same evaluation confirms that the UNSDCF does not undertake direct engagement, which is determined by specific needs and context at FMS level. Somaliland does not recognize the UNSDCF and wants an alternative specific one. According to this evaluation, the UNSDCF CF has not facilitated operational alignment (“how to do business”) to foster harmonization of approaches. The UNSDCF CF Results Groups<sup>130</sup> have been busy with data gathering and have not worked on the development of technical guidance for key concepts such as Durable Solutions, and climate shock resilience. The Results Groups have not been merged with, for instance the Pillar working groups of the National Development Programme (which is government-led), Sector or Thematic groups (either government-led or development partner-led), or humanitarian cluster groups under the HNRP.
112. UNHCR’s central role in the IASC structures (through the three clusters), where field staff hold key positions in the coordinated response architecture, signals a continuation of this pivotal role into the operational and subnational sphere, including situational planning at the cluster level. Rapid assessments inform contingency plans at the subnational level. For example, following a needs assessment conducted with NRC during the Lasanood conflict displacement in Somaliland, over 2,700 IDPs were able to receive timely support, as was reported by UNHCR and verified in distribution observations.<sup>131</sup> Local NGOs play a crucial role in reaching conflict-affected areas, and mechanisms like the revamped PSMN enhance emergency response with timely flash alerts.

**JUCRI:** *UNHCR supported us in the development of eviction guidelines and shelter typology and guide. Without UNHCR, we would not have had these important documents, which are instrumental to the Luglow settlement scheme.*

## OPERATIONAL RESPONSE TO NEEDS

113. **Siloed programming, and insufficient expertise to engage with development actors limit the realization of the HDP nexus.** In Somalia, the UN has adopted the HDP nexus approach<sup>132</sup>, which, by aiming to bridge the gaps between humanitarian aid, development, and peacebuilding, has to be an integral part of any response. A recent evaluation<sup>133</sup> concluded, however that the development interventions have not been able to address the central drivers of emergencies in Somalia, and the humanitarian response did little to contribute to the livelihoods and resilience of affected people. That said, despite the in-country recognition of the HDP nexus approach, donor funding structures remain largely divided between peace, humanitarian and development windows. Furthermore, putting the nexus into practice beyond planning stages has been challenging, largely due to the absence of shared strategic and

<sup>130</sup> The UNSDCF CF Results Groups have primary responsibility for technical-level operationalization by translating outcomes into concrete, measurable, and time-bound output-level workplans. Results Groups discuss and coordinate programmatic interventions in their respective priority areas, and identify overlaps, gaps, and potential synergies, including joint programming opportunities, based on joint and multidimensional analysis and in collaboration with government partners.

<sup>131</sup> Norwegian Refugee Council, NFI Distribution report 2023.

<sup>132</sup> The UNCT in Somalia began operationalizing the Humanitarian-Development-Peace nexus approach in 2020. This initiative involved the establishment of three nexus task forces focusing on critical areas: Water Management (addressing droughts and floods), Durable Solutions for Displaced Persons, and Anti-Corruption. The formal adoption of the HDP nexus approach was further solidified with the signing of the UNSDCF 2021–2025 in October 2020.

<sup>133</sup> « Inter-Agency Humanitarian Evaluation of the Response to the Humanitarian Crisis in Somalia », Julia Steets et al., March 2025.

technical platforms where humanitarian, development, and peace partners can collaborate.<sup>134</sup> Consequently, interventions tend to be contained within each sector's specific mandates, and areas of expertise. The present evaluation did not find evidence that these adverse circumstances were overcome by UNHCR, due to factors presented below.

114. ABP is an approach that defines an area as the primary entry point, rather than a sector or target group. The HDP solutions are generally considered to be most valuable when linked to ABPs<sup>135</sup>, and to also include the fourth nexus element; resilience to climate change. It is particularly appropriate in areas with complex, inter-related and multi-sectoral needs. ABP has been translated in Somalia as Area-Based Coordination, transforming a contextual analysis into a system of interaction among UN and NGOs present in an area.
115. By virtue of its engagement around the centrality of protection, its extensive country footprint, and in leading three clusters, UNHCR in Somalia is uniquely positioned to combine life-saving interventions, including emergency shelter, provision of core relief items, and basic essential services. The evaluation case studies confirmed that it comes into its own in *de facto* area-based approaches when adjusted at the level of Sub-Offices and Field Offices, where its personnel is in a position to target individuals with higher protection risks. The strong (if occasionally fraught) government relationships allow it to play a convening role that builds on its relations with authorities at all levels. The burgeoning approach to ABP, especially in those cases where it extends beyond UN inter-agency coordination,<sup>136</sup> is an opportunity to link up the centrality of protection with local government, supporting life-saving efforts, and protection.
116. As indicated by a UNHCR internal note,<sup>137</sup> no analysis or policy papers have been shared regarding the ABC response, particularly related to hard-to-reach areas in Kismayo. ABC has mostly communicated and shared information on an ad hoc basis, while clusters and sub-national clusters regularly produce and share overall updates regarding the situation. Most cluster members in Baidoa and Galkayo view the ABC as a stand-alone structure, an adjunct with only a weak relationship with the cluster system.
117. The evaluation notes a distinction between the concept of ABC, which is being frequently discussed in the inter-agency humanitarian coordination mechanisms, and ABP (see in particular the evaluation questions on 'Use of Evidence' and 'Operational Response to Needs'). The starting point in ABP is not coordination, but careful contextual analysis and then reviews conducted to establish the nature of a possible international response. In ABP, following the initial analysis, the allocation of lead roles and coordination within the clusters, then becomes a pragmatic programme orientation, while the fundraising proposition is easier to aggregate to the national level, combining different ABPs together.
118. The prevalence of thematic priorities as opposed to area-based ones creates a challenge in responsiveness. Resource limitations and a lack of contingency funding, constrain preparedness efforts. While UNHCR demonstrates flexibility during emergencies, the rigidity in target setting within programming cycles hinders adaptive capacity.

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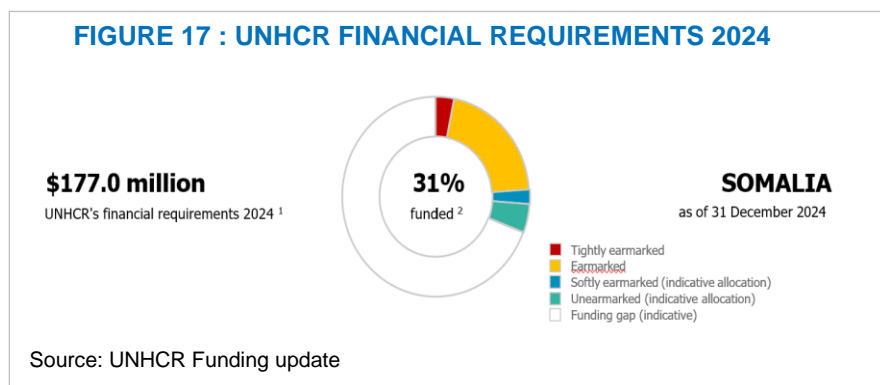
<sup>134</sup> Several interviews, as well as the Inter-Agency Standing Committee's Country Brief on the Humanitarian-Development-Peace Nexus 2024: Somalia, have highlighted the limitations stemming from the absence of a structured forum that systematically brings together humanitarian, development, and peace actors to conduct joint analysis and develop coordinated programmes.

<sup>135</sup> « Area-based programming in fragile-and conflict-affected contexts », Huma Haider, Overseas Development Institute, 2021. Also « Evaluation of EU Cooperation in South Sudan », May 2025, Emery Brusset et al.

<sup>136</sup> Area Based Programming (ABP) is an approach that focuses on specific geographical areas to address complex and interconnected needs, integrating various sectors and involving all local communities to improve development and social cohesion. Area Based Coordination has been used in Somalia in relation to the ABP approach, but concentrates on coordination mechanisms in a particular area, rather than the planning or the population dimensions.

<sup>137</sup> « Feedback on Area Based Coordination model: A field and cluster perspective », UNHCR Somalia.

119. As noted above in EQ1, UNHCR's ability to make large scale strategic changes are limited by budgetary constraints, and its multiple lines of accountability and legacy. As shown in the figure 17, the large majority of UNHCR funding is earmarked. Resource constraints limit scalability of the response in emergencies. Efforts such as semi-permanent housing align with protection goals but lack focus on employability and settlement. Decreasing budgets and societal barriers – for example clan-based discrimination and social fragmentation, gender inequality and protection risks, stigmatization and social exclusion<sup>138</sup> - hinder progress on durable solutions.



120. The partners have in emergency response, which is more area-defined than annual programming, some ability to adapt the programming that was made on an annual basis. UNHCR is generally open to considering alternative approaches proposed by partners in the emergency planning phase. For example, NRC suggested alternative approaches such as increasing support for some IDP camps depending on changes in camp population and perceived increased vulnerability, to which UNHCR was receptive after prior consultations.

121. Moreover, Somalia presents a continually unpredictable context. For example, the recent influx of refugees from Ethiopia due to escalating violence in Abudwaq has necessitated a reassessment of resource allocation and operational focus. The sheer scale of the situation has exceeded the current level of preparedness, as UNHCR only had 500 CRI kits available for over 5,000 displaced households. This points to the resource ceiling as a key constraint on adaptability.

122. Limitations within UNHCR funding and the absence of key entry points and levers for inclusion and self-reliance remain severely limiting. For example, opportunities for job creation are limited in Hargeisa as the local market lacks the capacity to absorb workers, and local communities are hostile to refugees from Ethiopia that make up over 60% of the refugees and asylum seekers in Somaliland. Both government and these refugees opted for the creation a refugee camp to enhance the safety of the refugees, especially those from Ethiopia.<sup>139</sup>

123. UNHCR staff mentioned development bank funding streams as a significant opportunity for expanding social safety nets for nexus working to support self-reliance, but also one calling for adjustments in project implementation, such as conducting due diligence studies. Evaluation stakeholders pointed out that UNHCR is at the time of writing on the point of signing an agreement for US\$19.7 million with AfDB which took nearly one year of negotiations (till

<sup>138</sup> See, for example:

Durable Solutions Unit of the Ministry of Planning, Investment and Economic Development, Federal Government of Somalia. The National Durable Solutions Strategy 2020-2024.

Somali Public Agenda, Regional Durable Solutions Secretariat (ReDSS); Marginalization and Social Cohesion among Minoritized Clan Groups and Dominant Groups, Aid Actors, and Local Authorities in Mogadishu. Scaling Solutions in Somalia Project (Danwadaag Durable Solutions Consortium in Baidoa, Kismayo and Mogadishu).

United Nations Somalia; durable solutions initiative. Integrated Office of the Deputy Special Representative of the UN Secretary-General, Resident & Humanitarian Coordinator for Somalia.

<sup>139</sup> This reflects a preference for refugee camps presented by both refugees and state officials for UNHCR's consideration. The authorities argue that refugees and asylum seekers have a negative impact to socio-economic and security issues of the country and are also a pull-factor to the extent that majority are considered economic migrants and others are looking to move to third countries. Refugees on the other hand have proposed to UNHCR to place them in camps as humanitarian aid shrinks, to manage the cost of living and also to enjoy benefits of refugees living in camps such as those in Ethiopia. UNHCR has communicated its position about encampment.

end of 2024) illustrating the difficulties in adaptation. In fact, development banks have different logics and mechanisms for planning and managing projects, which are agreed with member states; development bank funds that are channelled and managed through joint units created in the relevant sectoral ministries, controlled and disbursed through central banks, support sectoral reforms or infrastructure development that require long implementation periods. In general, the effects of long-term investments take time to reach the most in need communities, which frequently experience a reduction in humanitarian aid without having perceived the benefits of sectoral or structural reforms. Several CSEs<sup>140</sup> have documented the difficulty of harmonising the working approaches and mechanisms of development banks and UNHCR country strategies including in the context of the World Bank Group IDA Sub-Window for Refugees and Host Communities. The adoption of multi-annual strategic planning for UNHCR operations has been an important step in articulating the Triple Nexus in UNHCR operations, but the organisation's planning is still heavily influenced by an annual budgetary logic and annual planning mechanisms in a volatile operational environment.

124. Since 2020, UNHCR Somalia has established points of contact for cross-border coordination with Kenya, Ethiopia, Yemen and Djibouti by maintaining protection and population movement offices at key border points, such as Dhobley and Dolow, and facilitating regular meetings for planning and coordination. This collaboration supports data sharing and tracking of refugee populations, ensuring protection, timely assistance, and coordinated regional responses. However, insights into the effectiveness of these efforts are limited, except for the case of UNHCR Yemen, which has been able to provide background profiles on long-term Somali refugees in Yemen claiming, upon their return, to be refugees.
125. However, responding more effectively and predictably to the challenges of mixed movements requires a broader, route-based approaches.<sup>141</sup> Looking ahead, a comprehensive, targeted and coordinated approach as the one exemplified with Yemen involves the dedicated and sustained efforts of States, UNHCR, IOM, other UN agencies in ensuring safer and more dignified movement across multiple states and hazards, and would be relevant for a country of departure, like Somalia. The elements of the cross-border collaboration in UNHCR do not yet warrant this.

