

UNHCR Evaluation Management Response			
Evaluation title:	<i>Independent Evaluation of UNHCR's Level 3 Response in Ukraine</i>		
UNHCR evaluation reference:	<i>EvO/2024/11</i>		
Entity that commissioned the evaluation:	<i>Evaluation Office, Geneva</i>		
Due date of Management Response:	<i>April 3, 2025</i>		
Coordinator of Management Response:	George Woode		
Management Response approved by (senior manager in commissioning office):	Name: Raouf Mazou	Job title: Assistant High Commissioner for Operations	Country/Office: Geneva, Headquarters
Date:	<i>Updated on 19/01/2026</i>		

General comments on the evaluation:	<i>UNHCR Representation in Ukraine agrees with all the 6 recommendations within its purview.</i>
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RECOMMENDATION 1:	<p>As part of the implementation of its 2025–2027 Multi Year Strategic Plan, UNHCR Ukraine should more clearly define the scope of its support to key strategic operational areas, namely Area-Based Protection, Collective sites and Community-Based Approaches.</p> <p><u>Area-based approaches:</u> While UNHCR retains a strong commitment to implementing ABAs, as part of its MYSP it should leverage its catalytic role to focus on promoting the conditions that would ultimately allow UNHCR to reduce its level of engagement. To achieve this, it should define a set of conditions (including triggers) under which it would responsibly handover these duties and/or phase out.</p> <p><u>Collective sites:</u> UNHCR should seek to implement a sustainable approach from the outset and outline a set of conditions for responsibly phasing out its existing operational support for CS. This should include facilitating residents' wider social and economic inclusion in hosting communities as well as active resident engagement for care and maintenance of those sites that remain. This would be best achieved as part of a broader cluster-led transition.</p> <p><u>Community -based protection:</u> The recent shift in strategic direction will be reflected in an updated protection strategy for UNHCR Ukraine. UNHCR's overarching protection strategy should incorporate a community-based protection strategy that brings together the different elements of UNHCR's approach (working with CBOs and outreach facilitators, IDP Councils and AAP staff), as a means of ensuring coherence across the agency's humanitarian response and solutions work in Ukraine.</p> <p>It is anticipated that <u>Community-Based Organizations</u> will play a key role in the delivery of UNHCR's community-based protection programme which underlines the importance of ensuring adequate support is provided to them. In parallel, UNHCR should ensure that</p>
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	expectations are managed in terms of what they can achieve and the scale at which they can achieve it. UNHCR should further establish clear benchmarks to more consistently monitor and support CBO graduation objectives.				
Management response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):	<i>[add only if partially agree or disagree was selected]</i>				
Unit or function responsible:	Ukraine CO Representative with support from the Deputy Representative, Assistant Representative (Protection) & relevant sectoral staff and cluster leads				
Top-line planned actions	By whom	Comments	Expected completion date	Progress	
				Status	Comments
1	Senior Durable Solutions Officer	<p>In response to evaluation recommendations along with insights into the broader internal and external review and lessons learned processes, strategic shifts were made within ABA programming in Ukraine. The Community Planning for Durable Solutions and Recovery (CPDSR) Working Group prepared a lesson learned based on 12 pilots that was shared with the UNCT, which recommended phasing out from coordinating the pilots and instead transitioning to a more Government and locally led and owned process of recovery programming.</p> <p>Subsequently, the UNHCR Ukraine 2025–2027 Multi-Year Strategic Plan shifted the focus from the previously UN -pursued ABA coordination, towards a local authorities-led coordination, building on the successes of local collaboration and data-sharing pilots. Simultaneously, UNHCR contributed to the RC/HC and UNCT-led strategy to transition into and support the efforts of the government-led approach, strengthening government ownership, aligning Sectoral Working Groups, while enhancing cross-sector cooperation, with a focus on strategic partnerships.