

UNHCR Country Portfolio Evaluation: Morocco (2016–2019)

EVALUATION REPORT

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UNHCR Evaluation Service

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The evaluation team wishes to convey their admiration for the work of all those who defend the value of human dignity and human life, assist people in need and promote humanitarian universal values under difficult circumstances. The voices of refugees have been a lesson of humanity, resilience and hope that give meaning to any effort aimed at alleviating the suffering caused by exile.

Evaluation information at a glance	
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Executive Summary

Introduction

This evaluation was commissioned by the UNHCR's Evaluation Service and encompasses UNHCR activities in Morocco from 2016 to April 2019, with specific focus on programmatic design, implementation and outcomes, strategic positioning within broader policy frameworks and partnerships' effectiveness. The evaluation seeks to provide evidence-based recommendations that inform UNHCR's programming choices within the current operational and policy context, keeping in mind broader objectives under the Global Compact on Refugees (GCR), and Morocco's National Strategy for Immigration and Asylum (NSIA).

Methodology and Approach

The programmatic level of analysis is structured around a set of key evaluation questions concerning the effectiveness of UNHCR support to the NSIA (KEQ1) and of UNHCR interventions (KEQ2), particularly in terms of integration and livelihoods. The strategic level focuses on the roles and the added value of UNHCR in Morocco, as well as the potential of the GCR to improve local integration of refugees (KEQ3). Ten sub-questions and 63 areas of exploration were associated to the evaluation criteria of effectiveness, coherence, efficiency and coordination¹.

This evaluation uses a mixed-methods approach. The evaluation process consisted of a review of roughly 800 policy and programme documents, as well as a four-week field phase in Morocco, in which the evaluation team visited Rabat, Casablanca and Oujda. In total, 41 interviews were conducted in-person and five remotely. Ten focus groups with refugees and outreach workers in the three sites selected for fieldwork were conducted, representing a total of 70 refugees. Secondary literature reviews included a quantitative analysis of UNHCR databases (FOCUS, proGres, dashboard) and a review of a survey carried out by the International University of Rabat (IUR)².

Overview of UNHCR Morocco Programmatic Response

In a context of mixed migration, UNHCR has chosen to adopt a role that is in support of the Government of Morocco (GoM) in establishing a national asylum system. Accordingly, UNHCR's strategy was to: (i) conduct the RSD registration and procedures in conjunction with the authorities; (ii) provide humanitarian assistance and protection to refugees, supporting the National Immigration and Asylum Strategy; (iii) strengthen the institutional capacities of national actors involved in the field of asylum; and (iv) establish durable solutions for refugees by focusing on socio-professional integration, voluntary repatriation or resettlement in a third country for the most vulnerable. Strategic partnerships with a large variety of state institutions and CSOs enable UNHCR Morocco to support the process of building the asylum system (mainly through MAEIC and MDCMREAM) and provide protection services to refugees (mainly through PWG and IPs³).

¹ See Annex 11 – Evaluation Matrix.

² The IUR survey (1,000 respondents) was conducted during 2018 to assess the level of integration of refugees in Morocco, existing opportunities and barriers.

³ AMAPPE, AMPF, FOO, OMDH, Maitre Lemseguem.

Findings

Access to asylum and RSD

The partnerships with public institutions have been essential to enabling UNHCR to fulfil its mandate and support the construction of a national asylum system. They have contributed to raising awareness about asylum and refugee protection among a broad spectrum of public bodies, including security forces and justice, and have opened up protection spaces in key public services. In terms of RSD procedure, UNHCR is doing an effective job of filtering and prioritizing cases within its internal RSD process before submitting them to the BRA.

Protection and assistance

UNHCR Morocco has consistently been able to adapt its operational response to the changing flows and needs of refugees and has implemented programmes that are coherent and mostly effective⁴. Operational challenges have included: the growth in asylum-seeker arrivals, the greater diversity of countries of origin, the geographical dispersion of refugee settlement countrywide, and the emergence of new assistance needs (e.g. people with chronic diseases). UNHCR Morocco has successfully confronted both quantitative challenges (number of PoC) and qualitative challenges (intensity of needs and vulnerabilities). However, the tension between growing refugee needs and budgetary constraints has limited the scope of UNHCR's response and remains a critical challenge for the CO.

Joint collaboration between state institutions, PWGs and UNHCR Morocco, as well as the experience of CSOs and human rights organizations (e.g. CNDH, OMDH), have been essential in broadening the protection space in Morocco, setting up effective identification, referral and protection mechanisms, fostering respect for the principle of non-refoulement and resolving cases of arbitrary detention that still occur. PWGs have also decisively contributed to awareness-raising of state actors and CSOs on asylum and refugee protection, and improving communication, coordination and joint planning among a large variety of actors.

The comprehensive strategy employed by UNHCR, including PWGs, outreach missions, AGD exercises and the employment of community workers, has been effective in identifying PoC, assessing their needs and providing the relevant protection and assistance response while ensuring coverage across the territory. Highly vulnerable profiles (SGBV, women at risk, LGBTIs, UASC) are those who are exposed to major risks and who suffer most from the gaps in the national social care system, the adverse national legal framework, discrimination and UNHCR's limited capacities. The provision of accommodation for these cases remains a critical issue.

Health

UNHCR has effectively adapted its health programme to respond to growing needs, the geographical dispersion of the refugees, and the emergence of chronic diseases. However, mental health is a major challenge. The quality of service provided by AMPF makes public health services unattractive for refugees, thereby weakening the UNHCR Morocco strategy of promoting access to health care through the national health system. Rabat bears a disproportionately high burden of health-care activity and health complexity, probably due to the availability of more

⁴ See, for example, section 4.2 on RSD, section 4.4 on health, section 4.5 on education and section 4.6.5 on IGAs.

support services for refugees and better care standards. The comprehensive nature of the health intervention is generating financial tension and risks harming the continuity of the programme.

Education

The Ministry of National Education grants effective access to education at all levels, from primary school to university, and some issues with enrolment due to the mobility of refugee families are quickly addressed and solved by local authorities. UNHCR has moved away from an objective of access to state education for refugee children, and towards meeting the challenges of retaining the most vulnerable children (e.g. Syrian girls, newcomers, families on the move) and improving integration and academic performance. School drop-out rates among refugee girls are very high, and Syrian Dom girls are additionally exposed to imposed begging and forced marriage which, taken together, justify a tailored intervention in education.

The GCR and durable solutions

The favourable local conditions (despite the persistence of legal, social and cultural barriers) have led UNHCR to promote local integration of refugees as the main durable solution. However, UNHCR indicators show modest progress in terms of the economic integration of refugees. Similarly, the limited number of resettlement places highlight the overall difficulties in building an effective approach to durable solutions.

The strategy used by UNHCR to support the creation of IGAs is appropriate and relatively effective, particularly when compared with strategies for employability. However, its effect on living conditions appears to be limited, essentially because the low amount of initial capital hampers efforts to obtain a level of income that is sufficient to reinvest in the business and improve profit margins, confining refugees to a subsistence economy.

Coordination

The current coordination mechanisms at central level are gradually helping to open up protection spaces within different governmental bodies and policies and are generating synergies among actors. At local level, implementation of the NSIA appears to be weak and, for the moment, there are few regional and municipal mechanisms to coordinate a multisector and multi-partner response to protection. “Regionalizing” the national immigration and asylum policy, and especially putting protection and integration initiatives into place, is one of the major challenges to extending coordination achievements made at central level to local level.

The UNHCR mandate and the GCM in Morocco

The engagement and proactivity of the GoM in producing national action plans for both the GCM and GCR is an excellent opportunity to keep asylum and refugee protection on the political agenda. UNHCR support for the drafting of the GCR national action plan can play a significant role in ensuring specific visibility for asylum and in promoting the adoption of new national initiatives on local integration of refugees. The initiatives taken by the GoM to promote private sector involvement are also an opportunity in this direction.

Conclusions

Support to the NSIA and access to asylum

Access to asylum, freedom of movement, adherence to the principle of non-refoulement and legal protection of PoC are, in general terms, guaranteed on Moroccan territory, despite the difficulty of identifying asylum-seekers in a mixed migration context. Formal mechanisms make it possible for UNHCR and partners to intervene effectively in the event of infringements of a refugee's individual rights. The fulfilment of the UNHCR mission will rely on changes in national conditions that currently impose some limits on ensuring a complete protection space (e.g. asylum law, border areas, recognition of Syrians, LGBTIs, UASC).