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<sup>140</sup> See, for example, Country Strategy Evaluations of UNHCR Mauritania, Mozambique, Ecuador, Peru, Brazil.

<sup>141</sup> «Strengthening protection and solutions in the context of mixed movements of refugees and migrants », UNHCR Explainer, 2024.



## EQ4. Contributions to Envisioned Results

The assessment of UNHCR's programme performance in Somalia is constrained by significant gaps and inconsistencies in monitoring and reporting systems. These deficiencies hinder the accurate measurement of programme effectiveness and present ongoing challenges to planning, evidence-based decision-making, and institutional accountability. These weaknesses have been documented in other CSEs,<sup>142</sup> but in the case of Somalia, they pose a critical risk to the organisation.<sup>143</sup>

Despite these limitations, the evaluation team can ascertain that UNHCR made several notable contributions during the evaluation period (2020–2024). Key achievements included its support for the development of national legal and institutional frameworks - most prominently, the adoption of the Refugee Law—and efforts to enhance the technical capacity of Somalia's National Commission for Refugees and Internally Displaced Persons. UNHCR undertook systematic measures to strengthen the national asylum system, including capacity-building initiatives targeting the National Commission, the simplification of asylum procedures, the prioritisation of cases involving vulnerable individuals, and the revision of standard operating procedures. However, despite these interventions, the asylum backlog remained largely unchanged, with 11,063 asylum seekers in Puntland still awaiting RSD as of the end of October 2023. The transfer of RSD responsibilities to the FGS was hindered by lack of dedicated UNHCR staff, political instability, a severe shortage of civil service personnel, procedural gaps in the RSD process, the absence of a dedicated public budget, and the regional fragmentation of asylum governance mechanisms.

Achievements have been documented in the distribution of CBI and CRI, which have been essential in facilitating access to basic services (health, education, shelter) and in enhancing economic resilience, especially for vulnerable profiles, although population coverage has been limited, especially regarding the large-scale needs of different population groups. UNHCR's and partners' response to GBV (one of the highest budgeted outcomes of the operation, accounting for 17% of total OL between 2021 and 2024) has improved awareness and case referral mechanisms but does not appear to have significantly mitigated or reduced the persistence of GBV-related risks, especially among displaced girls and women. In general, the provision of basic services such as health, and education has been dependent on funding from UNHCR (and other actors), which, combined with the difficulties in developing national systems and capacities, poses a challenge to sustainability in the face of increasing budget cuts and the persistence of forced displacement.

UNHCR's work to improve access to livelihoods for different population groups, both through interventions and through its catalytic role since 2023, has helped to raise awareness about the economic inclusion of forcibly displaced persons in national policies and mobilise local actors (e.g public administrations, private sector, chambers of commerce). However, UNHCR's efforts to enhance self-reliance through livelihood interventions have been limited by an unfavourable macroeconomic situation, a predatory informal economy, misconceptions by some refugees who think that if they accept the cash grants for livelihood they will not be considered for resettlement, or for other future cash assistance programmes. Other factors that have also negatively impacted support to self-reliance refer to an underdeveloped private sector and contextual barriers including access

<sup>142</sup> See, for example, UNHCR's Country Strategy Evaluations of Mozambique, Mauritania, Tajikistan, Mexico, Ecuador, Peru, Brazil.

<sup>143</sup> OIOS internal audit division; Reports 2020/052 and 2024-01902. Audit of the operations in Somalia for the UNHCR in 2020 and 2024.



to land as a fundamental means of livelihood for many communities. Consequently, dependency on aid to meet basic needs remains a reality among FDP and their hosts.

UNHCR has been under pressure due to the need to combine emergency humanitarian assistance (which has absorbed most of the budget and resources) with the promotion of self-reliance, which requires resources, expertise, specialised partnerships, strong nexus working and stable medium-term planning all of which has been challenging in the volatile and complex national context that makes Somalia.

## ACHIEVEMENT OF INTENDED RESULTS

126. **Quantitative measurement and assessment of UNHCR's results at output and outcome levels been severely limited by the variability of UNHCR's annual monitoring framework, inconsistencies in UNHCR's reporting system and contradictory data from UNHCR's annual reporting, RMSs and information from other sources.** For these reasons, the analysis of quantitative results data is mainly based on the 2022 and 2023 RMSs. Where possible, the evaluation team draws upon planning, monitoring and annual reporting data, alongside other surveys to support its results assessment. The evaluation team notes that available documentation of results achievements exemplifies an operation management reality that contrast visions for RBM and knowledge management as these are formulated in the 2023-25 MYSP as : “Despite the volatile security situation and as conducted in recent years, the Somalia operation will adopt a coordinated, participatory, and inclusive monitoring and evaluation approach for the different results and thematic areas at varied levels [...].UNHCR Somalia will strengthen collaboration with, inter alia, UNDP, WFP, FAO, UNFPA, UNICEF, ILO, and the World Bank for strategic joint programming.”<sup>144</sup>
127. UNHCR monitoring and reporting contain significant gaps; inconsistencies, which constrain adequate management and evaluation. Several sources<sup>145</sup> point out the weaknesses in UNHCR monitoring and challenges associated to the quality of UNHCR and partner data. UNHCR's performance data issues in Somalia were reiterated in the 2017, 2020 and 2024 OIOS audits in relation to which no effective action has been taken. In addition to the abovementioned challenges, many of its monitoring output indicators change in definition from one year to the next. While some changes are understandable given the volatility of UNHCR's operational and budgetary context, the annual changes make it impossible to analyse the evolution of the indicators over time. For example, of the 41 output indicators planned and self-reported in 2022, only 24 indicators are tracked with continuity in 2023, making it difficult to compare the two years. In 2023, a small number of outputs with OL budget are not reported.<sup>146</sup>
128. The vast majority of annual monitoring indicators reported by UNHCR show values over 70% of achievement and, in some cases over 100%, suggesting a need to provide narrative reporting to explain changes that the annual reports present in a limited way<sup>147</sup>. UNHCR

<sup>144</sup> Section 2.2 Experience and Lessons Learned.

<sup>145</sup> OIOS audits, interviews, participatory assessments in the case studies - although others, such as the IAHE, point to wider systemic causes.

<sup>146</sup> See Desk review, based on UNHCR annual reporting data provided to the evaluation team by UNHCR EvO in Excel files (available on UNHCR's Somalia CSE SharePoint). UNHCR: Indicator Download 2022 2023.

<sup>147</sup> Frequently, UNHCR's annual reports (2020, 2021, 2022, 2023) do not elaborate on the achievement (or lack of achievement) of indicators and on inter-annual variations. In general, UNHCR's annual reports refer to contextual factors and resource constraints to explain difficulties in achieving planned targets. (for example limited livelihood opportunities, insecurity and violence, delays in national legal or institutional changes - for example national asylum law, GBV, child protection -, funding constraints, limited staff capacity). While it is understandable that the complexity and volatility of the operating environment in Somalia has an impact on implementation, UNHCR's annual reports do not provide accurate explanations for the values of the indicators reported. In addition, many of the monitoring indicators change from year to year, limiting the analysis of trends for similar activities or outputs (for example shelter provision) over the period under

reporting, especially in 2022 and 2023 shows inconsistent or unexplained annual variation, as documented in the evaluation desk review. For example, registration figures show a 100% achievement while a significant backlog of around 60% of the asylum seeker population did not register.<sup>148</sup>

129. UNHCR's achievements reflected in its monitoring system and the data from the RMSs show opposite results; while UNHCR's regular monitoring shows very positive indicator measurements, the RMSs show a deterioration.<sup>149</sup> Therefore, below the evaluation has used other sources and methods of data collection to complement or reinforce the analysis of effectiveness with qualitative data, considering the limitations of the quantitative data available for most UNHCR interventions. Specifically, for the IDP response, observations from the field, including in-depth interviews with partners contradict the perceptions of highly effective programming that come with 100% achievement of targets.
130. In addition, case study visits at field level, including interviews with partners, indicate that small and dispersed contract sizes have an impact on the ability of UNHCR partners to deliver results. In Dollow, UNHCR, through one of its partners, was delivering outputs aimed at supporting IDP abilities to self-sustain. This included vocational training (tie-dyeing) for 29 women and the provision of small livestock (goats) to 30 households, (families prioritised using vulnerability criteria). Partners pointed out that the families who received inputs represented a tiny fraction of the approximately 400,000 IDPs in and around their IDP settlement in question. The potential impact of recipient families could be considered relatively high, but because of the scale of the intervention, the overall impact on the population has been minimal. Given the reduced funding environment, considerations on scale to impact should be one important parameter that can guide prioritization of investments including in staff time.
131. **The analysis of the UNHCR Somalia Risk Registers indicates that while risks are adequately identified, their severity is often understated compared to the assessments made by OIOS auditors. This discrepancy has limited the operation's responsiveness in implementing timely and proportionate measures to mitigate situations that pose reputational and strategic risks to the organization and to proactively adapt its operational planning and implementation.** For instance, risks such as implementing partner management, cash-based interventions (CBI), core relief items (CRI) delivery, service quality, and refugee status determination (RSD) were consistently rated as medium in UNHCR's internal registers but were assessed as critical in the OIOS audits. Although fiduciary threats were acknowledged, the internal risk registers appeared to overestimate the effectiveness of existing controls—particularly those reliant on third-party monitors and implementing partners with limited oversight capacity. Additionally, the registers gave insufficient weight to the mounting challenges in sustaining donor financing, which continued to be categorized as a medium-level risk despite its potential to significantly undermine operational continuity. The 2024 OIOS audit also highlighted the lack of measurable indicators and outdated standard operating procedures in core areas such as CBI and health service delivery, which were not reflected in the corresponding risk ratings. Moreover, while the audits emphasized protection concerns such as inadequate GBV response mechanisms and the absence of case management SOPs, these were either missing or downplayed in the risk registers.

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review. As an example, Outcome 9 (Housing) has three monitoring indicators in 2022 and five in 2023 with unexplained year-to-year variations. Outcome 9 (Housing) in 2023 presents a duplicate indicator (number of PoC receiving emergency shelter) with completely different values (4,920 and 24,420 persons) without detailed analysis. Similar limitations are found in other outcomes.

<sup>148</sup> Information provided by EvO and interviews and mentioned in several UNHCR documents. See, for example: UNHCR annual reports (2022, 2023, 2024), UNHCR Somalia - Risk Register Tool, UNHCR Strategy report Somalia ABC Multi-year 2023-2025 Internal Document for Country/MCO Operations. See also OIOS internal audit division, Report 2024-01902. Audit of the operations in Somalia for the UNHCR.

<sup>149</sup> UNHCR Somalia Results Monitoring Survey (RMS) report (2022, 2023).

132. **UNHCR support to the Refugee Act has provided a stronger legal and institutional basis for improving key areas of the functioning of the national asylum system, which may now allow refugees and asylum seekers access to documentation and travel documents (one of the main obstacles faced by this population in past years).**
133. UNHCR secured the adoption of the Somaliland Refugee Act in April 2023 and the Federal Government of Somalia Refugee Act in 2024. It strengthened the technical capacity of the NCRI, although there is still some way to go to extend its application to the different regional states, with their own regional commissions and regulatory capacities. UNHCR's sustained work with national institutions since 2019 has overcome protracted electoral periods, political uncertainty and the reorientation of government priorities in the face of drought, and it has been instrumental in providing Somalia with a legal framework aligned with regional (for example OAU Convention, Nairobi, Mombasa and Kampala Declarations<sup>150</sup> and other IGAD instruments) and international standards (for example Geneva Convention, Global Compact on Refugees, Comprehensive Refugee Response Framework).
134. Despite UNHCR's institutional and technical accompaniment, and the worsening numbers of internal displacement and risk of statelessness, progress on the IDP Act and the Statelessness Act has been partial. Since 2019, UNHCR has been providing technical assistance to the Federal Government of Somalia to draft legal texts related to the IDP Act and the domestication of the Kampala Convention.<sup>151</sup> While previous efforts (IDP Law 2020, National Protection Policy for Refugees, IDPs and Returnees) did not progress beyond the drafting stage, UNHCR supported the efforts of the NCRI to draft the IDP Law 2022, which was approved by the Council of Ministers and has been under discussion in Parliament since 2023.<sup>152</sup> UNHCR reports<sup>153</sup> indicate that elections, political transitions, shifting priorities, and drought-related challenges have contributed to delays in the approval of the IDP Act. Other sources<sup>154</sup> highlight additional obstacles, including Somalia's complex legal landscape—comprising secular law, Shari'a law, and customary clan-based systems—which creates conflicts in legal interpretation and application. Limited government capacity has also been identified as a significant barrier to advancing the legislative process. The new IDP law could be a milestone in securing and protecting the more than 3 million registered IDPs in Somalia.<sup>155</sup> In relation to statelessness, and as part of UNHCR's global campaign “#I Belong” and Somalia's commitments at the Global Refugee Forum, UNHCR (together with IOM and other actors) supported the development of the National Action Plan to End Statelessness in Somalia 2021 - 2024 and the study on Statelessness and Citizenship in the Horn of Africa.<sup>156</sup> However, the necessary instruments for a thorough revision of the legal framework (Citizenship Bill, Civil Registration and Vital Statistics Bill) have been in a long parliamentary process since 2023.