</p> <p>Within the context of the 2025-2029 UNSDCF and RC/HC-led discussions with the UNCT on the linkages between recovery, durable solutions and development, the RC/HC has (re-) established a small steering committee with IOM, UNDP and UNHCR to advise the UNCT and Results Groups under the UNSDCF on durable solutions enablers and barriers, and</p>	Completed - Dec 2024	Completed	<p>UNHCR actively participates in various Sectoral Working Groups (SWGs) addressing housing, economic recovery, decentralization, regional development, and social protection. Led by the relevant ministries and co-chaired by development partners, these platforms are critical for shaping inclusive recovery policies. Within these platforms, UNHCR ensures that the needs of displaced and returnee populations are properly considered and that their rights and needs are prioritized in sectoral planning and decision-making. Through these engagements, UNHCR</p>

	<i>new responsibilities for IDP protection and solutions.</i>		<p>opportunities to promote enhanced coordination between UN agencies and the government, to help avoid fragmentation and ensure that durable solutions for IDPs are integrated into national priorities, and sustainable in the long term.</p> <p>In a future context of ceasefire and increased capacity of the government to focus its resources on recovery and support to IDPs' pursuit of durable solutions, UNHCR's role will evolve to mainly focus on technical advice and advocacy for systemic changes that remove barriers to IDPs' and returnees' durable solutions. Therefore, going forward, UNHCR Ukraine is leveraging its catalytic role within the 2025–2027 Multi-Year Strategic Plan (MYSP) to establish clear conditions under which it will responsibly phase out from direct involvement, as local capacities and government ownership increase. This approach ensures that the transition is gradual, responsible, and aligned with the goal of long-term sustainability.</p>			<p>also promotes coordinated, government-led responses by contributing to the mapping of interventions by UN agencies and recovery actors, reinforcing a collective commitment to durable solutions under the leadership of the Government.</p>
2	<i>Promote the development of a government strategy on durable solutions for IDPs in collective sites and streamline UNHCR's engagement in CS in line with a government and CCCM Cluster strategy and its transition</i>	<i>Assistant Community - Based Protection Officer.</i>	<p>The 2025 Protection Strategy caters to this recommendation by introducing an initial step of exploring alternative accommodation options to try, where feasible, to prevent the resort to collective sites, which should remain a last resort. This is implemented typically for IDPs arriving at transit centres where accommodation options are explored. However, given the limited alternatives, the protection strategy then applies a nuanced approach on UNHCR's engagement in collective sites, that better enables disengagement. It has three components: (1) a two-tiered approach to collective sites is applied; (2) enhanced Government engagement and advocacy for site transformation; (3) individual support.</p> <p>The two-tiered approach differentiates UNHCR's operational engagement in collective sites. In sites affected by emergencies, accommodation of new arrivals as well as care and maintenance efforts continue, albeit at a reduced scale as compared to previous years. In longer term sites, the operational focus is on softer components related to community organization and state capacity aimed at greater social connection and integration of sites inhabitants in the hromada (territorial community) and the services offered at the hromada-level instead of the site-level. This tiering of the approach already as of 2025 enables a gradual and responsible disengagement from the care and maintenance approach in collective sites.</p>	<i>December 2025</i>	<i>Completed</i>	<p>The development of a new state strategy on internal displacement has started. This will include IDPs in CS. UNHCR's advocacy and expert support contributed to the development of both this new draft national strategy and the new state resolution on state subventions for temporary accommodation for IDPs, including those living in collective sites. 1bls UAH (24M USD) has been made available by the state to hromadas. UNHCR consequently mainstreamed and focused its result framework for 2026 for CS related activities, encompassing shelter</p>