UNHCR Morocco has been effective in building capacity among a large number of senior and technical officials from various state institutions at central level and in CSOs, as envisaged in the NSIA. These actions have been useful in consolidating and establishing some “building blocks” for a national asylum system, although the lack of a national asylum law and the interim status of the interministerial commission weaken the process of building the national asylum system. Despite initial progress, the process appears to have stagnated and the transfer of responsibilities from UNHCR to the GoM (“transitory period”) requires a longer time frame than originally envisaged.

UNHCR Morocco has provided effective support for implementation of key NSIA programmes in the form of technical support for the process of drafting the law on asylum, the provision of basic social services, policy dialogue and coordination or facilitating the involvement of MDCMREAM in PWGs and outreach missions. All these efforts have helped to reinforce protection spaces and create opportunities for the local integration of refugees, in line with the NSIA vision.

Target objectives in protection and assistance

The UNHCR Morocco response is well aligned with UNHCR's Strategic Directions 2017–2021 and the GCR, clearly contributing to reinforce protection and assistance and promote refugee inclusion. The involvement of state institutions (MDCMREAM and sectoral departments), collaboration with CNDH, creation of PWGs and partnerships with CSOs, acting as a network of complementary actors, have been key factors in providing reasonable levels of protection and assistance from essential services in response to increasingly complex refugee needs. Access is now consistently available, but quality and sustainability are not, and gaps persist, frequently generating feelings of frustration among the refugees.

Barriers to PoC identification and the lack of sufficient specialized state social care services are hampering appropriate and comprehensive case management of highly vulnerable cases (e.g. SGBV, UASC, people with serious illnesses, disability). Besides, assistance to refugees relies heavily on UNHCR's capacity to mobilize the network of national public and private partners.

The GCR and durable solutions (local integration, employability, private sector)

The creation of the GCR national action plan, led by MDCMREAM and supported by UNHCR Morocco, is a window of opportunity for ensuring coherence between international guidance and national application, keeping the specific characteristics of refugees highly visible as part of NSIA priorities.

UNHCR Morocco is steadily reinforcing local integration actions with greater private sector involvement and is rightly emphasizing IGAs as the most successful mechanism yet for supporting economic integration of refugees. IGA success rates are encouraging, although there is still much room for improvement. Employability and vocational training action have had very modest results. Overall, economic integration, for both IGAs and jobs, is taking place in the informal sector due to the weight of the informal economy and administrative barriers for refugees.

Recommendations

1 National asylum system and joint RSD procedure: Continue supporting state institutions (ministries, CNDH, etc.) with secondment of staff, technical assistance, institutional capacity development and participation in regular NSIA coordination forums.

2 Outreach and access to asylum and registration services:

- Continue supporting capacity-building activities regarding asylum and protection of national partners (state institutions, CSOs). In particular, work more closely in the future with lawyers and judges to establish case law favourable to PoC, in the absence of a national legal framework.
- Support organizational development and joint strategic planning with IPs to consolidate the effectiveness, quality and sustainability of CSOs' role in responding to refugees' needs in the long term.
- Capitalize on the activity of the PWGs and reinforce the linkage between PWGs and local authorities and public services at local level.

3 Assistance and access to services:

- **Health:** Review the implementation of UNHCR primary health care provision of services and conceive a new approach, together with AMPF and the MoH, to reinforce access to and the capacities of PHCs in neighbourhoods where refugees are present in Rabat, Fes and Marrakesh (potentially including UNHCR technical assistance and capacity-building for the public health system).
- **Education:** Support Ministry of National Education national initiatives to tackle early drop-out of refugee children and reinforce linkages between school, non-formal education and vocational training (apprenticeships).
- **Cash assistance:** Strengthen the link between the targeted beneficiaries in the cash for basic needs programme with the creation of IGA opportunities and enhance the complementarity of services provided to these refugees to ensure they reach self-reliance while taking into consideration their vulnerabilities.

4 Approach to durable solutions:

- Explore synergies with development actors to integrate the refugee population into national systems and programmes that are aiming for better social protection, health coverage, employability and access to finances for vulnerable and underserved groups.

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- Promote access among the refugee population to financial instruments (microcredits) for IGAs and refugees' entrepreneurial initiatives and introduce accompanying measures to ensure proper understanding and management of financial issues, opportunities and risks.
 - Develop an integrated approach containing three separate IGA access procedures, with differentiated entry criteria, procedures and financial support arrangements to better match provision to refugees' profiles.
 - Strengthen the employability component of the CO by expanding the AMAPPE team, and by establishing a permanent presence in Casablanca so that AMAPPE can deepen its partnership with CGEM and harness the full potential of the private sector in the economic capital city.
 - Strengthen resettlement arrangements for the most vulnerable refugees and continue to seek complementary pathways for accessing third countries through the issuance of humanitarian and study visas, family reunification and work programmes. Promote voluntary repatriation by making assistance more attractive, including setting up mechanisms to allow refugees to create IGAs in countries of origin under conditions similar to those existing in Morocco.

5 **Gender approach:** Review the design of the UNHCR Morocco Action Plan 2019 on AGD and reinforce its implementation through the introduction of "sector-tailored" operational measures in all programmes to contribute to the reduction of barriers and inequalities due to gender factors.

6 Apply the appropriate response to protection needs in a national context characterized by mixed migration and the transfer of responsibilities to the GoM:

- Consolidate joint technical working teams (MDCMREAM, other ministries, IOM, UNHCR, international agencies) and plan inclusive participatory exercises (including local authorities) to ensure national ownership during the development of national action plans for both the GCM and GCR.
- Strengthen operational links with MDCMREAM by creating an annual action plan and an operational coordination mechanism.
- Intensify efforts to define a common operational framework and protection standards, as well as clear and stable coordination mechanisms, between the public administration at central and local levels, CSOs and, in particular, PWGs.

Table of Contents

1 Evaluation Purpose and Rationale	13
1.1 Audiences	13
1.2 Time Frame and Geographical Scope.....	13
1.3 Key Evaluation Questions	13
1.4 Methodological Approach	14
2 Context	15
2.1 Mixed Migration Flows	15
2.2 Refugee Population in Morocco – Key Patterns and Trends	15
2.3 The NSIA, GCM and GCR	16
2.4 Migration in Morocco: Inbound and Outbound Flows	17
3 Overview of Programmatic Response	18
3.1 Asylum Procedures.....	18
3.2 Humanitarian Assistance and Protection	18
3.3 Durable Solutions	19
3.4 Capacity-Building.....	19
4 Evaluation Findings	20
4.1 Asylum Policy and the NSIA	20
4.2 Refugee Status Determination (RSD)	21
4.3 Protection and Legal Assistance	24
4.4 Health.....	28
4.5 Education	30
4.6 Durable Solutions and the GCR	31
4.7 Coordination.....	38
4.8 The UNHCR Mandate and the GCM in Morocco	39
5 Conclusions	41
5.1 Support to the NSIA	41
5.2 Protection and Assistance to PoC.....	42
5.3 Durable Solutions and the Global Compact for Refugees.....	44
6 Recommendations	45
Annexes	47

List of Abbreviations

The report uses French acronyms for national institutions plus an English translation of the full name of the institution, to facilitate comprehension for both national readers (not familiarized with English acronyms) and international readers (not familiarized with French names).

AGD	Age, Gender and Diversity
AMAPPE	Association Marocaine d'Appui à la Promotion de la Petite Entreprise / Moroccan Association to Support Small Enterprises
AMPF	Association Marocaine de Planification Familiale / Moroccan Family Planning Association
ANAPEC	Agence Nationale de Promotion de l'Emploi et des Compétences / Agency for the Promotion of Employment and Skills
BIC	Best Interests of the Child
BRA	Bureau des Réfugiés et des Apatrides / Office for Refugees and Stateless Persons
CaLP	The Cash Learning Partnership
CBI	Cash-Based Intervention
CGEM	Confédération Générale des Entreprises du Maroc / Confederation of Industries of Morocco
CNDH	Conseil National des Droits de l'Homme / National Council on Human Rights
CO	Country Operation
CSO	Civil Society Organization
CSR	Corporate Social Responsibility
CTE	Contrat de travail d'étranger
DAFI	Albert Einstein German Academic Refugee Initiative
DIP	Division of International Protection
DRS	Division of Resilience and Solutions
ECOWAS	Economic Community of West African States
ENA	Ecole Nationale d'Administration / Graduate School of Public Administration
FGD	Focus Group Discussion
FISA	Fédération Interprofessionnelle du Secteur Avicole / Federation of Poultry Industries
FOO	Fondation Orient Occident
GCM	Global Compact for Migration
GCR	Global Compact on Refugees
GDP	Gross Domestic Product
GNI	Gross National Income
GoM	Government of Morocco
HQ	Headquarter
ID	Identification
IGA	Income-Generating Activity
INDH	Initiative Nationale pour le Développement Humain / National Human Development Initiative
IOM	International Organization for Migration
IP	Implementing Partner
IUR	International University of Rabat
KEQ	Key Evaluation Question
LGBTI	Lesbian, Gay, Bisexual, Transsexual and Intersex
MAD	Moroccan Dirham
MAECI	Ministère des Affaires Etrangères et de la Coopération Internationale / Ministry of Foreign Affairs and International Cooperation
MCMREAM	Ministère Chargé des Marocains Résidant à l'Étranger et des Affaires de la Migration / Ministry for Moroccans Living Abroad and Migration
MDCMREAM	Ministère Délégué Chargé des Marocains Résidant à l'Étranger et des Affaires de la Migration / Delegated Ministry for Moroccans Living Abroad and Migration