<sup>150</sup> The Kampala Declaration on Refugees (Kampala Declaration) refers to a non-binding political declaration adopted in 2017 during a Special Summit of the Intergovernmental Authority on Development (IGAD), held in Kampala (Uganda). It was convened in response to the large-scale refugee movements in the Horn of Africa, particularly driven by the protracted crisis in South Sudan, and is often referred to in connection with regional efforts to implement the Global Compact on Refugees.

<sup>151</sup> The African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa (Kampala Convention) adopted in 2009 in Kampala (Uganda) is the first regional legally binding instrument in the world to impose obligations on states with respect to the protection and assistance of Internally Displaced Persons (IDPs).

<sup>152</sup> UNHCR Executive Committee 2024. Speech by Somalia's Deputy Minister [https://www.unhcr.org/sites/default/files/2024-10/25-Somalia.pdf].

<sup>153</sup> UNHCR Annual Reports (2021, 2022, 2023).

<sup>154</sup> Mubarik Mohamoud (2024) Somalia's New Draft IDP Law: Addressing a Complex Humanitarian Crisis. Regional Durable Solutions Secretariat (ReDSS).

CCCM Cluster Somalia, Norwegian Refugee Council, Protection Cluster Somalia, Housing, Land, Property AoR Somalia, Somalia Shelter Cluster (2024) Somalia Joint Advocacy Paper, Brief November 2024.

<sup>155</sup> Estimated 3,861,643 IDPs in Somalia in May 2024, according to UNHCR's operational data portal

[https://data.unhcr.org/en/country/som].

<sup>156</sup> Bronwen Manby (2021) Citizenship and Statelessness in the Horn of Africa. UNHCR.

## Registration

135. **Joint work between UNHCR and the FGS has ensured some level of access to territory, freedom of movement, registration and verification of asylum seekers and refugees, and a high level of access to documentation. However, systemic constraints in the national asylum system continue to make it difficult to ensure access to asylum procedures and address the chronic backlog of asylum applications.**
136. The roll-out of the Biometric Identity Management System and joint UNHCR and Government registration exercises in several regions of Somalia (South-Central Somalia, Somaliland and Puntland) has facilitated collection of data on refugees and asylum-seeker profiles and their specific needs, and provision of recognised identity documents or credentials.<sup>157</sup> These documents have reduced the risk of abuse and harassment, and UNHCR has been able to intervene in those cases identified as being at risk of deportation.<sup>158</sup>
137. In addition, UNHCR and partners (IGAD) have supported capacity building of national commission officials, for example, legal officers, protection officers, RSD officers. In this context, UNHCR achieved remarkable results in terms of facilitating access to documentation. According to the 2023 RMS, the organisation achieved 100% of its target related to provision of recognised identity documents and credentials to asylum-seekers, refugees and returnees in a single year (from 2022 to 2023),<sup>159</sup> even with an annual reduction of 79% in the OL budget.<sup>160</sup>
138. The RMSs<sup>161</sup> also reported 100% access to documentation for IDPs in 2023 (against 19.5% in 2022). However, UNHCR's 2023 regular reporting continued to highlight limitations in registration (as there are only registration points in two locations) and ongoing difficulties in accessing documentation for a proportion of the population, affecting access to housing and land. In other words, UNHCR's reported figure of 100% for the access to documentation is inconsistent with the reported backlog figures, exemplifying the gaps in UNHCR's monitoring and reporting system described above.
139. With regard to RSD, UNHCR reports a persistent backlog, which, despite initiatives to reduce it (for example capacity building of the national commission, simplified procedures, prioritisation of vulnerable cases, revision of SOPs), remained constant throughout the evaluation period.<sup>162</sup> In fact, problems with the backlog were already highlighted in the previous 2020 OIOS audit.<sup>163</sup> and the measures that UNHCR should have implemented by March 2021, do not appear to have taken place, or to have been effective. Furthermore, access to an effective appeal mechanism, which was reported at 100% in 2022, dropped to 10.25% in 2023, and access to legal representation also dropped from 100% to 0% in the same period.<sup>164</sup> UNHCR reports repeatedly reflect the challenges faced in transferring the RSD to the FGS, and the limitations of the national asylum system related to political instability, critical shortage of civil servants, gaps in the RSD process, absence of a specific public budget, and regional fragmentation of the asylum system, among others.

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<sup>157</sup> The Biometric Identity Management System was introduced in Somalia in 2019 and has been implemented gradually.

<sup>158</sup> In 2023, only four cases of refoulement known to UNHCR. UNHCR reports that freedom of movement is at 100% of the asylum seekers and refugee registered population. However, for the unregistered and undocumented, movement remains limited.

<sup>159</sup> The proportion of refugees with recognised identity documents was high in the RMS 2022 (82.9%), but much lower for refugee returnees (58.2%) and asylum seekers (47.0%), representing considerable progress in a short period of time.

<sup>160</sup> OL budget for outcome area Access to documentation (Pillar 1 refugees and asylum seekers) decreased from US\$4 million in 2022 to US\$888.972 in 2023.

<sup>161</sup> UNHCR Somalia Results Monitoring Survey report 2023.

<sup>162</sup> As of October 2023, there was a backlog of 11,063 asylum seekers awaiting RSD processing in Puntland (OIOS audit 2024). The average processing time (in days) from registration to first instance asylum decision was 148 days in 2022 (UNHCR Annual Results Report 2022). The average processing time (in days) for 2023 was 1,346 days, which is probably a reporting issue.

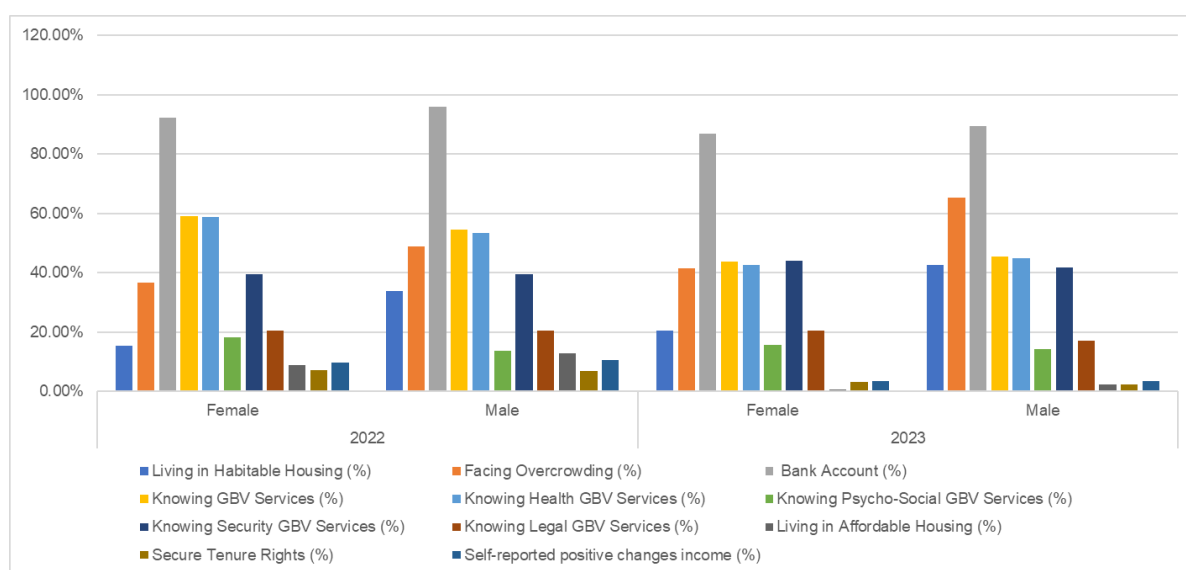
<sup>163</sup> OIOS internal audit division, Report 2020/052. Audit of the operations in Somalia for the UNHCR.

<sup>164</sup> UNHCR annual reporting 2022, 2023.

## Gender Based Violence

140. As relating to OA4 GBV<sup>165</sup>, the overall analysis of gender inequalities in the RMSs<sup>166</sup> shows greater gender disparities in living conditions, and access to housing. The proportion of respondents with a bank account remained high across both years and genders, with males only slightly outperforming females. On the contrary, a higher proportion of female respondents know where to access GBV<sup>167</sup> services compared to male respondents. The analysis of gender inequalities was limited by the scarcity of available data and relied mainly on the RMSs, despite limitations in the comparability of the two RMSs datasets.<sup>168</sup> The analysis of the gender-disaggregated RMSs indicators (see figure 18 below) shows that women consistently had higher levels of awareness of psychosocial and legal GBV services. these results suggest that, despite declining access, women maintained a relative advantage regarding their knowledge of support-related services. in addition, overcrowding - a negative housing condition - was more prevalent among men in both years. in other areas, men outperformed women in several indicator measurements related to economic stability and living conditions. the RMSs measurement of the indicator access to habitable housing<sup>169</sup> was significantly higher for men. secure tenure rights declined for both genders. changes in income followed a similar pattern although both genders experienced a significant decline, women show lower income levels. in addition, access to financial accounts was consistently higher for men. these trends highlight persistent gender disparities in economic resilience and housing security, and underscore the need for targeted, gender-responsive interventions.

**FIGURE 18: SUMMARY OF RMS KEY INDICATORS BY YEAR AND GENDER (2022-2023)**



Source: UNHCR RMSs data sets made available to the evaluation.

141. UNHCR has mobilised significant resources to respond to GBV and, together with other organisations, has implemented relevant awareness-raising, risk prevention and assistance to survivors' actions, but it has not documented improvements in the

<sup>165</sup> "Forcibly displaced and stateless people will have improved access to services in addressing risks of violence, exploitation and abuse"

<sup>166</sup> Analysis of Result Monitoring Survey as part of the Country Strategy Evaluation - UNHCR Somalia (Desk review).

<sup>167</sup> See section on gender-based violence below for more details.

<sup>168</sup> Analysis of Result Monitoring Survey as part of the Country Strategy Evaluation - UNHCR Somalia (Desk review)

<sup>169</sup> "Access to habitable housing" is a COMPASS indicator to measure the outcome "Sustainable housing and settlements". It is reported as such in the RMSs and in other UNHCR documents.



**reduction of violence affecting women and girls.** UNHCR's funding (OL) for gender-based violence represents one of the largest percentages of the operation's budget (17% of total OL 2022 - 2024 and 26% of total OL 2022 - 2024 for Pillar 4 IDPs). The prioritisation of GBV reflects the seriousness of one of the main protection challenges in Somalia. Available data indicate that GBV is worsening (particularly in IDP camps), the legal framework for the protection of survivors is regressing,<sup>170</sup> and female genital mutilation, domestic abuse and child marriage remain serious and persistent problems.<sup>171</sup>

142. UNHCR has worked with all populations (including host communities), community leaders and specialised service providers to raise awareness of GBV and gender equality, and it has invested annually in improved shelter facilities and sites also in support of GBV prevention. UNHCR also provided support to survivors (health, legal, psychosocial) and established emergency response, referral and case management services. For example, in 2022, UNHCR assisted 50,665 survivors, and in 2023, a total of 14,921 people were provided with GBV services. In 2023, cash assistance was incorporated as part of a broader protection approach to GBV survivors.<sup>172</sup>
143. As the lead agency for the Protection cluster, UNHCR played a key coordinating role, supported inter-agency mechanisms for GBV prevention and response, and collaborated with the United Nations Fund for Population Activities (UNFPA) in the "GBV Area of Responsibility". UNHCR's engagement included protection monitoring, programmatic interventions, risk mitigation, policy advocacy, and played a critical role in strengthening GBV data systems (Gender-Based Violence Information Management System). However, no specific actions, progress or data were identified in relation to female genital mutilation, which UNHCR participatory assessments identified as the main protection risk for women and girls. This is attributed by UNHCR staff to the overwhelming cultural pressures in the country and the fact that UNFPA and the United Nations Children's Fund (UNICEF) have taken this work forward, although the Policy on UNHCR's engagement in situations of internal displacement<sup>173</sup> states that UNHCR, in its operational capacity, will ensure a community-based protection approach and prioritise interventions to prevent, respond to and mitigate the most urgent and immediate protection risks and needs, including GBV.
144. In terms of case management, available data sources are inconsistent. UNHCR's measurement of the indicator *Proportion of survivors who are satisfied with GBV case management services* shows positive values in 2022 (100% for all populations) and 2023 (79.13% for IDPs and 93.01% for refugees and asylum-seekers).<sup>174</sup> However, UNHCR's participatory assessments report a stagnation in the reporting of sexual exploitation and abuse, i.e., victims who do not trust that their complaints will be taken seriously and who believe that there will be repercussions.<sup>175</sup> The OIOS 2024 audit, for its part, also reports gaps in UNHCR's GBV service delivery and prevention and country gender strategy.
145. At the level of the protection environment and legal framework, UNHCR, in its capacity as co-chair of the Interagency PSEA Network, has contributed to UN-HCT standard operating procedures and policies and worked with national institutions (for example Ministry of Women and Human Rights Development) to strengthen policy design, capacity building and advocacy.