			<p>Moving forward increased Government engagement and advocacy is essential on transforming collective sites into forms of social accommodation and services. This approach focused on the transformation of sites, will need to be combined with individual support for durable solutions, considering the profile of the site inhabitants. Currently, UNHCR is working with the Ministry of Social Policy, Family and Unity (MoSP) on the methodology for this case management approach to durable solutions for such profiles, with the aim to roll it out more widely in 2026. UNHCR will promote with the Government the inclusion of this durable solutions-oriented approach in the new IDP strategy (as of 2026) or other suitable regulatory frameworks, to ensure Government ownership and leadership of this approach.</p>			<p>and protection outputs. This allows for more durable solutions-oriented planning in 2026.</p> <p>A social adaptation pilot with MoSP, which is a case management approach to durable solutions for vulnerable IDPs, is under way with good success and will be expanded to IDPs in CS from 2026, based on the methodology currently under development. UNHCR also initiated the Durable Solutions Initiative which encompasses a component on solutions for IDPs in CS. The initiative is led by the RC and supported by UNHCR, IOM and UNDP.</p>
3	<p><i>Leveraging the role and capacities of CBOs, IDP Councils, Community Volunteers (facilitators) for a more systematic engagement</i></p>	<p><i>Assistant Community - Based Protection Officer</i></p>	<p>The 2025 Protection Strategy caters to this recommendation. Its implementation in 2025 foresaw in particular a (1) CBO capacity assessment and (2) social impact assessment of the CBOs and IDP councils to determine their capacity to transform into community-based protection (CBP) systems and ensuing capacity development support.</p>	<p><i>December 2025</i></p>	<p><i>Ongoing</i></p>	<p>Both assessments are underway and are expected to be concluded by February 2026.</p>
<p>RECOMMENDATION 2:</p>		<p>Internally and across the clusters under its leadership, UNHCR should ensure that the use of Cash Based Interventions is the default modality and that the use of in-kind is clearly justified (e.g., demonstrated lack of market functionality). At a minimum UNHCR should rebalance the resources it dedicates to the distribution of Non-Food Items, in favour of greater allocation to its Cash-Based interventions.</p>				
<p>Management response:</p>		<p> <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree </p>				

Reasons (if partially agree or disagree):		<i>[add only if partially agree or disagree was selected]</i>				
Unit or function responsible:		Ukraine CO Representative with support from the CBI team and cluster leads				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	<i>UNHCR adopts a cash-first approach and recommends use of Cash based intervention as the preferred modality of support across the sectors.</i>	Senior Shelter Cluster Coordination Officer / Senior CBI Officer	<p>UNHCR Ukraine prioritize the use of cash in response to multisectoral needs of affected populations where market conditions and the profiles of the people in need allows. In kind distributions are restricted to locations where the population has limited access to markets, the banking infrastructure is no longer operational as well as for people in need with specific vulnerabilities.</p> <p>In 2024, UNHCR Ukraine initiated a pilot CBI programme to provide multi-purpose cash assistance after aerial attacks in lieu of distributing NFIs. In close collaboration with local authorities in affected locations, affected households had a choice to receive an NFI kit or cash assistance in line with the Cash Working Group's guidance for rapid multi-purpose cash assistance (MPCA). Beneficiaries received cash assistance of 10,800 UAH per person within 3 working days after being enrolled by UNHCR. According to the post-distribution monitoring conducted, 97% of beneficiaries were satisfied with the programme, stating that the assistance was relevant and timely. As a result, UNHCR has mainstreamed the approach as part of its overall response in 2025.</p> <p>In 2024, UNHCR also committed a technical CBI staff member to devote 50% of his time to increase the Shelter/NFI cluster's technical CBI capacity. As a direct outcome, the SNFI cluster harmonized the calculation methodology and transfer amounts winter energy needs, making cash the principal assistance modality during the 2024/25 winter season.</p> <p>The updated Shelter cluster Ukraine HNRP 2024 activities Handbook and Ukraine Shelter cluster winterization recommendation 2024-2025 further prioritise the use of cash as the preferred modality for assistance.</p> <p>ENG SC 2024 Activities Handbook v1 3.pdf</p>	February 2025	Completed	The pilot CBI Programme was initiated in January 2024, with all the learnings mainstreamed in the internal Standard Operating Procedures (SOP) effective February 2025.