MENA	Middle East and North Africa
MoH	Ministry of Health
MoU	Memorandum of Understanding
MPG	Multipurpose cash grant
MTM	Migration Thematic Group
NPIA	National Policy on Immigration and Asylum
NSIA	National Strategy for Immigration and Asylum
ODCO	Office du Développement de la Coopération / Office for Cooperation and Development
OECD	Organisation for Economic Co-operation and Development
OFPPT	Office de la Formation Professionnelle et de la Promotion du Travail / Office of Vocational Training and Job Promotion
OMDH	Organisation Marocaine des Droits Humains / Moroccan Organization for Human Rights
PHC	Primary Health Care or Primary Health Centre
PoC	Persons of Concern
PPP	Purchasing Power Parity
ProGres	Profile Global Registration System
PSN	Persons with Specific Needs
PISERUMA	Programme d'Insertion Socio-économique des Réfugiés Urbains au Maroc
PWG	Protection Working Group
RAMED	Régime d'Assistance Médicale pour les Démunis / Health insurance scheme for vulnerable populations
RDPP	Regional Development and Protection Programme
RECOMIG	Renforcement des collectivités territoriales dans le domaine migratoire / Strengthening selected municipalities in the management of migration
RSD	Refugee Status Determination
SDG	Sustainable Development Goals
SGBV	Sexual and Gender-Based Violence
ToR	Terms of Reference
UAM	Unaccompanied Minors
UASC	Unaccompanied and Separated Children
UGEP	Union Générale des Entreprises et Professions / General Union of Companies and Professions
UN	United Nations
UNDAF	United Nations Development Assistance Framework
UNHCR	United Nations High Commissioner for Refugees
UNTFHS	United Nations Trust Fund for Human Security
UPE	Unités de Protection de l'Enfance / Child Protection Units
USA	United States of America
VoT	Victims of Trafficking

1 Evaluation Purpose and Rationale

The Morocco country portfolio evaluation is commissioned by UNHCR's Evaluation Service and focuses on programmatic design, implementation and outcomes, strategic positioning within broader policy frameworks and the effectiveness of partnerships. The evaluation provides evidence-based recommendations that inform UNHCR's programming choices within the current operational and policy context, keeping in mind broader objectives under the Global Compact on Refugees (GCR), and Morocco's National Strategy for Immigration and Asylum (NSIA).

1.1 Audiences

The primary audience for this evaluation is the UNHCR Morocco Country Operation and Regional Bureau for MENA, UNHCR's Senior Executive Team, the Division of Resilience and Solutions (DRS) and Division of International Protection (DIP). UNHCR's partners – including government and humanitarian and development actors – serve as a secondary audience.

1.2 Time Frame and Geographical Scope

The time frame covered in the evaluation is 2016 to April 2019. Persons of concern (PoC) in Morocco are scattered among 53 urban and peri-urban locations nationwide. During the scoping mission it was agreed to focus the fieldwork in the cities of Rabat and Casablanca (including peri-urban areas), where around 60 per cent of PoC reside, and also Oujda and Nador, which serve as major entry or transiting points in Morocco.

1.3 Key Evaluation Questions

The Morocco country portfolio evaluation is structured around three key evaluation questions (KEQs) that represent major areas of focus, as follows:

Key evaluation questions	Areas of interest
1) UNHCR support to Morocco's NSIA	National capacity-building process and roll-out of the strategy, with key focus on refugee status determination (RSD)
2) UNHCR achievements in protection and assistance	Programmatic performance, with a focus on identifying key areas for strengthening operations and decision-making
3) The Global Compact on Refugees and durable solutions in Morocco	Alignment with international orientations and strategic positioning of the organization in Morocco and in mixed migration contexts

Based on discussions with UNHCR CO during the scoping mission, several modifications to the Terms of Reference (ToR) were agreed⁵, notably the prioritization of some areas of intervention, merging several sub-

⁵ See Inception Report for details.

questions and a final report structure based on an effectiveness analysis per area of intervention or programme (instead of the initial sub-questions).

1.4 Methodological Approach

The programmatic level of analysis is structured around a set of key evaluation questions concerning the effectiveness of UNHCR support to the NSIA (KEQ1) and UNHCR interventions (KEQ2), particularly in terms of integration and livelihoods. The strategic level focuses on the roles and the added value of UNHCR in Morocco, as well as the potential of the GCR to improve local integration of refugees (KEQ3). Both levels of analysis have provided inputs to identify strengths, weaknesses, opportunities, risks, lessons, conclusions and recommendations – strategically, in terms of UNHCR positioning, approach and partnerships in Morocco, and operationally in terms of UNHCR’s improved response.

The data collection process has included a documentary review (around 800 documents), semi-structured interviews (41 interviews with a 73 per cent response rate) and ten focus groups (70 refugees), integrating gender and cultural balance to collect qualitative data with refugees and outreach workers. Quantitative data analysis included reviews in the UNHCR FOCUS database (e.g. to assess income-generating activity (IGA)), Profile Global Registration System (proGres), (e.g. to identify trends in settlement and distribution of refugees by city), the dashboard (to describe arrival trends), as well as other UNHCR files. Additionally, the analysis of the International University of Rabat (IUR) survey (based on 1,000 respondents) contributed to support or confirm findings. Triangulation of evidence was done continuously throughout the data collection and analysis process. The validation process included debriefing during field visits with project teams and a workshop with UNHCR and implementing partner (IP) teams during the elaboration of the draft version.

1.4.1 Limitations

- Although the initial list of 63 areas of exploration provided a comprehensive framework of analysis, it has not been possible to assess each area with the same intensity.
- The availability of the Office for Refugees and Stateless Persons (known by its French acronym “BRA”) and the interministerial commission to meet the evaluation team and share data has been limited, especially in terms of RSD indicators and the information system. This limitation has hampered the analysis of the transfer of the RSD process to the GoM and the improvement of the national RSD system performance indicators.
- The evaluation team was supported by a French–Arabic translator and a person for note taking during some focus group discussions (FGDs). Linguistic differences between the Moroccan dialectal Arabic and the Syrian Arabic arose, requiring additional revision of notes.
- The comprehensiveness of the UNHCR Morocco intervention, supporting multi-sector programmes (legal, health, education, cash, IGA, emergency), targeting groups of diverse nationalities and sociocultural and linguistic backgrounds, the geographical dispersion of PoC, different vulnerabilities together with the large number of stakeholders, has made it challenging to balance the scope and depth of analysis.

2 Context

2.1 Mixed Migration Flows

Over the last decades, Morocco and the region became a major transit hub for sub-Saharan African migrants seeking better opportunities in Europe. European restrictions on inward regular migration have contributed to the rise of irregular migration flows in the region⁶, while Morocco has increasingly become a destination country for refugees, asylum-seekers and economic migrants seeking longer-term settlement in the country's urban centres. Immigration to Morocco is expected to increase over the next decades as a consequence of economic and demographic changes in Africa, and with the foreseen continuation of the current stringent migration policies in Europe. The sociopolitical evolution in the region may increase uncertainty and intensify asylum and migratory flows towards Morocco. The change in Morocco's migration profile occurs while it remains a country with significant social imbalances and it has lower Human Development Index Indicators than other countries in North Africa. This helps to understand the actual conditions under which migrants and refugees are received, despite Morocco's efforts to reinforce public policies and services for both host communities and newcomers.