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<sup>170</sup> According to the Somalia Humanitarian Needs and Response Plan 2025 : Multiple displacements due to flooding, droughts, armed conflict and inter-clan violence is worsening GBV risks, particularly for women headed HHs, divorced/widowed women, those with disabilities and from minority clans. Severe food insecurity further heightens the vulnerability of women and girls, exposing them to increased risk of sexual violence, abuse, exploitation, and intimate partner violence. Recent reports indicate slight decreases in intimate partner violence (IPV) and rape from 2023 to 2024, however, recurrent displacements heighten GBV incidences within IDP camps.

<sup>171</sup> UNHCR Participatory assessments.

<sup>172</sup> UNHCR Annual Results Report Somalia ABC (2022 and 2023); internal version.

<sup>173</sup> See Policy on UNHCR's engagement in situations of internal displacement, chapter 6.2. Delivering a protection and solutions response.

<sup>174</sup> UNHCR Annual reports 2022, 2023.

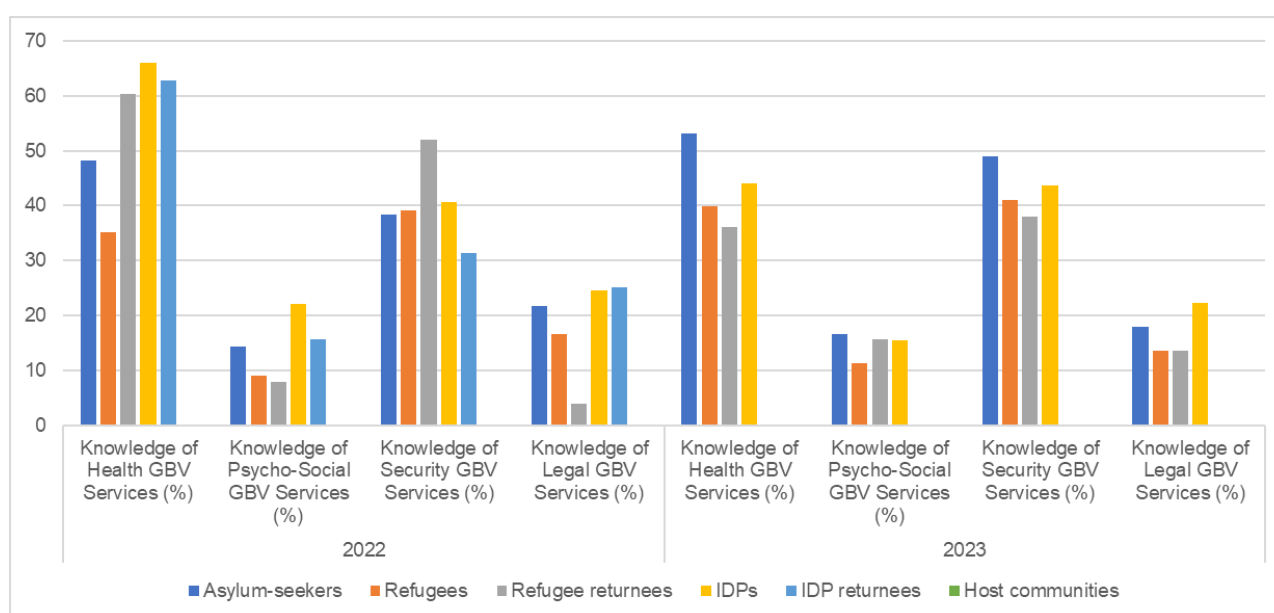
<sup>175</sup> UNHCR Somalia Participatory assessment report Sept 2023; external version.



However, despite interagency efforts, no progress has been reported in the revision of an outdated national legal framework (for example Sexual Intercourse Related Crimes Bill, Penal Code) and the response to impunity called for by specialised organisations.<sup>176</sup>

146. Analysis of RMSs 2022 and 2023 GBV indicators in (see figure 19 below) shows that, in 2022, a higher proportion of female respondents (59.2%) reported knowing where to access GBV services compared to male respondents (54.5%). However, in 2023, there was a notable decrease for both genders, with 43.8% of females and 45.5% of males reporting awareness of GBV services. The main predictors<sup>177</sup> of awareness of GBV services are access to water, income and safety-related variables, suggesting that targeted interventions to improve basic services and perceptions of safety may have a positive impact on awareness of GBV services. Improving access to health care and sanitation also appears to play a critical role in raising awareness.<sup>178</sup>

**FIGURE 19: RMS SELECTED INDICATORS ON GBV (2022-2023)**



Source: UNHCR RMSs data sets made available to the evaluation.

## Child protection

147. **Child protection began to receive dedicated attention in the country strategy only from 2023 onwards, when a specific outcome with a budget (OL) was established. This is so, even though children make one of the most vulnerable population profiles, especially girls who are victims of violence, child marriage, abuse and female genital mutilation. Furthermore, from the 2023 RMS indicator measurements have a very limited scope suggesting that UNHCR's child protection interventions have been few and narrow, and possibly that UNICEF has played a key role as lead agency of the Somalia's Child Protection Area of Responsibility.**

<sup>176</sup> Strategic Advocacy for Human Rights. Somalia's Call for Legal Reform: Addressing Gender-Based Violence [<https://www.wearesahr.org/blog/somalias-call-for-legal-reform-addressing-gender-based-violence>].

<sup>177</sup> From a statistical point of view, a predictor is a variable (also called independent variable, explanatory variable) that is used to estimate or forecast the value of another variable, commonly called the outcome, response, or dependent variable. In this case, the main predictors are: access to water, income and safety-related variables. The response (or dependent variable) is awareness of GBV services. The predictors may or may not have a causal relationship with the outcome or response.

<sup>178</sup> Analysis of Result Monitoring Survey as part of the Country Strategy Evaluation - UNHCR Somalia (Desk review)

148. The UNHCR Somalia Child Protection Strategy 2020-2022 structured UNHCR's interventions around three objectives (i.e., inclusion in national child protection systems, case management, well-being). However, based on the available data, the Child Protection Strategy appears not to have been accompanied by specific funding. In 2024, the OL budget for the child protection outcome is the second lowest in the operation (2%), although activities in previous years were spread across other outcomes and budget lines. The actions implemented in 2023 were aimed at mapping risks at community level (in selected pilot sites), supporting some cases and organising training on Best Interests Procedures. Monitoring indicator<sup>179</sup> measurements for 2023 show a very low level of target achievement (just over 1%). Child protection risks arising from limited access to civil registration show some exacerbation, as the two RMSs reports show a decrease in the percentage of children whose births are registered with the civil authority.<sup>180</sup>

149. UNHCR leads the Protection cluster in Somalia, which encompasses the Somalia's Child Protection Area of Responsibility led by UNICEF. UNHCR's Somalia Child Protection Strategy envisaged its implementation through joint actions between UNHCR and other partners (although it does not provide details of partners, complementarities or joint working mechanisms). However, the evaluation did not identify any structured collaboration between UNHCR and UNICEF, in line with the joint actions undertaken under the Blueprint for Joint Action for Refugee Children in other countries in the sub-region (for example Ethiopia), or other specialised organisations.

#### Shelter and tenure rights (HLP)

150. **UNHCR has played a key role as co-leader of the CCCM and Shelter clusters. However, UNHCR's (and the clusters') efforts have been limited by a chronic low level of funding compared to the needs, resulting in low population coverage and partial and, relatedly, sub-optimal implementation of UNHCR's shelter strategy in Somalia.**

151. Between 2021 and 2024, the Shelter cluster secured funding for UNHCR interventions from CERF allocations<sup>181</sup> through the cluster architecture, which enabled it to respond to shelter needs in priority locations. However, CCCM funding has been low throughout the period (ranging from 15.1% to 31.6% coverage of estimated needs),<sup>182</sup> which has had negative implication especially in light of the enormous and growing needs.<sup>183</sup>

152. According to the Somalia Humanitarian Needs Overview 2023, approximately 2.6 million internally displaced persons (IDPs) were identified as being in need of shelter assistance. During the same year, humanitarian organizations within the Somalia Shelter cluster provided shelter support to around 1.3 million IDPs, meeting approximately 50% of the total identified shelter needs. In terms of coverage, UNHCR provided 4,070 emergency shelters, 373 transitional shelters, and 323 durable shelters, reaching a total of 28,572 displaced individuals in 2023—representing a 28% decrease from 2022. This response accounted for only 0.6%<sup>184</sup> of the total shelter needs of IDPs in Somalia. Within the broader Shelter cluster response, UNHCR's contribution constituted about 2% of all shelter assistance delivered by humanitarian actors. Based on priorities and the needs of the forcibly displaced, and at the decision of the HC/HCT, the CCCM cluster was not allocated any funding from CERF and SHF throughout

<sup>179</sup> Monitoring indicators reported in UNHCR Somalia Annual reports: Proportion of children participating in community-based child protection programmes and proportion of unaccompanied and separated children in alternative care.

<sup>180</sup> See section on education.

<sup>181</sup> CERF Allocations by Country [<https://cerf.un.org/what-we-do/allocation-by-country>].

<sup>182</sup> Somalia Humanitarian Needs and Response Plans 2020 -2024 [<https://fts.unocha.org/plans/1180/clusters>].

<sup>183</sup> According to CCCM Somalia cluster dashboards:

2021: 2.9 million IDPs in Somalia, 1.8 million IDPs targeted by CCCM, 1.25 million reached (cluster partners).

2024: 3.8 million IDPs in Somalia, 2.7 million IDPs targeted by CCCM, 1.4 million reached (cluster partners).

<sup>184</sup> OIOS internal audit division, Report 2024/01902. Audit of the operations in Somalia for the UNHCR.

2024. In 2023, the CCCM cluster was allocated US\$19.2 million with few UNHCR implementing partners benefitting.

153. Despite these challenges, UNHCR successfully co-coordinated sixteen organizations active within the CCCM Cluster, supporting interventions in 292 IDP sites across 38 districts. This represents a portion of the 3,028 sites across 49 districts identified in the Detailed Site Assessment of February 2023).<sup>185</sup> UNHCR also conducted safety audits (monthly risk assessments) and site verifications to generate accurate population data and support regular site improvements—such as lighting, sanitation, flood preparedness, safety enhancements, and cash-for-work interventions, among others. The joint efforts of UNHCR and CCCM organisations under the National Solutions Pathways Action Plan 2024-2029<sup>186</sup> have contributed to a more comprehensive and solutions-oriented approach in certain settlements. Of these, Luglow (Kismayo) emerges as the best-documented case, offering insights into the potential of integrated settlement strategies<sup>187</sup>. In Luglow, the settlement was designed to accommodate both returnees and IDPs (about 70% of the population) and economically disadvantaged members of the host community (30% of the population). The settlement was developed with key social infrastructure (for example educational facilities, health services, a market and vocational training activities).<sup>188</sup> This approach has helped to improve social cohesion among returnees, IDPs and host communities, while providing limited but relevant livelihood opportunities. Nevertheless, challenges remain, particularly in terms of access to and quality of health and education, land tenure security and coordination with local institutions.<sup>189</sup> Despite these constraints and its limited scope, the Luglow case illustrates the potential synergies of an integrated shelter, livelihoods and protection approach.
154. On the other hand, various sources point to weaknesses in UNHCR's shelter interventions such as poor-quality standards,<sup>190</sup> very low target achievement<sup>191</sup> and persistent insecurity in the shelters.<sup>192</sup> The RMS 2023 indicator measurement relating to physically safe and secure settlements are low for all population categories (ranging from 0.10% for IDPs to 2.4% for refugees). In addition, various UNHCR reports<sup>193</sup> highlight challenges the organization has faced in scaling up its shelter response. Partners noted that UNHCR was not working effectively with other actors to ensure that shelter interventions were well-integrated with related programmatic areas, such as water, livelihoods, and other essential services. The RMS reporting on access to habitable housing reveals a significant disparity between asylum seekers and refugees—who report the highest levels of adequate housing—and internally displaced persons (IDPs), who show markedly lower percentages, indicating more severe shelter inadequacies among IDP populations.
155. Reported overcrowding remains a significant issue, particularly among IDPs, who reported consistent levels of overcrowding above 60% in both years. The following figure 20 shows selected indicators from the RMS surveys (2022 – 2023).