			ENG Winterization Recommendations 24-25 v 1_5.pdf			
2	Conduct Joint Market Monitoring Assessment (monthly) and post distribution monitoring (PDM)	Senior Programme CBI Officer	<p>The Ukraine Cash Working Group (CWG) in collaboration with REACH set up the interagency Joint Market Monitoring Initiative (JMMI) as a principal source of information on market functionality. The results from the most recent (December 2024) JMMI indicates that markets are fully functional in the vast majority of Ukrainian-controlled territory. However, the elderly population were particularly affected, with 90% of populations aged 60 and above reporting that they could not afford essential items available in stores. This issue was most prevalent in the North and East: Ukraine JMMI</p> <p>Generally, cash assistance is thus the most preferred and efficient assistance modality in Ukraine, as also confirmed through UNHCR's and inter-agency post-distribution monitoring (PDM) exercises. In 2024, UNHCR conducted two PDMs using UNHCR's corporate PDM tools, and complemented those with shorter PDMs for the UNHCR rapid cash response. Findings confirmed beneficiaries' preference for cash as the primary assistance modality, and markets' capacity to provide required goods and services.</p> <p>https://response.reliefweb.int/ukraine/cash-working-group-cwg</p>	December 2024	Completed	<i>The Joint Market Monitoring Initiative (JMMI) was created by the CWG in March 2022 and is updated on a monthly basis. UNHCR conducts Post distribution monitoring (PDM) for its cash assistance on a regular basis since 2022 to date.</i>
3	Review and monitoring of resources allocation for NFIs	Assistant Representative - Programme	<p>In line with the above-mentioned outcomes of post-distribution monitoring, the operation has ensured a gradual significant reduction in NFI assistance from 2022 to 2024.</p> <p>Towards this aim, the NFIs distribution criteria were further revised, and now strictly apply to IDPs, and war affected populations with restricted access to markets, who are still remaining in frontline areas and people who have lost their basic items in a recent attack and are unable to receive cash assistance.</p> <p>To respond to the urgent needs of people affected by the increasing number of aerial attacks or evacuated from frontline villages, UNHCR introduced the use of rapid/emergency cash assistance in lieu of NFI – as mentioned above. The findings from August 2024 PDM on Emergency Multi-Purpose Cash Assistance indicated 84% of all respondents would like to receive assistance within one week after the incident. The PDM further indicated that the emergency multi-purpose cash assistance, is perceived as timely and has proven to be a crucial lifeline for evacuees, enabling them to meet</p>	December 2024	Completed	<i>The operation has significantly reduced its NFI stock due to the prioritization of cash assistance and</i>

		<p>their immediate needs and providing a sense of financial stability during a challenging period. The shift in assistance modality was also supported by the findings from June 2024 PDM on winterization response which showed that 71% of the respondents preferred cash assistance over in-kind.</p> <p>Furthermore, decreases and rationalization of warehousing and utilization of existing stocks have been ongoing in 2025. The operation has strategically utilized existing stock of NFIs without further procurement of NFIs since the end of 2023.</p> <p>In a move to effectively manage surplus stocks, the operation agreed in Q1 of 2025 with the Ministry of Social Policy, Family and Unity (MOSP) to donate surplus stocks to the Ministry, for further distribution to, for instance, social facilities and foster homes needing such items. It is imperative to note that current regulations in Ukraine restrict the export of relief items beyond its borders. This regulatory framework has guided our distribution strategies and plans for surplus stock management.</p> <p>Finally, as part of the operation's warehousing network optimization efforts, UNHCR closed warehouses in several locations such as Vinnytsia and Chernivtsi in 2024. Continuing with these optimization efforts, the warehouse in Uzhhorod is slated for closure by Q1 of 2026.</p>	December 2025	Completed	<p><i>discontinuation of NFI procurement. Additionally, following extensive consultations with MOSP and the Regional Bureau, the Operation secured the necessary government authorization and Regional Bureau endorsement to donate some key items to the government and, in parallel, export surplus NFIs to other UNHCR operations.</i></p>
RECOMMENDATION 3:	UNHCR should develop a coherent Accountability to Affected Populations strategy that integrates a “whole-of-house” approach as part of its wider community-based protection strategy. This should address the gap in effective feedback loops to affected people and to senior management as well as the coherence of underlying evidence streams.				