2.2 Refugee Population in Morocco – Key Patterns and Trends

The arrival of migrant populations in Morocco has been accompanied by the arrival of refugees, mostly Syrian families escaping from war and violence and a growing number of sub-Saharan nationals. In May 2019⁷, the number of people registered with UNHCR was 8,994 persons (2,505 asylum-seekers and 6,489 refugees), compared to 5,478 at the beginning of 2016⁸, representing an increase of 64.18 per cent. Asylum-seekers represent a stable proportion of the total PoC registered with UNHCR (29.13 per cent in 2016 and 27.85 per cent in 2019)⁹. The analysis of profiles and settlement patterns of the refugee population in Morocco is presented in the following paragraphs (for more details see Annex 6):

Those under 18 years of age represent 34 per cent of the total refugee population, which highlights the importance of education as a priority sector of intervention for UNHCR in Morocco.

- Syrians remain the largest group in terms of nationality although in relative numbers it has decreased by 10 per cent due to the sustained arrival of sub-Saharan nationals. Along with Iraqis and Palestinians, Arabic speakers account for 75 per cent of the refugee population. The number of Central Africans has increased 3 per cent annually in the past two years and numbers of Southern Sudanese and Palestinians show a rapid increase in the last year.
- Eight cities (Rabat, Casablanca, Oujda, Nador, Temara, Kenitra, Tangier and Marrakesh) represent 67 per cent of the total number of refugees settled in Morocco in 2019 (80 per cent in 2016). There is a clear trend of geographic dispersion of refugee settlement.

⁶ Irregular migration is defined as movement that takes place outside the regulatory norms of the sending, transit and receiving countries.

⁷ Statistical report on UNHCR Population of concern. UNHCR Morocco – 31 May 2019.

⁸ Statistical report on UNHCR Population of concern. UNHCR Morocco – 31 December 2016.

⁹ UNHCR proGress database.

- Significantly, the number of Syrians settled in smaller cities has increased from 15.8 per cent in 2016 to 32.2 per cent in 2019, which clearly shows a pattern of mobility and settlement in provincial areas.
- When the number of refugees living in the area are taken into consideration, a high percentage of specific needs are concentrated in Metropolitan Rabat. Representing 16 per cent of the total refugee population in Morocco, Rabat accommodates 56 per cent of the specific needs in the country. With Sale, Temara and Kenitra, the metropolitan area collectively accounts for 32 per cent of the total refugee population, and represents 64 per cent of the specific needs.
- Key cities in border crossing areas, both for inbound and outbound flows (Oujda, Tangier, Nador), which concentrate relevant protection risks for asylum-seekers and refugees, show a very low percentage of specific needs. Oujda accounts for 10 per cent of the refugee population and 8 per cent of specific needs. Tangier represents 5 per cent of the refugee population and 2 per cent of specific needs.
- Oujda shows a surprisingly low percentage of refugees in the “serious medical conditions” category considering that the region is the main entry point for irregular refugee (and migrant) flows, in general arriving after long and extenuating journeys, and that the most vulnerable categories of PoC (e.g. single women, unaccompanied minors) have been exposed to high levels of violence and abuse. One possible explanation may be that refugees prefer to look for medical assistance in Rabat hospitals, especially in cases of complex or chronic pathologies, where health services are more developed and some medical specialties are more available.
- The high ratio of unaccompanied and separated children (UASC) in Oujda may be the result of the city’s proximity to Nador, which is a major entry point to Melilla (Spanish enclave) or departing area by sea to the Spanish coast.

2.3 The NSIA, GCM and GCR

In order to respond to the needs of a growing migrant population, Morocco launched a pioneering migration policy in September 2013, which resulted in the implementation of the National Strategy for Immigration and Asylum (NSIA) in 2014. Developed with a participatory approach, the four main objectives of the NSIA are to: (i) manage migration flows under a human rights approach, (ii) establish an appropriate institutional framework, (iii) facilitate the integration of legal immigrants, and (iv) update the legal national framework. The NSIA defines the national response to strategic challenges raised by migration, such as combating discrimination, facilitating access to the health system, education, training, housing and employment, among other sectors of intervention.

The Global Compact on Refugees (GCR) provides a basis for predictable and equitable burden- and responsibility-sharing among all United Nations Member States, together with other relevant stakeholders as appropriate. The GCR is not legally binding, yet it represents the political will and ambition of the international community for strengthened cooperation and solidarity with refugees and affected host countries. Acknowledging prerogatives of states to determine their own migration policies with full respect to human rights, the Global Compact for Migration (GCM) identifies ways to enhance regular migration while minimizing irregular movements.

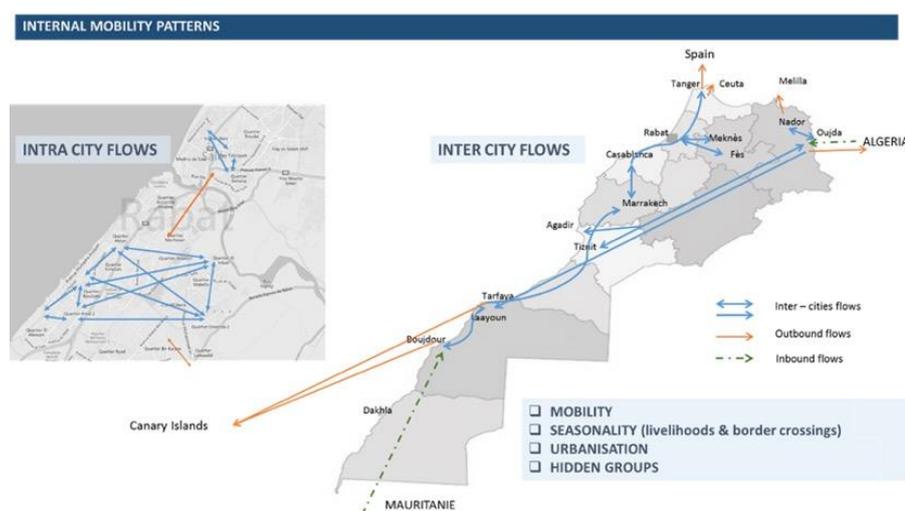
Refugees and migrants face many common challenges and have similar vulnerabilities and, especially in the context of mass migrations, they share the same routes. Additionally, both groups have the same universal human

rights. However, their treatment is governed by separate legal frameworks. The United Nations 1951 Convention Relating to the Status of Refugees is a multilateral treaty that defines who is a refugee, sets out their rights (e.g. the right to international protection) and the responsibilities of nations that grant asylum. The differences in legal frameworks are important when dealing with mixed migration flow situations such as in Morocco. The country is currently facing the challenge of developing a migration policy in all its dimensions: economic migration, refugee and asylum movements, irregular migration, victims of trafficking networks, unaccompanied minors, etc. One of the challenges of mixed migration flows is being able to identify and register PoC in need of individual international protection among groups of populations from countries not immediately considered as “generating refugees”, especially when refugees and migrants share the same routes. This is a particularly complex issue as migrants and potential asylum-seekers tend to move to and around Morocco with similar patterns.

2.4 Migration in Morocco: Inbound and Outbound Flows

Major inbound, outbound and inter-city flows in Morocco are in general shared routes by migrants, asylum-seekers and refugees (see Figure 1 below). It is worth mentioning that internal migration flows are characterized by the high level of mobility of migrant populations and also by movements related to seasonal work and seasonal opportunities to cross to Spain by sea, mainly during the summer (“inter-cities” flows). Indeed, in the spring and summer, better weather conditions favour crossings by boat and thus migrants are more likely to move to coastal areas or Northern cities in search of opportunities to cross the Mediterranean. Conversely, winter weather conditions hinder the departure of ships and migrants move to central cities such as Casablanca and Rabat in order to find stable shelter, livelihoods and social care, which are provided by a greater number of organizations than in other Moroccan cities.

Figure 1: Inbound and outbound flows



Previous studies¹⁰ have also described the presence of “intra-city” flows, in general related to employment, livelihood opportunities and access to cheaper accommodation. Casablanca airport is the main formal entry route into the country for migrants (several African countries do not require a visa for short stays, but migrants exceed the legal period of stay and remain in an irregular situation). The

main entry point for irregular immigration is located in the city of Oujda in Northern Morocco, which borders Algeria. The proximity to the Mediterranean coast, the Strait of Gibraltar and the Spanish enclaves of Ceuta and Melilla, which are all outbound points from Moroccan territory to Europe, make the north of the country and the eastern region a strategic area for the control of irregular migratory flows in a context of political and security challenges.

¹⁰ Regional Development and Protection Programme for North Africa (RDPP) – IOM, AVICENA Health and Social Projects.