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<sup>185</sup> CCCM Cluster and REACH. Detailed site assessment, Somalia, February 2023.

<sup>186</sup> Ministry of Planning Investment and Economic Development, Federal Government of Somalia.

<sup>187</sup> UNHCR Annual reports 2022, 2023; and UNCT Somalia report February 2025.

<sup>188</sup> These skills are provided by the Social-life and Agricultural Development Organisation.

<sup>189</sup> Ahmed, A., Mohamud, F., and Wasuge, M. June 2023. 'Examining the durable solutions capacity in Kismayo and Afgoye'. London: EU Trust Fund for Africa (Horn of Africa Window) Research and Evidence Facility.

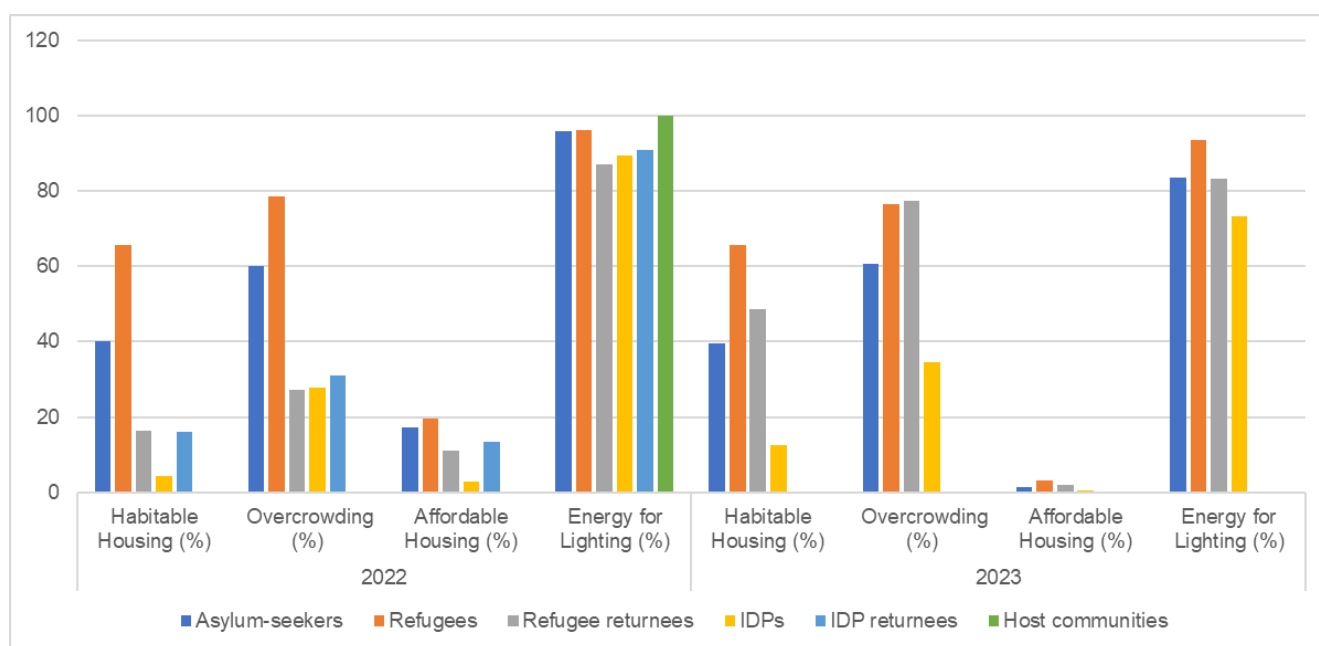
<sup>190</sup> OIOS internal audit division, Report 2024-01902. Audit of the operations in Somalia for the UNHCR.

<sup>191</sup> UNHCR Annual reports (2022, 2023).

<sup>192</sup> UNHCR RMSs (2022, 2023).

<sup>193</sup> See, for example, UNHCR Somalia Annual Reports (2021, 2022, 2023), and UNHCR Somalia Results monitoring Survey (2022, 2023).

**FIGURE 20: RMS SELECTED INDICATORS - SHELTER (2022-2023)**



Source: UNHCR RMSs data sets made available to the evaluation

## Basic needs

156. **Multi-purpose CBIs and CRIs have been UNHCR's main response to chronic and emerging humanitarian in Somalia, reducing the risk and vulnerability of thousands of people (26,944 refugees and asylum seekers, 2,463 returnees, and 169,989 IDP during 2022 and 2023) and facilitating access to essential services (shelter, education, health, nutrition), in particular for some vulnerable profiles and critical cases.**

157. The funds allocated to CBI (under the wellbeing outcome) represent the highest volume of expenditure of the operation (14% in total 2022-2024<sup>194</sup>), which is aligned with the needs of the population (i.e. three critical needs<sup>195</sup> repeatedly highlighted by different population groups - food, shelter and livelihoods).<sup>196</sup> The use of CBI has also contributed to the schooling of refugee children (albeit with modest population coverage<sup>197</sup>), procurement of essential relief items, resettlement of GBV survivors and access to shelter for critical cases. The prioritisation of multi-purpose CBI was in line with Regional Office guidance to increase the use of CBI and advance the implementation of CashAssist. UNHCR revised the CBI management SOPs to improve standards and processes. UNHCR's monitoring indicators show a positive achievement of CBI targets for the returnee, refugee and asylum-seeker populations<sup>198</sup> in 2022 and 2023, and the results of the post-distribution monitoring surveys show high levels of beneficiary satisfaction with both CBI<sup>199</sup> and NFI.<sup>200</sup> However, resource constraints did not

<sup>194</sup> It also represents one of the highest levels of CBI spending among the countries covered by the Regional Bureau (EHAGL CBI Directions 2024).

<sup>195</sup> 99% (2023) and 89% (2024) of respondents to PDM surveys reported indicated that the cash assistance enabled them to buy more food for their households, and to improve food security. CRIs also contributed help respondents (93% in 2024) prepare food better, storage water (80% in 2024), and having better shelter (68% in 2024).

<sup>196</sup> UNHCR participatory assessments, post-distribution monitoring, other UNHCR documents and Humanitarian Needs and Response Plans.

<sup>197</sup> UNHCR HQ-RB EHAGL mission to Somalia, 13th - 16th December 2022.

<sup>198</sup> No specific CBI monitoring data were identified for IDPs.

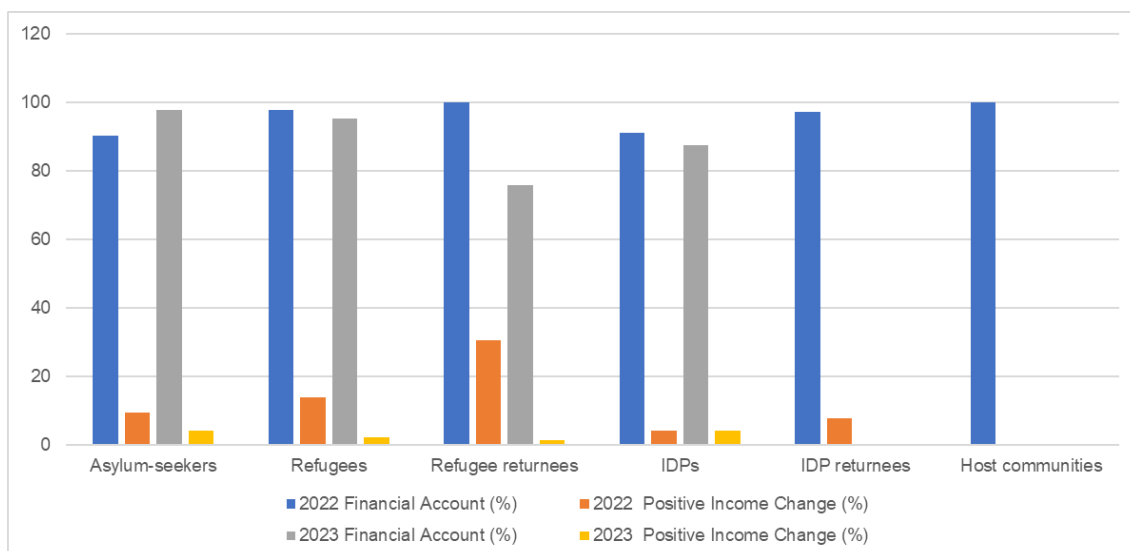
<sup>199</sup> According to the results of the CBI PDM survey, 98% of cash recipients were satisfied with the financial assistance they received.

<sup>200</sup> All 2023 PDM respondents (99%) reported satisfaction with the quality of the NFI items received, and positive impact in living condition (99% in 2023, 100% in 2024).

allow for the distribution of CBI in emergency situations. In addition, the OIOS 2024 audit found deficiencies in assessing the effectiveness of different distribution methods, the outdated risk matrix, limited partner-led distribution assessments, lack of baselines and difficulties in measuring progress, limited implementation of CashAssist and excessive use of over-the-counter cash withdrawals. Weaknesses in distribution controls and the effectiveness of CRIs were also identified by the auditors.

158. The RMS indicators show negative changes in the population with an account at a bank, or other financial institution, or with a mobile-money service provider and income levels between 2022 and 2023 (see figure 21 below). The decline observed between 2022 and 2023 suggests a reduction in access to, or retention of financial accounts for both genders, although men consistently maintained a higher proportion of account ownership than women. The figure also shows a decrease in the proportion of respondents reporting positive changes in income between 2022 and 2023 for both genders. The decline in positive income changes between years may indicate increased economic challenges or reduced opportunities for income growth in 2023 compared to the previous year, affecting both genders.

**FIGURE 21: RMS SELECTED INDICATORS – BASIC NEEDS (2022-2023)**



Source: UNHCR RMSs data sets made available to the evaluation

## Education

159. **UNHCR has contributed to the integration of refugee children into the national education system (albeit with extremely limited capacity) and that has helped reduce barriers to access through financial support.** However, enrolment and dropout rates in secondary education are critical and vary from state to state, particularly affecting girls, the Yemeni population and returnee children, and preventing access to tertiary education. While education legislation and policy in Somalia are generally supportive of children's right to education regardless of their origin or administrative status, government expenditure on education remains extremely low, and schools often require financial contributions from parents. In this context, UNHCR has played a key role in subsidising school fees (in kind or through CBI) for some 6,000 refugee children per year whose households are unable to meet the costs due to limited livelihood opportunities (in line with the Refugee Education 2030 Strategy). At the same time, UNHCR has invested in public school infrastructure, equipment and teaching capacity to strengthen and expand the system for additional learners, including

refugees.<sup>201</sup> Although UNHCR's financial support has been fundamental in facilitating schooling, it has created sustainability challenges, exacerbated by the lack of an exit strategy agreed with national institutions.<sup>202</sup> While there is capacity and some inclusion in the education system in Somaliland, the public education system in states such as Puntland and South Central remains limited, due to scarce public expenditure.<sup>203</sup>

160. In Somaliland, Yemeni children face specific barriers (language, rejection, differences in curriculum) and resort to pseudo-private schools that do not fit in with UNHCR's education strategy to strengthen and expand the public system for the benefit of all children, including host communities. UNHCR monitoring indicators and the RMSs show a decline in enrolment in the transition from primary to secondary education from 2022 to 2023, in a context of low enrolment. Low enrolment creates specific protection risks for both boys (child labour and exploitation) and girls (GBV, early marriage), and is a critical barrier to their local integration and development prospects.<sup>204</sup> In terms of tertiary education, the Albert Einstein German Academic Refugee Initiative (DAFI) scholarships have been instrumental in facilitating access to university for more than 200 students, a success story despite the very limited population coverage.<sup>205</sup>

## Health

161. **UNHCR has contributed to facilitating refugee access to the health system in Somaliland and appears to have achieved positive coverage for measles vaccination for asylum seekers and skilled birth attendance for asylum seekers and refugees.** However, access to health care for refugees in Puntland and Mogadishu is more limited, measles vaccination rates and skilled birth attendance for other population groups (IDPs, refugee returnees) are significantly lower.<sup>206</sup> The OIOS 2024 audit, questions the credibility of health indicator measurements reported by UNHCR. Furthermore, the continuity of health services for refugees is heavily dependent on UNHCR funding, putting at risk some gains made to date. UNHCR reports a high level of access to primary health services for all categories of the population, although in practice there are economic, geographical and socio-cultural barriers to access, which UNHCR has partially mitigated by funding service delivery and CBI support for specific cases. In 2023,<sup>207</sup> between 21,000 and 27,000 refugees and asylum-seekers were assisted in primary care annually, and more than 4,000 referred to specialised care. However, the positive data on full population coverage in primary care, measles vaccination and births attended by skilled health personnel are questioned in the 2024 OIOS audit, inter alia due to the poor quality of self-reported data, discrepancies between UNHCR data and other sources, and limitations of health needs assessments.<sup>208</sup> In 2023, UNHCR budget cuts led to the closure of two maternal and childcare facilities (Mogadishu, Hargeisa) and reduced capacity to provide medical care, purchase medicines and respond to health-related needs.<sup>209</sup> The closure of maternity wards is an example of the dependence on UNHCR funding (and other international funding) to provide essential services (not only health, but also education, shelter and other services) to the different groups of the population. In the current context of a serious humanitarian funding crisis and the growing emphasis on

<sup>201</sup> UNHCR Annual Results Report Somalia ABC (2022 and 2023); internal version.