Management response:	<input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):	<p><i>While we agree with the importance of strengthening AAP, it is important to note that the operation's primary need is not the development of an additional standalone strategy. Rather, the priority is to consolidate the existing AAP mechanisms already in place across the Operation and to establish a unified, coherent feedback mechanism. This would ensure greater consistency, improved feedback loops to affected communities and senior management, and better alignment of evidence streams within the broader community-based protection framework.</i></p>				
Unit or function responsible:	Ukraine CO Representative with support from the Senior CBP Officer				
Top-line planned actions	By whom	Comments			Progress

				Expected completion date	Status	Comments
1	Mapping of AAP/CWC channels	Senior Protection Officer	Mapping of UNHCR's Accountability to Affected Populations (AAP)/Communications with Communities (CWC) channels for coherence/complementarity review and to inform and a consolidated AAP analysis based on all intake information to feed into the programme cycle. The mapping will be used to set up a unified case handling and feedback mechanism.	May 2025	Completed	<i>A comprehensive mapping of UNHCR's AAP and CWC channels has been completed and shared to assess coherence, complementarity, and effectiveness across all feedback and intake mechanisms, identifying further areas of enhancement. This consolidated analysis will inform the programme cycle and guide the design of a unified approach to AAP case handling.</i>
2	Set up of unified case handling and feedback mechanism	Senior Protection Officer / Senior Information Management Officer	Based on the mapping, options for consolidation of intake procedures, case handling and feedback mechanisms will be explored and a suitable unified system set up.	December 2025	Completed	<i>Based on the mapping, the operation is exploring options to streamline and consolidate intake procedures, case-handling workflows, and feedback channels. Work is underway to establish a unified AAP case-management system that ensures consistent processing, timely follow-up, better data analysis, and stronger accountability to affected communities. To complement this, an AAP SOP has been drafted and is under</i>

									<i>review, aiming to standardize procedures, clarify roles and responsibilities, and harmonize AAP practices across units and partners.</i>
RECOMMENDATION 4:		UNHCR Ukraine should advocate within the HCT and UNCT for a more coherent approach to Government System-strengthening and Government ownership of the response across the collective IASC system. If called upon to do so, it should be prepared to actively contribute to a process of review and mapping to determine the best means of coordinating collective system-strengthening efforts in the future.							
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree							
Reasons (if partially agree or disagree):		UNHCR Ukraine is one among many voices in the HCT and UNCT. UNHCR has continued to advocate in these two bodies, as well as bilaterally with the RC/HC and sister agencies for a coherent approach to strengthened Government systems. This advocacy contributed to the RC/HC's decision to create four UNSDCF results groups, namely Human Capital, Economy, Environment, and Institutions, – which aim to complement and support the government sectoral working groups. UNHCR co-chairs results group 4 on strengthened institutions and aims to actively participate in two of the others (yet to convene). UNHCR is also heavily engaged in the review of the cluster system and the subnational coordination mechanism to ensure these are efficient and aligned and support the government strategy (see further below under recommendation #6). Lastly UNHCR is contributing to the HCTs reprioritization of the HNRP in light of the funding crisis, and ensuring its prioritized programmes align with and complement the governments, avoid any parallel programmes.							
Unit or function responsible:		Ukraine CO Representative with support from the Deputy Representative, Senior Principal Coordination Officer & Assistant Representative (Protection)							
Top-line planned actions		By whom	Comments	Expected completion date	Progress		Status	Comments	
1	<i>As Co-chair of the results Group 4 on Peace, Justice and Strong Institutions, advocate to ensure it aligns its priority outcomes and strategy with those of the Government. UNHCR is also a member of two of the other results groups.</i>	Representative, Deputy Representative, Assistant Representative (protection)	<p>UNHCR and UNDP, as co-chairs of Results Group 4, have convened two meetings with the members and led the identification of 3 strategic priority areas for joint action:</p> <ul style="list-style-type: none"> (i) Groups at risk of being left behind have access to free legal aid to be able to access national administrative and judicial procedures and services and obtain government assistance. (ii) (Re-)Inclusion and social cohesion within and among communities and groups with varying perspectives is achieved and contributes to the stability and resilience of Ukraine. 	December 2025		Completed	With the discontinuation of the Results Groups, UNHCR remains actively engaged through the UNCT and the RCO in establishing task forces aligned with key government priorities. Priority task forces include those on social		

			(iii) Rights-based and inclusive laws and policies in priority areas for reform (including in the area of anti-corruption) and recovery are developed and adopted.			protection and IDP solutions, ensuring continued coordination and support to national efforts.