3 Overview of Programmatic Response

In a context of mixed migration, UNHCR's role is to support the GoM in establishing a national asylum system. To this end, UNHCR's strategy in 2018 was to:

- conduct the RSD registration and procedures in conjunction with the authorities;
- provide humanitarian assistance and protection to refugees, supporting the NSIA;
- strengthen the institutional capacities of national actors involved in the field of asylum; and
- establish durable solutions for refugees by focusing on socio-professional integration, resettlement in a third country and repatriation.

3.1 Asylum Procedures

Pending the establishment of a national asylum system and procedure, UNHCR acts in complementarity with the institutions and policies implemented by the GoM and continues to register new asylum applications and conduct the RSD at the request of the Moroccan government. Following registration, UNHCR refers asylum applications considered to meet the criteria for recognition of refugee status to the BRA for registration with the police services. These applications are then referred to the ad hoc interministerial committee at the BRA, so that they can be regularized by the authorities. This ad hoc committee conducts hearings of refugees recognized by UNHCR, allowing them to subsequently receive a refugee card from the authorities, except for Syrians who only obtain a receipt (*récépissé*¹¹). UNHCR also provides asylum-seekers and refugees with legal assistance. UNHCR collaborates with the Organisation Marocaine des Droits Humains (OMDH, the Moroccan organization for human rights)¹² in Oujda, Nador and Tangier, as well as with Protection Working Groups (PWGs) in order to identify and refer persons seeking international protection. Approximately two thirds of all asylum-seekers registered by UNHCR are referred by NGO partners in Oujda, Nador and Tangier.

3.2 Humanitarian Assistance and Protection

UNHCR's second strategic axis in Morocco is the provision of assistance and protection services¹³ to refugees. A significant increase in the number of refugees in Morocco over the past few years and their geographically dispersed location countrywide, has created particular operational challenges. During 2018, UNHCR's multifunctional team carried out outreach missions to assess the needs of refugees and asylum-seekers together with partners, government counterparts, the Ministry of Migration Affairs, and National Mutual Aid ("Entraide Nationale"). UNHCR's interventions in the education, health, and community-based protection sectors have been

¹¹ *Récépissé* is just documentary evidence proving that the individual has been auditioned at the BRA. Although the *récépissé* is reasonably "accepted" by police forces and some authorities, it does not have the same legal value as the refugee card.

¹² OMDH is a national civil society organization working in favour of social, civil and political rights. OMDH is one of the UNHCR implementing partners in Morocco and through its local offices in Oujda and Tangier plays a key role in referrals of asylum-seekers to the UNHCR office in Rabat and in providing legal assistance and protection to refugees.

¹³ Basic needs assistance, protection house, health and education. legal assistance, community-based protection.

conducted in many locations, while the expansion of UNHCR's cash programme has further facilitated refugee outreach, especially to the most vulnerable.¹⁴

3.3 Durable Solutions

In line with the Global Compact on Refugees, UNHCR in Morocco promotes the search for durable solutions, giving priority to the local integration of refugees. UNHCR and its partners aim to provide refugees with support in their professional integration journey through the provision of skills training and individual support for professional integration or the creation of IGAs. In 2018, UNHCR assisted the creation of 88 new microprojects to support the socio-professional integration of 117 refugees. In 2017, UNHCR supported the creation of 81 microenterprises. These actions also aim to improve the employability of refugees through awareness-raising and advocacy by establishing partnerships or strengthening the capacities of public and private actors that can facilitate the professional integration of refugees. UNHCR also provides support to refugees (and in some cases asylum-seekers) who opt for voluntary repatriation. Asylum-seekers whose applications are rejected are systematically referred to the voluntary repatriation and reintegration programme managed by the International Organization for Migration (IOM)¹⁵.

UNHCR also implements a resettlement programme for refugees with specific protection needs. In 2017, 94 refugees left Morocco for the USA, Canada, the United Kingdom, France and Portugal through the resettlement programme. In 2018, 82 refugees were resettled in the USA and Canada.

3.4 Capacity-Building

Capacity-building is a key element of UNHCR's strategy to support the GoM and civil society in the establishment of an asylum system, particularly during the transition period of gradual hand-over of RSD responsibility to the authorities¹⁶. While there is no asylum law yet, there is also a great demand for training on migration/asylum matters from institutions and civil society¹⁷. In 2018, UNHCR organized some 43 training events during which over 2,057 people were reached¹⁸. A large number of government officials, judges and academics were sponsored to take part in international training sessions and conferences¹⁹. As part of its capacity-building efforts, UNHCR has also been providing two types of technical assistance (i.e. Geneva experts to comment the draft laws on asylum and secondment of a resident expert on local integration in the Delegated Ministry for Moroccans Living Abroad and Migration – known by its French acronym "MDCMREAM").

¹⁴ UNHCR, 2018 Year-end report, Morocco.

¹⁵ Appui à la transition vers un système national d'asile. Note sur la stratégie d'intervention du HCR Maroc pour l'année 2019.

¹⁶ Capacity-building actions covered asylum system/RSD and protection themes such as SGBV, child protection, education, health, code of conduct/PSEA, legal protection and AGD approach.

¹⁷ UNHCR, 2018 Year-end report, Morocco.

¹⁸ On average, more than 2,000 people per year receive some sort of training or awareness-raising.

¹⁹ UNHCR Morocco, Overview of capacity-building, ongoing and planned, April 2019. See also: In 2018, UNHCR organized some 43 training events during which over 2,057 persons were reached (UNHCR Morocco end of year report, 2018).

4 Evaluation Findings

4.1 Asylum Policy and the NSIA

The partnerships with public institutions have been essential to enable UNHCR to fulfil its mandate and support the construction of a national asylum system. They have contributed to raising awareness about asylum and refugee protection among a broad spectrum of public bodies, including security forces and justice, and have opened protection spaces in key public services; but the partnerships have been only partially effective in terms of facilitating the local integration of refugees. In terms of RSD procedure, UNHCR is doing an effective job of filtering and prioritizing cases within its internal RSD process before submitting them to the BRA.

Partnerships with state institutions have been progressively put into place since 2007, when the Memorandum of Understanding (MoU) between the GoM and UNHCR was signed. This MoU laid the groundwork to enable UNHCR to carry out its mandate²⁰ of protection in the country, with the Ministry of Foreign Affairs and International Cooperation (known by its French acronym “MAECI”) as the main official counterpart, the BRA and the ad hoc interministerial commission as the two offices in charge of the national RSD process, and the Delegated Ministry for Moroccans Living Abroad and Migration (known by its French acronym “MDCMREAM”)²¹ as the operational department implementing the NSIA. These strategic partnerships have been effective in putting into place several institutional building blocks of a national asylum system. For illustrative purposes, these include technical assistance to the draft law on asylum, support to an interim national RSD mechanism, support to the implementation of the NSIA, respect of the non-refoulement principle and the security and freedom of movement of PoC, communication and awareness-raising about asylum and refugee-related specifics throughout the public administration and security forces, the creation of protection spaces in public services and programmes, and the adoption of some administrative and operational measures to reduce barriers to the economic integration of refugees, among other aspects.

In terms of the legal framework, UNHCR has made available to the GoM international expertise on asylum and has submitted a set of confidential comments on the draft refugee law to MAECI (April 2014) and MDCMREAM (September 2016, 2018) in order to improve the scope of its protection. UNHCR comments made reference to the difficulty of identifying PoC at borders and in transit areas and the organization currently remains available to continue supporting the authorities with the legal framework.

Since the establishment of the NSIA, UNHCR has been granting protection and assistance to refugees and asylum-seekers, coordinating referrals to public services, and supporting the GoM to transition and establish a national asylum system. While the overall objective of UNHCR is still to support the NSIA, one of its key strategic axes is to pursue registration of asylum-seekers and RSD, in close coordination with the Moroccan authorities, in an attempt to build national capacity and gradually transfer responsibility²². Under the current NSIA, the GoM reactivated the BRA, which had been inactive since 2003. Under this office, an interministerial ad hoc commission for the regularization of refugees was established, together with a quasi “joint” RSD procedure under which

²⁰ General Assembly Resolutions, the 1951 Refugee Convention and the 1967 Protocol, and regional refugee instruments explicitly give UNHCR a role in supervising the application of the 1950 Convention by States, while States accept a duty to cooperate with UNHCR. This two-pronged legal foundation has given UNHCR independence.

²¹ Both BRA and MDCMREAM are attached to MAECI.

²² UNHCR COP 2020 Operations Plan Document.