<sup>202</sup> OIOS internal audit division, Report 2020/052. Audit of the operations in Somalia for the UNHCR.

<sup>203</sup> In Puntland, 84% of Sector funding came from development partners in 2020, with a further 7.5% coming from household contributions. In South Central, public expenditure on education remains low, with only 5% of the overall budget allocated to education in 2020. Domestic funding for education is scarce, and families and development partners mostly provide it (UNHCR HQ-RB EHAGL mission to Somalia, 13th – 16th December 2022).

<sup>204</sup> Analysis of Result Monitoring Survey as part of the Country Strategy Evaluation - UNHCR Somalia (desk review).

<sup>205</sup> The positive impact of the DAFI Scholarship Programme is in line with the findings of the Evaluation of the UNHCR Tertiary Education Scholarship Programme (DAFI) conducted in 2022.

<sup>206</sup> Analysis of Result Monitoring Survey as part of the Country Strategy Evaluation - UNHCR Somalia (Desk review).

<sup>207</sup> UNHCR Annual Results Report Somalia ABC (2023); internal version.

<sup>208</sup> OIOS internal audit division, Report 2024-01902. Audit of the operations in Somalia for the UNHCR.

<sup>209</sup> UNHCR Annual Results Report Somalia ABC (2022 and 2023); internal version.



sustainable responses<sup>210</sup>, expanding partnerships between UNHCR and development organizations—aimed at strengthening inclusive national systems—is becoming increasingly important.

## Livelihoods

162. **UNHCR has actively promoted vocational training, public and private sector recruitment, and legal advocacy—particularly in support of the Kampala Declaration, the National Durable Solutions Strategy (2020–2024) and the National Policy on Refugee-Returnees and IDPs. Despite progress in enhancing access to banking services and mobile money across all groups, and support for micro-enterprise development, the scale of livelihood interventions remains significantly below needs. UNHCR’s livelihoods efforts were constrained in scope by climate shocks, economic instability, inadequate financial infrastructure, and internal resource limitations.**

163. UNHCR regularly conducted vocational training activities, promoted recruitment of forcibly displaced and people at risk of statelessness in the private sector (companies, chambers of commerce) and various public administrations, and it advocated for the implementation of the Kampala Declaration on Employment, Livelihoods and Self-Reliance for Refugees, Returnees and Host Communities and improvements in the legal framework. UNHCR also supported the efforts of the FGS to expand durable solutions within the framework of the National Durable Solutions Strategy (2020 – 2024) and the National Policy on Refugee – returnees and IDPs. UNHCR supported livelihoods activities have sometimes been implemented in locations characterised by mixed urban displacement, where refugee returnees and IDPs live side by side and compete for livelihood opportunities.<sup>211</sup>

164. In terms of access to banking services (one of the main barriers to socio-economic inclusion affecting all population groups), available indicators show that UNHCR's interventions have contributed to high levels of access to bank accounts and strong mobile money penetration across all population groups.<sup>212</sup>

165. UNHCR also supported the creation of micro-enterprises (a priority option for access to livelihoods in a critical national economic and humanitarian context), but at a very low scale relative to needs. The proportion of people reporting positive changes in their income in 2023, compared to the previous year, is low (+1.2%).<sup>213</sup> In general, the unemployment rate is close to 100% for refugees, asylum seekers and returnees throughout the period under evaluation.<sup>214</sup>

166. The proportion of IDPs, refugees and asylum-seekers living below the national poverty line has remained at 69% during the past two years, in a context where almost 7 out of 10 Somalis live below the poverty line, particularly in rural areas and IDP settlements.<sup>215</sup> UNHCR's efforts to improve access to livelihoods have been severely constrained by contextual factors, for example drought, famine, inflation and overall economic situation, limited social networks. The situation for Yemeni refugees is particularly critical. their access to financial services is severely limited by the absence of financial records and identification documents. in addition, negative perceptions of livelihood programmes, a reliance on

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<sup>210</sup> UNHCR Sustainable Responses and the Global Compact on Refugees, January 2025.

<sup>211</sup> See section on urbanisation and forced displacement.

<sup>212</sup> In 2023 according to the RMS, the proportion of people with an account at a bank or other financial institution or with a mobile money service provider was 73.99% for internally displaced persons, 92.51% for refugees and asylum seekers and 80.39% for returnees.

<sup>213</sup> UNHCR RMS 2023; the indicator Proportion of PoC who self-report positive changes in their income compared to previous year, increased from 10.2% (2022) to 11.4% (2023).

<sup>214</sup> UNHCR RMS 2023.

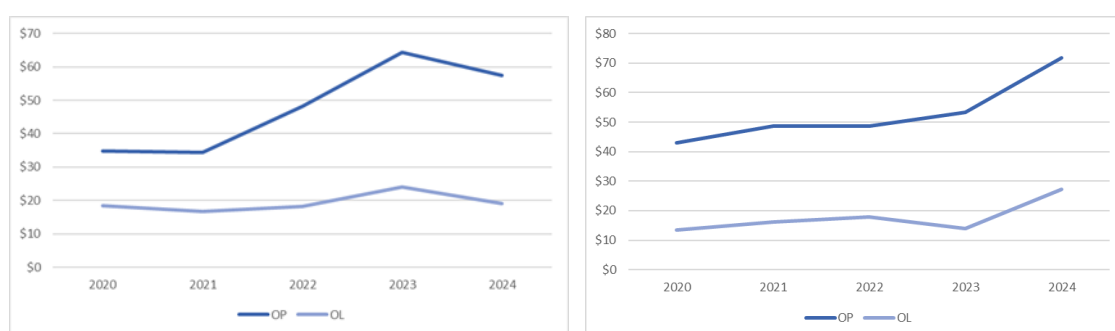
<sup>215</sup> World Bank poverty assessments (2019, 2024). More than half of the Somali population lives below the national poverty line (54%), with the highest poverty rate among the nomadic population (78%) and the lowest in urban areas (46%). However, given the high rate of urbanisation, poverty is concentrated in urban areas. Spatially, poverty is highest in the central and southern regions of Somalia. Poverty remained unchanged between 2017 and 2022 (in line with stagnating GDP per capita).

subsistence allowances, and restricted access to fertile land have created substantial barriers to improving their economic self-reliance.

## ADDRESSING THE REFUGEE OR IDP DILEMMA

167. At policy level, UNHCR emphasizes promotion of inclusion and solutions for IDPs, aiming to integrate them into national services and local economic development, while maintaining an operational response to prevent and mitigate the most urgent and immediate protection risks and needs.<sup>216</sup> However, implementation reveals a disconnect, with declining budgets for IDP responses despite increasing needs, while funding for the refugee assistance grows. Most impact area resources focus on protection and assist (83% of the budget), leaving limited capacity for self-reliance. Field evidence shows reliance on tri-cluster support for IDPs, as envisaged in the IDP Policy.<sup>217</sup> UNHCR's data show a growing contradiction between the worsening situation of IDPs in Somalia both in terms of an increase and intensity of needs, and UNHCR's declining IDP response budget. The increase in the humanitarian needs of IDPs has not been matched by consistent budget prioritisation and resource mobilisation.<sup>218</sup> Although part of UNHCR's IDP response is delivered through its role as cluster coordinator and provider of last resort, the organisation also has an operational role to ensure a community-based protection approach and to prioritise interventions to prevent, respond to and mitigate the most urgent and immediate protection risks and needs.<sup>219</sup> Budget allocations for IDP response have not kept pace with increasing needs. In a context of progressively declining funding for the operation, available funds (OL) for the IDP programme (Pillar 4) have remained relatively stable (around US\$19 million) from 2020 to 2024, while available funds (OL) for the refugee programme (Pillar 1) increased by 41% over the same period. In percentage terms, the weight of the IDP programme remained stable at around 36% of the total available funds (OL), while that of the refugee programme increased from 24% to 51% over the same period<sup>220</sup> (see figure 22 below).

**FIGURE 22: AVAILABLE FUNDS (OL) FOR, RESPECTIVELY, IDP AND FOR REFUGEE PROGRAMMES - 2020-2024**



Source: UNHCR Compass data OP OL 2022-2024 (updated with 2024 financial data in January 2025; information provided by EvO).<sup>221</sup>

<sup>216</sup> See policy on UNHCR's engagement in situations of internal displacement, chapter 6.2. Delivering a protection and solutions response.

<sup>217</sup> "The parameters of UNHCR's operational involvement in humanitarian crises characterized by internal displacement will normally be aligned with our leadership and coordination responsibilities related to protection, camp coordination and camp management and shelter, with a particular emphasis on displacement owing to conflict and violence, in line with IASC arrangements." Chapter 6 – Policy on UNHCR's Engagement in Situations of Internal Displacement.

<sup>218</sup> See section on UNHCR's budget structure in evaluation for more details.

<sup>219</sup> See policy on UNHCR's engagement in situations of internal displacement, chapter 6.2. Delivering a protection and solutions response.

<sup>220</sup> See section on fit-for-purpose for more details.

<sup>221</sup> See section on fit-for-purpose for more details.

168. **UNHCR has a limited role in the UNCT, when it comes to IDPs.** As noted in the UNSDCF evaluation and confirmed through multiple interviews—including with senior staff—inter-agency coordination has often been characterized by competition for resources. Additionally, interviewees reported that, until 2024, UNHCR had struggled to clearly articulate its role in the IDP response. In part, this was a factor of internal debate at country level on UNHCR's engagement but also related to competition and perceived overlap of mandates with other agencies, such as IOM, and competition for attention of donors. The evidence-base to inform analysis, advocacy, programme design, resource mobilization and communications is accessed primarily via the tri-cluster channels (see EQ 1.2). While relief assistance was provided, for example in Somaliland to the growing influx of IDPs from the Puntland conflict in 2024, this remains circumscribed while other agencies, such as IOM and WFP, took on the bulk of the response. Support to (sub)national resilience systems, for example through private sector employment opportunities, or a shift from emergency assistance to long term solutions through land ownership were heavily constrained by Somaliland policies and society, both of which discourage IDP settlement.

## SELF-RELIANCE FOR REFUGEES AND ENABLING ENVIRONMENT FOR SOLUTIONS

169. **UNHCR made continuous efforts to support an enabling environment for refugee self-reliance and solutions, but progress was hindered by inconsistent national policies, limited national capacity, and reliance on external resources.** In Somaliland, respondents indicated refugee acceptance improved, however, UNHCR has not seen this leading to sustainable institutional growth. National asylum systems remain underdeveloped and heavily dependent on UNHCR funding and support, with essential functions like RSD still managed by UNHCR outside Somaliland. Capacity-building initiatives have not yet established the foundational structures necessary for sustainability of the national asylum system and inclusive public policies, posing challenges in a declining funding environment.

170. UNHCR's support for an enabling environment for self-reliance and solutions for refugees has been met with a difficult economic environment and a severe lack of capacity of national actors. These remain underfunded through Somaliland official channels, which forces them to turn to UNHCR for the implementation of tasks (transport, equipment, etc...). Somaliland's counterparts, for example have shown an increasing acceptance of refugees, moving from hosting none in 2022 to 1931 NDRA registered individuals in 2023, and a target of 4,800 registered in 2024<sup>222</sup> (although this was reportedly not reached). This was, however, obtained by exercising direct local conditionalities for the financial support to the NDRA (which was a finding criticized in the OIOS audit report). In these circumstances, the Sub-Office personnel did not see micro-conditionalities as conducive for a better institutional and policy environment.