2	<i>UNHCR actively supports the RC/HC in organizing and planning the multisectoral humanitarian response in Ukraine around 4 strategic priorities (a. support to vulnerable people near the frontline; b. evacuations; c. emergency response after strikes; d. humanitarian contributions to needs of particularly vulnerable IDPs).</i>	Representative, Deputy Representative, Principal Coordinator Assistant Representative (protection)	<p>UNHCR has contributed to the identification of 4 strategic priorities (a. support to vulnerable people near the frontline; b. evacuations; c. emergency response after strikes; d. humanitarian contributions to needs of particularly vulnerable IDPs) for the humanitarian community, under the response/HNRP, and supported the development of multisectoral response plans to each of these. This was one of the action points from the HCT retreat in February 2025.</p> <p>UNHCR also recommended that the needs of the most vulnerable people in these 4 priority contexts guide the 2025 HNRP reprioritization exercise, triggered by the US funding suspension and the overall funding outlook. This recommendation was accepted by the Humanitarian Coordinator and the HCT and was used as one of the primary criteria for the HNRP reprioritisation which was concluded in late March 2025.</p>	March 2025	Completed	UNHCR has actively supported the RC/HC in shaping and coordinating the multisectoral humanitarian response around the four HNRP strategic priorities in 2025. UNHCR first played a key role in defining these priorities during the HCT retreat in February 2025 and in developing multisectoral response plans for each. For the 2026 HNRP preparation, UNHCR's technical expertise and coordination capacity have been well-recognized and appreciated by the RC/HC and within the HCT: UNHCR cluster coordinators led the development of three of the four Strategic Priority Groups that form the basis of the forthcoming issue-based HNRP, which was officially launched on 13 January 2026.
RECOMMENDATION 5:		UNHCR should further advance localization by investing in the capacity of national NGO partners and Community-Based Organisations. The 2025-2027 Multi-Year Strategic Plan offers an opportunity for UNHCR to set out a more predictable basis to support its partners.				

	UNHCR should more clearly articulate its aspirations for the support it will provide to its local and national NGO partners between 2025-2027, drawing on the tenets of the nascent localization strategy in Ukraine and UNHCR's Corporate Grand Bargain and GRF commitments.				
Management response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):	<i>[add only if partially agree or disagree was selected]</i>				
Unit or function responsible:	Ukraine CO Representative and Deputy Representative				
Top-line planned actions	By whom	Comments	Expected completion date	Progress	
				Status	Comments
1	Deputy Representative	<p>The localization efforts are well considered in the UNHCR Ukraine Multi-Year Strategy (2025-2027) which emphasizes the critical role of local actors in addressing humanitarian needs. UNHCR's approach is deeply rooted in local ownership and partnerships, with a majority of funded partners being national NGOs (13 out of 14 in 2025, receiving 99% of the funding implemented through I/NGOs; and 16 out of 22 in 2024 receiving 90% of the funding implemented through I/NGOs).</p> <p>The strategy highlights the importance of community-based organizations (CBOs) and local initiative groups, many of which are women-led, in delivering services and participating in decision-making processes. UNHCR Ukraine has been spearheading the efforts toward localization over the last years. In 2024 UNHCR's network of Community Based Organizations grew to 550.</p> <p>Further, enhanced participation of internally displaced persons (IDPs) is facilitated through the establishment of IDP Councils, formalized by Resolution 812. These local actors are pivotal in providing various responses tailored to the specific needs of vulnerable populations. By building the capacity of local authorities and CBOs, the strategy aims to create sustainable, community-driven solutions that foster resilience and recovery.</p>	December 2024	Completed	
RECOMMENDATION 6:	UNHCR should support the transition of the clusters to Government-led coordination through the following actions: <ul style="list-style-type: none"> In the context of the HCT-mandated Area-Based Coordination consultancy, advocate for a transition of the clusters to a coordination model that places the Government in leadership roles. For the clusters UNHCR leads, UNHCR should identify potential government principals who can assume a leadership role. 				

	<ul style="list-style-type: none"> UNHCR should actively contribute, within the UNCT, to the development of a coordination model for the UN's work in the areas of recovery, development and durable solutions that has a foundation in government leadership and enables a seamless transitioning of the clusters and sustainable, nexus programming. 														