UNHCR registers asylum-seekers who are subsequently registered by the Moroccan authorities: UNHCR undertakes RSD and refers cases to the MAECI, which in turn refers to the ad hoc commission those who are deemed in need international protection, for recognition as refugees and regularization by the authorities. Pending the finalization of the asylum law, this is a pragmatic mechanism, which allows for regularization by the GoM of those refugees processed by UNHCR²³.

Following these hearings of asylum applicants, the BRA provides regularized refugees with a refugee card (except for Syrians, who receive a “*récépissé*”²⁴) and the Ministry of Interior provides them with a residence permit (one year, renewable). UNHCR has an observatory role during the hearings and also ensures the scheduling of the auditions. In general, the tailored and adapted approach that UNHCR has developed with the BRA and MDCMREAM has allowed the national RSD mechanism to function with relative stability.

UNHCR has also been supporting MDCMREAM by the secondment of a staff member to work directly at the Ministry office in order to assist the implementation of the NSIA. The resident technical adviser addresses migration questions and not just the treatment of refugees as per UNHCR’s mandate. This is a consistent approach by UNHCR, as it enables the organization to position itself as a key counterpart of the Ministry, keeps refugee protection visible within the NSIA and facilitates a policy dialogue on asylum in a wider mixed migration context. The fact that MDCMREAM has integrated this UNHCR representative to provide technical assistance to its team since 2014 also shows that UNHCR is institutionally well positioned despite some circumstantial difficulties.

UNHCR has facilitated the inclusion of refugees in the two regularization campaigns of migrants in irregular situations and has regularly advocated for a smoother release of residence permits for refugee applicants recognized by the BRA. The UNHCR advocacy approach has also included different ministries in order to improve refugee rights in the country (in particular, with a view to facilitating local integration and access to work). In recent years, UNHCR has also been providing training to ministries, order forces, judiciary bodies, lawyers, academics and civil society around the issues of refugee law, asylum and RSD²⁵.

The Ministry of Interior plays a crucial role in managing the security implications of the national migration policy (e.g. coordination of regularization campaigns for migrants in irregular situations in 2014 and in 2017 measures to combat human trafficking and smuggling). At present, significant areas of the UNHCR mandate concerning asylum (e.g. access to asylum at the border) are outside UNHCR’s scope of action in Morocco. While the collaboration of Ministry of Interior authorities is effective, UNHCR continues to advocate for the adoption of a national refugee law which will guarantee the establishment of a national asylum procedure.

4.2 Refugee Status Determination (RSD)

UNHCR is doing an effective job of filtering and prioritizing cases within its internal RSD process before submitting them to the BRA.

In terms of RSD, UNHCR data show that the Country Office (CO) registered 3,900 people in 2018, 19 per cent more than in 2017, when 3,273 people were registered. The year 2018 thus marked a return to the high levels of

²³ UNHCR, ToR Evaluation Morocco.

²⁴ *Récépissé* is just documentary evidence proving that the individual has been auditioned at the BRA. Although the *récépissé* is reasonably “accepted” by police forces and some authorities, it does not have the same legal value as the refugee card.

²⁵ UNHCR Morocco, Overview of capacity-building, ongoing and planned, April 2019.

2015 and 2016, when the number of people registered was twice that seen in previous years. Amongst other notable points, it is worth mentioning:

- The number of RSD interviews increased by 36 per cent between 2016 (955) and 2018 (1,299).
- The Syrian population has steadily fallen as a percentage of the total registered refugee population in Morocco (from 40 per cent in 2016 to 20 per cent in 2018). This decrease in relative numbers is mainly due to the increase in the registration of nationals from Guinea, Yemen, Nigeria, South Sudan and the Central African Republic.
- The registration of nationals from sub-Saharan Africa rose from 1,975 individuals in 2017 to 2,618 in 2018, an increase of 32 per cent.
- Nationals from Guinea, Cameroon and Côte d'Ivoire are particularly affected by sexual and gender-based violence (SGBV).
- The majority of UNHCR card renewals were processed in Rabat (70 per cent in 2017 and 79 per cent in 2018), despite UNHCR outreach missions to the provinces to facilitate access to the procedure in other cities. The Rabat metropolitan area notably hosts only 32 per cent of the country's total refugee population.
- The average waiting time from registration to the first RSD interview continued to decrease in 2018, from seven months to six months.

Furthermore, UNHCR's efforts have contributed to an increase in the number of cases processed, the end of routine examination of requests from South Sudanese and Palestinians through the normal RSD procedures has freed up programming places for other nationalities. Moreover, Yemenis, Syrians, South Sudanese and Palestinians are not routinely scheduled for determination interviews, because their need for international protection is recognized at registration. UNHCR Morocco has also set up internal accelerated registration and RSD procedures for groups in need of priority protection (unaccompanied minors, SGBV, trafficking victims, LGBTIs). Among LGBTIs, some cases are considered for an emergency resettlement request. A higher risk has been identified for LGBTIs given that homosexuality is punished in Morocco²⁶.

In 2018, 222 decisions concerned victims of SGBV, which was 20 per cent higher than in 2017. Thirty-seven per cent of this population have been recognized as refugees, with victims of violence not always having a fear of persecution in their country of origin, or their claims presenting credibility problems²⁷. On the other hand, only 16 (9 per cent) of the 183 unaccompanied minors whose applications were examined were recognized as refugees.

What is clear from this data set is that UNHCR is already doing an effective job at filtering and prioritizing cases before submitting them to the BRA. This is essential in order to maintain its credibility and to present only those cases that need international protection through the added value of an official refugee status.

²⁶ Article 489 of the Moroccan Penal Code; LGBTI refugees are de facto excluded from the government-led regularization procedure for UNHCR-recognized refugees, and remain vulnerable to arrest and prosecution, as well as to physical assault, harassment and discrimination (UNHCR Morocco, Information note on LGBTIQ persons of concern in Morocco, 31 March 2019).

²⁷ UNHCR Morocco, Enregistrement et DSR Rapport Annuel 2018.

4.2.1 Government Capacity to Own the RSD Process: Opportunities and Challenges

UNHCR has developed an effective and appropriate response to the specificities of the national context and has acquired enough experience and credibility to be in a position to start planning a steady and orderly transfer of responsibilities to the GoM. Members of the ad hoc interministerial commission have received training on international refugee law and asylum law and have visited the UNHCR office in Rabat to gain a better understanding of how the UNHCR RSD process functions. UNHCR is present as an observer during the ad hoc commission sessions for regularization of refugees. However, available UNHCR information on countries of origin or BRA statistics on finally approved cases have not yet been shared between the two parties²⁸. While the process is in its infancy, the transition towards a GoM-owned RSD should capitalize on existing opportunities and progress and will need to overcome some obstacles.

Opportunities

- UNHCR has very good relationships with and a good reputation among national authorities; MDCMREAM considers UNHCR to be one of the key partners in the implementation of the NSIA, and other institutional partners have mentioned their satisfaction with the fruitful cooperation with UNHCR and the sense of mutual respect.
- Political orientations concerning mixed migration, the creation of the NSIA and the reactivation of the BRA (among other institutional decisions) have opened the political and social debate on asylum and have facilitated the deployment of UNHCR action.
- Support for implementation of the NSIA has been noticeable in some areas in 2018, i.e. with the renewed enforcement of the interministerial coordination mechanism under MDCMREAM, which is now open to international organizations. This means that UNHCR, as a United Nations agency, has a good opportunity to influence NSIA processes on issues concerning asylum.
- The adoption of the GCM and GCR present a good opportunity for UNHCR to carry out advocacy and provide technical support to national authorities. There is a high level of interest and international debate on migration, and the GoM wants to position itself as a key player for Africa.

Challenges

- In terms of asylum law, the lack of a national legal framework is a limiting factor, insofar as clear responsibilities, roles and processes still have to be designed and put in place. The submission to parliament of the draft asylum law has suffered several administrative delays, despite UNHCR and other civil society partners having provided several rounds of comments on the initial draft.^{29,30} The regularization of UNHCR-recognized refugees was put on hold due to the interruption of BRA hearings from March 2017 to December 2018, resulting in a backlog of refugees waiting to be regularized, but is now being

²⁸ It seems that the BRA is not maintaining statistics for lack of personnel and/or capacity.

²⁹ UNHCR COP 2019 Operations Plan Document.