171. **Despite some capacity building activities, UNHCR has not been able to develop and consolidate the national asylum system in Somalia, which has been entirely dependent on UNHCR funding and support, and which has also faced limitations affecting the prospects for sustainability and handover to the Somali authorities.** During the period under review, the essential functions of the national asylum system have been taken over by UNHCR on behalf of the government (such as RSD, due to obvious deficiencies) which, in addition to operational problems, has led to a high level of government dependence on external resources (which is in line with the findings of UNHCR evaluation of asylum capacity development in 2022). UNHCR continually provided expertise and training to officials to develop skills and tools, and it contributed logistical and technical resources to the national commission. However, UNHCR support fell far short of developing the essential “building blocks” of a national asylum system, as envisaged in UNHCR's own asylum capacity

<sup>222</sup> UNHCR Annual Results Report 2023, Somalia ABC, Internal.

development guidance, because it substituted rather than incentivised state responsibility. The dependence of the national asylum system on international assistance is understandable in one of the world's most fragile and least developed states but poses significant challenges in a declining funding environment. The evaluation has no recent information on the discussions initiated by UNHCR in 2023 to transfer RSD to the FGS and the results of the asylum capacity assessment.

172. UNHCR/CCCM has also provided capacity-building support to the Somalia Disaster Management Agency and Federal State Commissions for IDPs and Refugees, empowering these government agencies to fulfil their primary responsibilities of protecting and assisting forcibly displaced communities. Furthermore, in several locations across Somalia, UNHCR/CCCM-led sub-clusters co-lead efforts alongside the Government, setting out to gradually transfer responsibility and fostering sustainable coordination mechanisms and governance. This transfer of responsibility was carried out to support a compact of protection and CCCM interventions concluded by UNHCR and the government.
173. UNHCR's operational portfolio implemented between 2019-2024 shows that it has the necessary scope to further integrate self-reliance within existing activities. For example, prioritising vulnerable households, or semi-permanent housing projects, as opposed to training for employment could have addressed both immediate shelter needs and longer-term resilience goals. Such an approach is more closely connected to beneficiary group strategies, as was demonstrated in the Baidoa and Kismayo case studies, where it supported lasting outcomes even with constrained resources.

## 4. CONCLUSIONS

**C1) The UNHCR operation in Somalia has diligently implemented the organisation's main policies (including the IDP policy), which required it to mobilise and deploy its capacities toward the longstanding pledge to work in partnership with others to strengthen protection and promote durable solutions for IDPs.** This was done despite acute insecurity and repeated crises in the country. The operation's role in UN coordination and through transformational partnerships with Government agencies is well recognised. An expenditure of US\$263.5 million during the period under evaluation has contributed to emergency responses by creating more humane conditions for refugees and IDPs with a needs-based approach, albeit on a limited scale determined by available resources. Similarly, the need to maintain emergency responses in the face of the intensity of recurrent humanitarian needs has made it difficult to pursue actions to strengthen the capacity of national systems and to define sustainability strategies.

**C2) The evaluation finds that further investment in Area Based Programming (ABP) would strengthen UNHCR's operations in three ways:** (a) it can enable the organisation to adopt a cross-cutting 'protection-first' approach to all forcibly displaced populations, based on their needs, and overcoming the urban/rural divide; (b) through the initial analysis in ABP work, it is possible to identify the environmental, social and protection elements of ecosystems that have a significant exposure to climate change and, hence, need strengthening, and as such it potentially offers a climate-relevant approach to building resilience; and (c) it can facilitate a form of localisation and a stronger link to affected populations, based on UNHCR's field presence. Here fundraising can be based on stronger indicators of need and tangible population profiles, for example by creating a link to trade corridors (which some donors are now emphasising) or a Route-Based Approach. Area-based approaches come with a potential to enhance the flow of information from hard-to-reach areas, ensuring timelier (pre-displacement) and contextually appropriate (including climate factors) interventions. It works best, as reflected in the evaluation workshops where the transaction cost of such coordination was criticised, because it was not purely focused on coordination mechanisms, but instead on populations and their specific environment. UNHCR's decentralised approach to partnerships at the FMS level has created linkages with national authorities, particularly the NCRI, which advocates for a unified framework, and which provides a good foundation for Government-owned area-based work.

**C3) However, the UNHCR operation in Somalia has found it difficult to fully capitalise on its positioning and strengths due to the paralysing effects of pursuing too many outputs while not being able to formulate a clear strategy for resource allocation. Despite the difficulties involved in measuring outcomes, there appears to be an imbalance between the mobilisation of resources and the scale of results achieved.** The MYSP has remained an aspirational document, which opened many doors but closed none. Monitoring of results and reporting of the MYSP have not been consistent and do not make a consistent analysis of effectiveness possible. The budget allocation for different outcomes is not well aligned with strategy and planned objectives. In addition, the increasing concentration of staff on Mogadishu and on refugee protection has had a detrimental effect on the operational capacity and effectiveness of other field presences (one of UNHCR's strengths) and the other three impact areas (assist, empower, solve). In terms of coordination, the uncontrolled growth of UN coordination mechanisms and workloads has not offered a humanitarian counterbalance to some of the systemic issues that IDPs face, such as spatial over-concentration of assistance, the enclosing influence of security guidelines, and the inability to make contact with partners writ large.

**C4) UNHCR's overall performance in Somalia illustrates the difficulty of balancing a large-scale response in one of the world's most fragile and crisis-prone countries with efforts to reduce aid dependency and build the capacity of national systems to protect and respond**

**to critical needs, promote inclusion, self-reliance and empowerment, and move towards solutions.** UNHCR's efforts to align with national and global frameworks and promote a favourable protection environment through updated legal frameworks whilst maintaining and navigating positive, albeit complex relationships with government institutions at different administrative levels have been essential foundations for moving towards solutions. The adoption of Somalia's Refugee Act and efforts toward localisation are significant milestones. In a large-scale humanitarian context, UNHCR was able to provide a rapid response to humanitarian needs arising from recurrent emergencies (for example violence and forced displacement, outbreaks, drought), in particular by channelling resources for shelter, CBI, and NFI for different populations in accessible locations. In the area of GBV, UNHCR's protection efforts show little progress beyond direct assistance and case referrals, despite being one of the operation's largest budget allocations and a key theme of the Protection cluster coordinated by UNHCR. In addition, limited progress in leveraging partner support for livelihoods and in interventions that promote self-reliance, lack of a robust national asylum system, and contextual challenges hindered UNHCR in significantly contributing to impact as envisioned in the MYSP.

**C5) Despite its leadership in the protection, CCCM, and shelter clusters, UNHCR finds inter-agency coordination and internal coherence laborious, requiring a high level of commitment from limited resources.** Coordination is time consuming in the three clusters, which are UNHCR's principal means of interaction with the interagency humanitarian coordination system. The Triple Nexus approach remained underutilized due to siloed donor funding, fragmented partnerships, and a continued reliance on project-based financing. These structural limitations hindered the practical realization of humanitarian–development–peace linkages and constrained opportunities to foster strategic synergies with development actors. UNHCR has provided significant support to the provision of shelter, but there has been limited complementarity and synergy between project components (for example shelter, livelihoods, protection), which is essential to promote durable solutions (see EQ4).

**C6) The UNHCR operation in Somalia has contributed to addressing displacement in urban centres but has not been able to mitigate urbanisation challenges by extending outreach into remote areas and contributing to livelihood.** Here, the UNCT security frameworks but also federal legislation has constrained rural access. The operation has made strides in addressing displacement in urban centres but has inadvertently contributed to urbanisation challenges by focusing on easily accessible areas. Rural areas, often dominated by conflict or climate challenges, with a high concentration of IDPs, remain underserved. This unintended outcome is an imbalance that strains urban infrastructure and leaves rural communities vulnerable, highlighting the need for a more nuanced geographic distribution of resources and interventions. Despite an overarching strategic commitment to sustainability, UNHCR's programming remains heavily focused on protection and basic needs which tend to focus on more accessible groups, with limited progress made in advancing self-reliance, leveraging livelihood development<sup>223</sup>, or resilience building for IDPs and refugees. Budgetary constraints and societal resistance to refugee and IDP inclusion further hinder long-term outcomes. Addressing these

<sup>223</sup> The MYSP mentions livelihood 37 times, including the following two statements: "The Government of Somalia announced four pledges focusing on burden and responsibility sharing, livelihoods, and solutions in the Global Refugee Forum (GRF) in 2019." And: "The strategic shift towards an emphasis on durable solutions will build on the work that has already been done in the operation with an aim towards specific changes in the lives of the persons of concern in the next years through delivery of protection, basic services, livelihoods, and economic inclusion solutions". Outcome 1 and OA13 mention specifically livelihoods, access to land and productive assets and; access to diversified job opportunities and income sources. It states that "The operation will continue to provide support to technical and business skills development; through the provision of vocational training, especially for youth and women, to increase their access to labour market. In this area, the operation will strengthen partnership with Vocational training centre, with specialized agencies like GIZ, ILO and the Ministry of Labour and Social Affairs. In addition, will collaborate with development actors, private sector and financial institutions to improve access to business capital, access to information and technology, access to financial services and access to job placement services, to increase the access of People of Concern to job opportunities and facilitate income diversification. The operation will facilitate linkage to private sector to strengthen the access to jobs opportunities in dignified workplaces. In addition, the operation will advocate for the improved legal and regulatory environment."



barriers requires prioritizing economic inclusion, land access, CBI, and vocational training initiatives, through partnerships with development actors and the private sector.

**C7) UNHCR's streamlining of partnerships<sup>224</sup> have been challenging and are gradually addressed at an organisational level. They also coincide with a sudden decrease in funding for partners.** At the same time they offer a chance for new Triple Nexus synergies, and could be linked to an emerging climate-focused and local Government-strengthening approach. While localisation efforts show potential to increase relevance and inclusivity, particularly on behalf of IDPs, the reduction in local partner engagement has weakened grassroots engagement. Local NGOs face barriers in accessing partnerships, leading to a reliance on larger NGOs. Building local coalitions remains limited, with inconsistent progress in transitioning responsibilities to national authorities.

**C8) UNHCR investment in monitoring and reporting on results in Somalia is extensive, but it does not provide systematic information about envisaged changes, is not reliable for decision-making, and poses a risk to the credibility of the operation. Furthermore, the logic and criteria that explain the transition from the OP to the OL, and the fluctuations in the OL throughout the year (which partly reflect prioritisation), are not documented. This hinders the analysis of the link and coherence between strategy, resources and outcomes.<sup>225</sup>** Despite UNHCR's considerable financial investment in third-party monitoring and protection monitoring, the results have not been useful in measuring progress. The reported achievement of targets in 2022 and 2023 is not corroborated by observations from the field or other sources. The various documents consulted, indicate a difficulty in planning (particularly in the definition of baselines and targets) and monitoring results. In line with the results of previous CSEs, UNHCR's corporate model for planning, budgeting and reporting presents challenges when it comes to consistently analysing strategy implementation.

**C9) In addition, an impossibly wide number of outputs have been combined with a promotion of partnerships with small and dispersed contract sizes have had an impact on UNHCR's ability to deliver results - a fact which has been recognised in 2024 and is being addressed.** The target driven approach that is adopted once a contract has been signed leads to a focus on numbers, rather than on quality. OIOS audits have repeatedly identified the high costs of some PPAs, particularly those relating to monitoring and assessments, as a critical risk, although the UNHCR has committed to introducing changes by 2025. The organisation is entering into the next MYSP phase with an opportunity to simplify planning. At the same time, the sudden halving in donor funding, which occurred in the beginning of 2025, impels in-depth reflection on the core fundraising proposition. These combine to create the clear need for a new organizational posture.

**C10) UNHCR's staffing strategy and field presence reflect adaptability to shifting demands, and priority given to optimizing costs.** Notably, the organisation has increased the proportion of national Somali staff while reducing international personnel, addressing financial constraints and enhancing localized responses. Furthermore, its decentralized field presence has enabled broad coverage and alignment with protection and displacement response mandates. Despite these efforts, the operation faces persistent difficulties, including gaps in technical expertise, strained operational capacities, and challenges in accessing remote and insecure areas.

**C11). UNHCR's management processes—including Project Partnership Agreements, partner oversight, coordination and human resources procedures—are characterized by administrative complexity that appears misaligned with the dynamic and often**

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<sup>224</sup> Following the recent partner selection process, six partners have been selected for partnership with UNHCR, four of which are national partners. Additionally, the operation plans to engage with community-based organizations led by IDPs or refugees to further strengthen localisation efforts.