Management response:	<input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially agree <input type="checkbox"/> Disagree														
Reasons (if partially agree or disagree):	<p>The UNHCR Representation in Ukraine is only one of the several cluster lead agencies in Ukraine and while UNHCR fully recognizes the need for a streamlining and rationalization of the overall cluster system, it cannot undertake this in respect of the clusters it leads in isolation from the other lead agencies, OCHA and the HC. Recently the HC, in line with the ERC's letter on the Humanitarian reset, has proposed to the HCT a package of initiatives aiming at implementing the ambitions set out by the ERC, in the Ukrainian context. This package includes a Cluster review led by a working group that will report back to the HCT with recommendations by mid-April. UNHCR has contributed substantially to WG's TOR and will provide inputs aimed at an overall reduction/streamlining of the clusters, including proposals for the transfer of responsibilities to Government or local entities to ensure a progressive transition. UNHCR inputs will be further informed by the guidance provided by the High Commissioner for Refugees in his letter of 5 March 2025 to the ERC, in which he proposes one Protection Cluster with workstreams instead of Areas of Responsibility, and no separate coordination and information management mechanism as well merging the CCCM Cluster with the Shelter Cluster.</p> <p>The top-line planned actions to this recommendation (No.6) are viewed as overlapping and complementary to the management response within recommendations No 1. and No 4.</p>														
Unit or function responsible:	Ukraine CO Representative and Deputy Representative														
Top-line planned actions	<table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">By whom</th> <th rowspan="2">Comments</th> <th rowspan="2">Expected completion date</th> <th colspan="2">Progress</th> </tr> <tr> <th>Status</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Representative, Principal Coordinator, Assistant Representative (protection)</td> <td> <p>UNHCR has consistently supported the simplification of the subnational coordination structure with input from the cluster coordinators, cluster partners as well as in our capacity as CLA.</p> <p>UNHCR has contributed substantially to TOR for a review of the cluster coordination structure and for sub-national operational coordination structures – circulated by the Humanitarian Coordinator - and remains ready to contribute to forthcoming stakeholder consultations based on the respective TOR.</p> <p>From May-December 2025, in a proactive effort to contribute to the streamlining effort and reform, UNHCR has led the gradual transitioning and phasing out of the CCCM Cluster in Ukraine. On 8 December 2025, the CCCM Cluster convened all partners at a final workshop to review how coordination and programme responsibilities are now distributed across the Protection and Shelter Clusters, relevant authorities, and local partners, and</p> </td> <td>December 2025</td> <td>Completed</td> <td>The official merging of the protection and CCCM cluster took effect on 1 January 2026, after a successful merger period.</td> </tr> </tbody> </table>		By whom	Comments	Expected completion date	Progress		Status	Comments	1	Representative, Principal Coordinator, Assistant Representative (protection)	<p>UNHCR has consistently supported the simplification of the subnational coordination structure with input from the cluster coordinators, cluster partners as well as in our capacity as CLA.</p> <p>UNHCR has contributed substantially to TOR for a review of the cluster coordination structure and for sub-national operational coordination structures – circulated by the Humanitarian Coordinator - and remains ready to contribute to forthcoming stakeholder consultations based on the respective TOR.</p> <p>From May-December 2025, in a proactive effort to contribute to the streamlining effort and reform, UNHCR has led the gradual transitioning and phasing out of the CCCM Cluster in Ukraine. On 8 December 2025, the CCCM Cluster convened all partners at a final workshop to review how coordination and programme responsibilities are now distributed across the Protection and Shelter Clusters, relevant authorities, and local partners, and</p>	December 2025	Completed	The official merging of the protection and CCCM cluster took effect on 1 January 2026, after a successful merger period.
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			ensure that site-level issues and protection concerns can continue to be raised and addressed through clear pathways in 2026.			
RECOMMENDATION 7:		UNHCR globally should review its application of area-based approaches and amend guidance to ensure that area-based approaches incorporate collective objectives and outcomes for both programming and advocacy. This should clarify UNHCR's contribution as part of a wider collaborative multi-stakeholder effort in which UNHCR has a distinct competence consistent with its mandate.				