³⁰ The GoM is in the process of developing new migration legislation which includes an asylum law, a new migration law and an anti-trafficking law. While the three laws were expected to pass through parliament at the beginning of 2016, only the anti-trafficking law was submitted and adopted.

implemented. Moreover, there is no possibility³¹ of applying for refugee status at the BRA directly without first registering with UNHCR, even for family members of refugees who are already recognized and regularized.

- The interim character of the interministerial commission, after five years of operation, does not help with stabilization of the RSD process and integration of the process into national structures. Within the current joint transitory system, the Moroccan authorities are able to issue refugee cards after validating individual cases. Without the law, however, it is not clear if the commission will continue to function in the same way as it does now.
- There is no procedure in place for persons seeking asylum at airports or other points of entry (disembarkation points are now particularly important, as the Royal Navy is actively cooperating with the Spanish Navy in rescuing drifting ships at sea with irregular migrants and potential PoC) with the risk that PoC may be denied entry and returned to their country of origin. In a mixed migration context, it is important to ensure that asylum-seekers have direct access to RSD processes upon arrival.
- The GoM has not yet determined the status to be granted to Syrian refugees. Currently, Syrian refugees receive a UNHCR asylum-seeker document and they have access to the services provided by UNHCR implementing partners, but no legal decision has been taken about their status, which negatively affects their ability to obtain residence permits.
- Some refugees documented via the refugee process face difficulties with the issuance or renewal of residence permits, due to the same restrictions that face regularized migrants.

4.3 Protection and Legal Assistance

UNHCR Morocco has consistently adapted its operational response to the changing flows and needs of refugees during recent years and has implemented programmes that are coherent and mostly effective. Operational challenges have been posed by the steady growth in asylum-seeker arrivals, the greater diversity of countries of origin and sociocultural profiles, the geographical dispersion of refugee settlement countrywide, and the emergence of new assistance needs (e.g. people with chronic diseases). UNHCR Morocco has successfully confronted both quantitative challenges (number of PoC) and qualitative challenges (intensity of needs and vulnerabilities). However, the tension between growing refugee needs and budgetary constraints has limited the scope of UNHCR's response and remains a critical challenge for the CO.

Joint collaboration between state institutions, PWGs and UNHCR Morocco, as well as the experience of civil society organizations (CSOs) and human rights organizations (e.g. National Council on Human Rights (known by its French acronym "CNDH"), Moroccan Organization for Human Rights (known by its French acronym "OMDH")), have been essential in broadening the protection space in Morocco, setting up effective identification, referral and protection mechanisms, fostering respect for the principle of non-refoulement and resolving cases of arbitrary detention that still occur. PWGs have also decisively contributed to awareness-raising of state actors and CSOs on asylum and refugee protection, and improved communication, coordination and joint planning among a large variety of actors.

³¹ During the scoping mission for this evaluation, a BRA official mentioned that it is possible for asylum-seekers to go directly to the BRA to submit their applications, although this is a mechanism that has not yet been used.

The comprehensive strategy employed by UNHCR³², including PWGs, outreach missions, age, gender and diversity (AGD) exercises and the employment of community workers, has been effective in identifying PoC, assessing their needs and providing relevant levels of protection and assistance (legal, education and health) while ensuring coverage across the territory.

Highly vulnerable profiles (mainly victims of SGBV, women at risk, LGBTIs and UASC) are those who are exposed to major risks and who suffer most from the gaps in the national social care system, the adverse national legal framework, discrimination and UNHCR's limited capacities. The provision of accommodation for these cases remains a critical issue if a basic level of physical protection is to be granted, despite multiple efforts by CSOs and UNHCR.

The assessment of protection needs and risks is done in a number of ways: in Rabat, individuals can go directly to the UNHCR office and have themselves registered. People with specific profiles receive a hearing with a specialized protection officer, mostly on the same day, in which needs and vulnerabilities are assessed further. UNHCR partners can also refer cases, either directly from Rabat or through PWGs³³ in other cities³⁴. PWGs have been set up in Oujda and Nador (2014–15), Tangier (2017) and Casablanca (2018). While “mobile registration” operations would be ideal from UNHCR’s point of view, these have not been allowed by authorities. Not everyone can travel to Rabat for registration and, in some cases, IPs help with transport costs.

UNHCR is constantly working together with PWG members, and in particular with the OMDH, to identify vulnerable groups across the country and refer them to the UNHCR office in Rabat. For UNHCR, PWGs have opened up a great opportunity to access NGOs and state actors in remote cities who are receptive to including refugees in their existing services intended mainly for migrants.

Community mobilization activities started in 2016, including regular community dialogues that have proven to be a powerhouse of community capacity-building and contributed to identify needs³⁵. These combined strategies allow UNHCR to be aware of key risks and issues affecting refugee protection in the territory; nevertheless, given the spread of PoC throughout the country (in 53 cities), there remains the challenge of swiftly identifying and referring vulnerable cases and asylum-seekers to UNHCR in Rabat for registration and the RSD process, in a context of mixed migration.

UNHCR has built strategic partnerships with key CSOs, selected as IPs on the basis of their experience and through a competitive and transparent tender process, which provide a wide range of services including legal protection (OMDH), social care and education (Foundation Orient Occident (FOO)), medical assistance and access to care (Moroccan Family Planning Association, known by its French acronym “AMPF”), and local integration (Moroccan Association to Support Small Enterprises, known by its French acronym “AMAPPE”) partnerships over time, balancing institutional requirements and standards for IP selection and renewal with a degree of stability that enables IPs to improve their operations and quality of work year after year. The sum of these partnerships has enabled UNHCR to considerably increase its operational capacity to cover all fields of action concerning the

³² See Annex 9 for an analysis of UNHCR Morocco roles.

³³ See Annex 7 – PWGs.

³⁴ PWGs are platforms set up by UNHCR, IPs and other CSOs working on human rights and the protection of the rights of refugees, asylum-seekers and other people in need of protection (e.g. victims of human-trafficking). Key objectives of the PWGs are coordination and information-sharing, identification and referral of PoC, and provision of assistance to the most vulnerable cases.

³⁵ The number of community volunteers has been increased from eight refugees in four cities (early 2016) to 22 refugees in 11 cities (since 2018). The field officers’ posts have been largely created after the outreach missions for UNHCR major partners such as FOO, AMPF and OMDH in Fes, Tangier and Marrakesh.

protection and integration of refugees. Working through IPs has also enabled UNHCR to extend its geographical coverage by rolling out programmes in as many cities as possible and, particularly, in border areas where UNHCR still has limited direct access to refugees. In general, the development of partnerships with CSOs is a particularly efficient working mechanism for UNHCR, allowing it to keep some control of costs and deliver results in a context of limited funding.

Since 2016, UNHCR staff and IPs have been carrying out additional outreach missions in Agadir, Fez-Meknes, Marrakesh, Beni Mellal and Khouribga. IPs usually have no presence in these regions and, before the outreach missions, no community refugee workers were active there³⁶. During the outreach mission, all partners listened to the needs of the refugees and found solutions adapted to each situation (“one-stop shop” strategy).³⁷ In order to achieve the best protection and assistance services for refugees in the region, UNHCR has organized regular coordination between local institutional, civil and international actors to maximize joint efforts. UNHCR is fostering an inclusive approach towards its partners by inviting and coordinating with all associations that have previous experience working with migrants in every location.

Challenges to outreach and provision of services include the diversity of refugees, their different profiles, contexts of origin and scattered locations around the country. According to UNHCR staff, cultural barriers and women’s limited participation make community-based protection challenging. UNHCR aims to be more present in the field to provide information, gain the trust of communities and improve its involvement in risk assessment, protection and assistance response, including for SGBV cases. For several reasons, outreach missions with UNHCR involvement have recently stalled, as support from national institutions has fluctuated or financial resources were not available.

Additionally, 20 community workers have been recruited in various cities to promote community mobilization, strengthen participation in refugee programmes and facilitate communication between communities, partners and UNHCR. They are playing a key role to provide target groups with information and identify vulnerable cases for referral to partner organizations in a large multicultural and multi-city environment. In FGDs, community workers repeatedly expressed frustration about their status. There is an unresolved tension between two divergent visions of the community worker role: they can be seen on the one hand as quasi-voluntary figures, proactively engaged in general issues of interest to their communities of origin, and on the other hand as skilled professionals with well-defined responsibilities and working conditions, who deserve career development opportunities.