<sup>225</sup> This is not a specific issue for the operation in Somalia, but rather an organisational issue that has been frequently documented in previous CSEs. It is the result of UNHCR's planning model and internal procedures.

unpredictable nature of its operational environment. As a result, substantial staff time and organizational resources are directed toward managing bureaucratic requirements and reactive responses, rather than fostering proactive engagement with partners. This imbalance hinders the development of operational synergies and strategies aimed at addressing recurring challenges and enhancing performance through a focus on means, ends, and quality. Operational inefficiencies, such as unclear lines of responsibility, frequent restructuring, and gaps in monitoring and data management, further hinder adaptation. While efforts to enhance partnerships with national and international entities, including development actors, have yielded localised successes, these initiatives have not yet reached the scale and depth needed for transformative impact. Persistent accountability challenges among implementing partners, as noted in repeated OIOS audits findings, exacerbated operational inefficiencies into 2024. While UNHCR's organizational strategy and localized staffing efforts align with its vision, barriers in resource mobilization, coordination, and operational flexibility, limit its capacity to meet its overall impact areas.

## 5. RECOMMENDATIONS

These recommendations have been drafted bearing in mind that since January 2025, UNHCR has been facing a period of financial uncertainty, owing primarily to the freeze on all foreign aid decided by the United States – historically, its biggest donor.

The recommendations below reflect that selected areas of work should now receive lower priority than accorded in the past. They take into consideration, not only the evidence collected and analysed up to December 2024 but also UNHCR instructions for a tiered programmatic prioritisation released to support operational planning and implementation under the constrained funding environments introduced in 2025.

A significant degree of uncertainty must be taken into account in terms of UNHCR's own policymaking in relation to this change.

**Analytical Premise:** Who to engage with and how to engage with them is the central question for the formulation of the new MYSP. It will define the type of system-wide role that UNHCR can play in Somalia. Enhancing programmatic relevance can be done through spatially defined planning and engagement without altering planned objectives, and whilst also supporting creation of a joint focus across outcomes.

**Recommendation 1 (for CO):** Strengthen Institutional Partnerships and Localisation  
UNHCR should narrow and deepen the focus of the operation, enhancing national capacity by creating a unified area-based operational framework with the authorities.

Suggested actions:

- **UNHCR CO and NCRI:** Seek to harmonise national asylum and IDP protection policies at the local level with consistent by-laws to maintain the humanitarian response under the UN country leadership, based on a sound protection and context analysis.
- **UNHCR CO:** Expand partnerships with local organisations through the six remaining partners, ensuring sufficient funding to build long-term capacity at the local level. This could be done by tasking partners to focus on local NGO access to funding and enhancing protection risk management and community-based accountability.

**Recommendation 2 (for the CO):** Strengthen the local level of agreements on ABP. UNHCR should develop decentralised geographically defined agreements on ABP with sub-national governments while continuing its dialogue with federal-level partnerships on the same.

Suggested actions:

- **UNHCR CO and field presences:** Develop ABP (as opposed to Area Based Coordination) as a way to scale up and unify of field-level interventions while aligning with national frameworks. Use ABP to negotiate the acceptability of asylum with local authorities and to ensure that hard-to-reach populations are given the right priority for access to basic services central for building resilience, humanitarian assistance and care.
- **UNHCR CO:** Update the framework for institutional relations with relevant government institutions and the mechanisms for working with civil servants, which have, so far, called heavily on financial contributions from UNHCR, to promote a new basis for programming using joint analysis, shared responsibility and broader alliances with other agencies and development actors.

**Recommendation 3 (for the CO):** Adopt a more transformative approach to partnership. In line with the guidance on Sustainable Responses and the Global Compact on Refugees, UNHCR should pivot towards the convening and catalytic role that it now needs to play more systematically in achieving results.

#### Suggested Actions:

- **UNHCR CO:** Reduce the importance of the transactional nature of partnerships. The evaluation finds that a contracting and targets-based approach to partnerships creates unnecessary rigidities, in particular in taking on UNHCR's Triple Nexus, local capacity development and climate change commitments. The partnership approach should shift towards closer dialogue and knowledge management with the smaller number of partnerships established, with a priority given to local risk management and contextual understanding.
- **UNHCR CO:** Embrace in a structured manner the engagement with the development banks, including by adjusting standard practices in terms of due diligence, impact assessment (although not formally a current practice, the analysis is currently subsumed under safeguards and sensitivity guidance). This may imply adjustments in grant management and programming, and new reporting content, but should be linked to an increasingly catalytic role to be played by UNHCR. The CO should build on field presence and an uncontested role in protection to position itself centrally in relation to these actors as well as unconventional donors.

**Analytical Premise: UNHCR has scope to maintain a focus on life-saving support and protection promoting solutions through support to policy and legal work and by strengthening nexus working and use of ABP:** UNHCR is able to promote self-reliance by leveraging investments from international financial institutions (IFIs) and by strengthening nexus-oriented approaches as bridging mechanisms that do not require direct implementation or additional resource inputs from UNHCR. Simultaneously, the organization should continue to support the development of a legal and policy framework that facilitates integration and inclusion. Within this strategic direction, opportunities emerge in programmatic areas such as micro-financing through cash-based interventions (CBIs) or specialized partners, land tenure protection, and support to local actors with significant implementation capacity. These approaches can be pursued without organizational adjustments (staffing and presence in Somalia) and align with a population-centric focus in the MYSP, which seeks to connect localised opportunities with the realistic scope of UNHCR's access to resources.

**Recommendation 4 (for CO and field presences):** UNHCR should focus on a delivery agenda including asylum capacity development, urgent protection needs and long-term inter-agency support on protection for both IDPs and refugees.

#### Suggested actions:

- **UNHCR CO:** Continue to advocate for the adoption of a uniform legal framework for international protection, as well as for the maintenance of the essential functions of the national asylum system among different government entities, despite multiple factors beyond the control of UNHCR<sup>226</sup> and within the limits of available resources.
- **UNHCR CO with IPs:** Increase support to protection interventions for targeted urgent high-risk cases, including protection monitoring, vulnerability screening and referrals, primary health care for refugees and asylum-seekers and individual protection assistance for individuals exposed to higher protection risks.
- **UNHCR CO with IPs:** Support life-saving cash-based transfers for vulnerable IDPs and refugee populations. Advocate and continue to provide technical support for registration and profiling of newly arrived refugees and asylum-seekers.

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<sup>226</sup> See the results of the UNHCR asylum capacity development evaluation (2022): "achieving sustainability in national asylum capacity may depend on factors over which UNHCR has little or no control, or which lie outside the mandate and competence of the organisation."

- **UNHCR RB and CO:** Intensify efforts to identify and pursue synergies and operational efficiencies with other United Nations agencies, international financial institutions, and specialised organisations. These partnerships should aim to reinforce national systems—particularly in sectors such as education and health—while complementing UNHCR’s mandate to promote inclusive policies and access to essential services for forcibly displaced populations.
- **UNHCR HQ, RB and CO:** Explore the contextual adaptation of the UNICEF–UNHCR Blueprint for Joint Action to support the strengthening of Somalia’s national education system. This approach should focus on enhancing institutional capacity and fostering the inclusion of forcibly displaced populations in the national education system. Prioritising the education sector aligns with UNHCR global guidance on sustainable responses, which recognises education as a foundational element in building self-reliance. UNHCR and UNICEF could build on their experience of implementing the Blueprint for Joint Action in Ethiopia.
- **UNHCR CO:** Strengthen referral networks between agencies and organisations specialising in GBV in order to improve risk identification and case management, while also promoting the role of local and community actors.

**Recommendation 5 (for CO and field presences):** UNHCR should counteract urbanization pressures by enhancing rural service delivery to reduce displacement pull factors in accessible areas.

Suggested actions:

- **UNHCR field presences:** Maintain adequate staffing levels and profiles of Sub-Offices (even at the expense of the Mogadishu Country Office). Increase rural programming through local partners by positioning the organization in a pivotal role by emphasising Area Based Programming and enhancing non-transactional partnerships.
- **UNHCR CO:** Highlight the need for more adaptive strategies for UNDSS guidance for low profile operations to remote areas.

**Analytical Premise:** Enhancing Monitoring, Coordination, and Data Systems. Reducing the number of outputs to be achieved in the next MYSP (or alternatively the envisaged extension of the current MYSP) will aid a realistic fit to staffing of the CO. This should be accompanied by a reshaping of the monitoring system, with greater emphasis on the tracking of change beyond output level (i.e. tracing effects on population groups), including an enhanced focus on quality of deliverables and use of lighter and more visual forms of reporting.

**Recommendation 6 (for HQ, Regional Bureau, CO):** UNHCR should strengthen monitoring frameworks for data consistency and accountability.

Suggested actions:

- **UNHCR Regional Bureau and CO:** Implement unified tools for real-time data collection and improved partner reporting, especially in emergency settings. Use of Area Based Programming as a way to strengthen the materiality and verifiability of evidence by enabling reporting on population outcomes and reducing the importance of outputs.
- **UNHCR CO:** Improve the quality of third-party monitoring and protection monitoring mechanisms.
- **UNHCR Regional Bureau and CO:** The CO should identify gaps in the digital systems it uses (which do not enable links between spatial mapping, or stakeholder mapping, for example) with a view to enable a user-friendly presentation of quantitative and qualitative data – such as geospatial maps, context maps, process monitoring reports and analysis of perceptions on protection risks, in ways that facilitate the analysis of multi-annual

outcome trends and the experiences of populations for decision-making at the CO level. The country office should review the frequency of periodic reporting from Sub-Offices to ensure that it is optimal and use management meetings to highlight specific issues coming up at the sub-office level.

**Recommendation 7 (for CO): UNHCR should** establish a clear protection and area-based identification of hazards and capacities of local NGOs and local Government to operationalize the Humanitarian-Development-Peace Nexus.

Suggested actions:

- **UNHCR CO:** Use the Area Based Programming approach to promote collaboration across agencies to integrate social cohesion, long-term resilience and protection into programming, and expand the application of norms for the protection of IDPs.
- **UNHCR CO:** Implementing partners play a key role in information gathering owing to the time they spend in the field, and the relationships they develop with communities. Greater use should be made of that information. Adopt measures to obtain access to the knowledge that partners draw from their own community information systems by establishing a simple communication process.

**Analytical Premise: Building Operational Resilience.** Human resources will be a key theme in 2025 and after. Renewed attention to this aspect should help new staff better understand the operation and assimilate to institutional memory. Such measures would also help strengthen UNHCR's convening power in a context like Somalia where lack of staffing continuity negatively affects organizations.

**Recommendation 8 (for HQ, Regional Bureau, CO):** UNHCR should align staffing strategies with operational needs. UNHCR should emphasise onboarding, targeted recruitment, and strategic succession planning, and it should consider extending the current standard assignment length beyond two years.

Suggested actions:

- **UNHCR HQ, Regional Bureau and CO:** Address high staff turnover with robust onboarding, targeted recruitment, and strategic succession planning.
- **UNHCR CO:** Ensure as much continuity of international staff presence as possible dealing with specific displaced populations, providing them with clarity of priorities and long-term planning. In that frame, promote cross-disciplinary learning to serve these emerging priorities to better oversee multiple functions and outcomes at once.
- **UNHCR CO:** Embed technical expertise in critical areas, such as climate resilience and life-saving activities.

**Recommendation 9 (for HQ, Regional Bureau, CO):** UNHCR should optimise its field presence and financial sustainability.

Suggested actions:

- **UNHCR CO:** Consolidate resources to further prioritize geographic and thematic focus areas, ensuring alignment with strategic objectives.
- **UNHCR Regional Bureau and CO:** Align staff responsibility to the smaller number of outputs and outcomes to be achieved in the next MYSP to fit the realistic structure and staffing of the CO.

**Analytical Premise: Addressing management challenges:** Both the various OIOS audit reports and the evaluation findings have identified weaknesses in specific



management areas of the operation that affect organisational and programme performance and require special attention.

**Recommendation 10 (for Regional Bureau, and CO):** UNHCR should draw up a plan to improve the overall management of the operation, programme performance and to accelerate the implementation of the OIOS auditors' recommendations.

Suggested actions:

- **UNHCR CO:** Update the risk register of the operation, with a focus on finances, programmes and partnerships, as a basis for reinforcing risk prevention and mitigation actions.
- **UNHCR CO:** Implement comprehensive cost control mechanisms, integrating a cost-effectiveness perspective, in the decision-making and monitoring of programmes, both those implemented directly and those implemented through partners.
- **UNHCR Regional Bureau and CO:** Strengthen oversight of the performance of implementing partners and the quality of reported results.

## 6. APPENDICES

Appendix 1 – Terms of reference

Appendix 2 – Evaluation matrix

Appendix 3 – Data collection tools

Appendix 4 – List of persons met

Appendix 5 – Reconstructed theory of change

Appendix 6 – Analysis of distribution and PDM reports

Appendix 7 – Analysis of participatory assessments and UNHCR annual reports

Appendix 8 – Bibliography

Appendix 9 – UNHCR SOMALIA - relevant budget, staff & partners data