Management response:		<input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		<p><i>As a continuation of the Global Compact on Refugees, UNHCR is pursuing sustainable response approaches to address forced displacement challenges. Fostering area based approaches is part of the sustainable response approach and supports its objectives to increase the self-reliance and inclusion of forcibly displaced people. In support of this, UNHCR's programming guidance, captured in the Programme Handbook - provides overall parameters for planning and programming and guidance on different programming approaches such as area based programming. On area based approach, the programme handbook is complemented by the <u>Guidance package for UNHCR's engagement in situations of internal displacement UNHCR</u> that provides additional guidance on area based approaches in internal displacement situations. In addition, the <u>Focus area strategic plan for protection and solutions for internally displaced people 2024-2030</u> further clarifies UNHCR's role in area-based approaches and highlights promising practices across operations. It is also underpinned, inter alia, by the principle of increasing sustainability across UNHCR's programming, including through stronger area-based approaches to trigger development investments. The plan</i></p> <p><i>In addition, UNHCR's programming approach encompasses advocacy per definition, as advocacy is part of UNHCR's delivery and programming toolbox. The programming guidance in the programme handbook covers different types of programming, including advocacy. UNHCR Advocacy Toolkit provides further and very specific guidance on UNHCR's engagement, approach and role in advocacy.</i></p> <p><i>Country operations are empowered to use UNHCR's programming approach and contextualize it based on the country specific parameters. This includes area-based approaches, collective objectives and outcomes as well as UNHCR's contribution to wider collaborative multi-stakeholder efforts.</i></p> <p><i>UNHCR continues to support country operations to make full use of existing programming approaches, operationalise the development-humanitarian nexus and share lessons learned across operations.</i></p>				
Unit or function responsible:		Division of Emergency, Programme & Supply (DEPS) with support from Division of International Protection & Solutions				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	<i>Emphasize how programming approach can be used for</i>	<i>DEPS</i>	<i>This action is part of UNHCR's wider learning and knowledge sharing agenda and embedded in ongoing activities</i>	<i>End of 2026</i>	Ongoing	

	<i>area-based development in different contexts</i>					
RECOMMENDATION 8:		Drawing on lessons from previous L3 responses, including in Ukraine, UNHCR globally should consider developing a “post L3” road map to support Country Operations in the timely planning for scale-down, in a way that protects and sustains dividends from the response. It should include practical guidance on how and when to start prioritising and planning for responsible drawdown both geographically and sectorally. The guidance should also include aspects of human resource restructuring and partner management in the context of resource reductions.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		<i>[add only if partially agree or disagree was selected]</i>				
Unit or function responsible:		Division of Emergency, Programme & Supply (DEPS)				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	“Inclusion from the Start” (part of sustainable response) helps expedite post-emergency transition to national and local actors	Emergency Service / DEPS	Deliverables include: <ul style="list-style-type: none"> - Revamped “inclusion from the start” preparedness actions offered to burea/country operations; - Revitalized and more granular support and oversight to country operations to design and implement preparedness actions (revised SOPs and monthly monitoring preparedness actions); - Include “inclusion from the start” in emergency capacity and development activities including EHB, WEM and other learning opportunities. 	December 2025	Completed	UNHCR developed an online e learning on inclusion from the start. In addition, the WEM has a strong component on inclusion from the start and in contingency planning sustainable responses and inclusion are discussed.
2	Support country operations to articulate a post-emergency plan, as part of emergency SOP	Emergency Service / DEPS	Lead a process in coordination with other divisions before the conclusion of an emergency for a country operation to articulate post-emergency aspirations including staffing, protection strategy and operational strategy		Completed	The last emergency cell meeting addresses the exit strategy and post emergency phase.
3	Prepare Emergency Deployment and staffing guidance	Emergency Service / DEPS and DPM	Develop guidance on how operations with an emergency can quickly expand and contract staffing, with a focus to avoid Fast Tracks, avoid creating new staffing positions yet ensure sufficient emergency response staffing for a short period.	Completed 2024	Completed	Internal guidance was published on post emergency staffing reviews.