4.3.1 Access to Legal Aid

The UNHCR legal partner and his network covers the entire country for a range of different issues: birth registration (important to avoid statelessness), complaints about assault against PoC, administrative decisions against asylum-seekers, cases where a person comes into conflict with Moroccan law, etc. On occasion local authorities or judges are not aware of the rights of foreigners on Moroccan territory or of the legal value of UNHCR documents. Given the number of cases and the way they are distributed throughout the country, the lawyer in charge has difficulty in managing all the legal cases countrywide. The analysis of FOCUS indicators shows a modest level of reporting of legal assistance provided to PoC in the UNHCR database; only the number of SGBV incidents for which survivors receive legal assistance over two years is reported. No other data are available for other population groups in the FOCUS database, even though the lawyer creates detailed monthly reports covering all legal cases. Legal

³⁶ Meanwhile, 20 community workers have been recruited and mobilized, covering most urban centres.

³⁷ UNHCR Morocco, Note du concept de Mission d’Outreach à Agadir, April 2018 [Concept Note for Agadir Outreach Mission].

assistance is provided to all cases of PoC referred by UNHCR and its partners, and the outcomes of interventions against arbitrary detention or alleged refoulement are, in general, positive.

4.3.2 Protection Houses

Protection houses are in place to provide better protection for people in vulnerable situations and at greater risk who receive the various services offered by FOO and UNHCR. Currently, there are five protection houses (of which one is an emergency house) in Rabat and during the first six months of 2018 they accommodated 45 refugees and asylum-seekers. In 2018, 66 per cent of beneficiaries were refugees and 34 per cent were asylum-seekers referred by UNHCR, with an occupancy rate of 88 per cent in the five apartments. Beneficiaries of this programme comprised 51 per cent women and 49 per cent men³⁸. In FGDs, LGBTIs complained that they often face discrimination and harassment even inside protection houses, where they must live in proximity to other refugees who do not appreciate their presence. Some have been harassed directly outside the protection house.

4.3.3 Key Challenges for the Protection of Vulnerable Profiles

Table 1: Key challenges for protection of vulnerable profiles

Cash assistance	Beneficiaries of financial assistance are identified and determined through a selection committee comprising members of UNHCR and civil society partners. Decisions are taken on a case-by-case basis, and home visits make it possible to reassess needs and decide whether to continue or terminate assistance. The limited UNHCR budget is a constraint, as financial support is cut prematurely when in many cases people are still vulnerable.
Single mothers and women at risk	In FGDs, women revealed that the amounts in Moroccan Dirham (MAD) they receive are not enough to cover all needs. Given the limited prospect of finding legal long-term employment, some women revealed that they resort to prostitution in order to cover their basic living expenses. Women from sub-Saharan Africa have experienced discrimination and harassment, at times including violence (e.g. robberies while withdrawing UNHCR cash assistance at the post office).
Unaccompanied minors and minors with disabilities	The Committee on the Determination of the Best Interests of the Child ³⁹ (BIC) meets once a month. It is often the case that children who have escaped their country to avoid forced marriage or genital mutilation have no interest in going back to their communities of origin. This means that resettlement to a third country is often the only durable solution. Voluntary repatriation cases are discussed with IOM in order to avoid duplication. One critical issue is the accommodation of minors. Challenges to the implementation of the child protection strategy relate to the urban dimension of the intervention, travel to other cities and working via partners. Additionally, children move within Morocco, resulting in high rates of school drop-out.
LGBTIs	As LGBTIs are not regularized as refugees by the GoM, UNHCR continues to renew their asylum certificates and provide them with assistance. Access to medical and psychosocial support is challenging for this group, who are often discriminated against and treated with disrespect. UNHCR undertakes accelerated RSD for the most vulnerable.

³⁸ UNHCR Morocco, Rapport annuel logement 2018 [Annual Housing Report].

³⁹ UNICEF, UNHCR, FOO, AMPF.

SGBV

Refugees from the Middle East and North Africa (MENA) may experience child marriage, denial of access to opportunities including education, restricted movement, domestic violence and exploitation of women for begging. Sub-Saharan African refugees are found to experience rape, sexual harassment, trafficking, survival sex, violence against LGBTI people and domestic violence. A survey found that the perceived risks for SGBV are higher for sub-Saharan African PoC on average than for those from MENA. Arabic-speaking women for cultural reasons seem to prefer to remain within their family and community (despite episodes of domestic violence and forced marriage). Leaving their closed community would paradoxically mean losing the theoretical protection that the community itself can provide. Very few people in such situations decide to denounce their aggressor. While the numbers have increased, identification of SGBV survivors remains challenging, and the geographical gap in coverage has negatively impacted the effectiveness of the SGBV response programme. Financial assistance remains insufficient; the 2018 cash-based intervention (CBI) and SGBV research has shown that the multipurpose grant is insufficient to cover basic needs and the majority of victims would continue adopting negative coping mechanisms⁴⁰.

4.4 Health

UNHCR has effectively adapted its health programme to respond to growing needs, to the geographically dispersed location of the refugees, and to the emergence of chronic diseases. However, mental health is a major challenge.

The quality of service provided by AMPF makes public health services unattractive for refugees, thereby weakening the UNHCR Morocco strategy of promoting access to health care through the national health system.

Rabat bears a disproportionately high burden of health-care activity and health complexity while hosting just 16 per cent of the refugee population (32 per cent if the metropolitan area is included), probably due to the availability of more support services for refugees and better care standards.

The comprehensive nature of the health intervention is generating financial tension and risks harming the continuity of the programme.

Formally, refugees in Morocco (regardless of legal status) have access to emergency health services, essential maternity and child services, and primary health care (PHC) facilities free of charge. Several Ministry of Health (MoH) “circulars” (2003, 2008) and hospital rules of procedure (2011) have formally defined the scope of services and the mechanisms of access. In 2015 and 2017, two framework conventions were signed between various government bodies to ensure basic health-care coverage (with services similar to RAMED⁴¹) for refugees and migrants with residence permits. However, these have not yet been enacted, due to funding constraints.

In practical terms, and despite progress in the right direction in recent years, financial, administrative and social barriers of access to PHC facilities persist in some cases, as reported by CSOs and a recent IUR survey⁴² (e.g. cost of transportation, cost of medicines and tests, residence certificates, birth certificates, discrimination). Access to secondary and tertiary hospital care is in theory granted but, in such cases, financial costs (e.g. high hospital

⁴⁰ UNHCR, Cash-Based Interventions (CBI) and Improving SGBV Prevention and Response in Morocco, April 2018.

⁴¹ A medical insurance scheme for vulnerable social groups.

⁴² Jean-Noël Ferrié et al. (2019) Étude sur l'intégration des réfugiés au Maroc. UIR, Laboratoire d'études politiques et de sciences humaines et sociales.

fees for uninsured persons, transportation costs from place of residence to hospital premises) and administrative issues (e.g. proper identification, residence permits, lease contract to prove formal place of residence) are insurmountable barriers for refugees.

To cope with these difficulties, via IPs – initially Action Urgence, then AMPF since 2018 – UNHCR has been advocating and providing support to facilitate access to PHC and essential health programmes (e.g. mother and child, vaccination), to refer patients to hospitals (specialized care and complex cases) and to provide financial support to cover hospital fees, diagnostic tests and treatment on a case-by-case basis. UNHCR and IPs have been working together to change the strategy for PHC provision to refugees, moving from direct assistance provided by IPs to supporting refugees in accessing public PHC. This change is consistent with the national legal and policy framework (NSIA, MoH “circulaires”) and several public health actions designed to help with the inclusion of refugees and migrants in key health programmes and services.

Overall, UNHCR’s efforts have enabled comprehensive health coverage to be granted to refugees; geographical coverage has increased from 26 per cent of the refugee population in 2016 (Rabat and Oujda) to around 60 per cent of the refugee population in 2019 (with AMPF health facilities in Rabat, Oujda, Casablanca, Tangier, Fes, Marrakesh and Agadir). PHC coverage is ensured through public primary health centres and AMPF facilities. Secondary-level care is provided through AMPF specialists⁴³ or via referral to public hospitals (provincial or regional). Complex cases requiring tertiary-level care are referred to public hospitals on a case-by-case basis, in accordance with the individual’s vulnerability assessment.

However, efforts to improve health coverage and quality, coupled with steady growth in the number of refugees, is leading to an increase in the demand for health services and some unexpected effects. More and better health services (improved and more attractive offer) generally result in more intense use of health services (increased demand). In this context, the attempt to reinforce provision of PHC through the national public health system does not appear to be achieving the expected results. Although the number of refugees assisted in public primary health centres is not available, the number of cases assisted in IP PHC facilities⁴⁴ has increased from 1,564 cases (2016) to around 2,300 cases (2018) and, if the trend continues, may reach 3,000 cases in 2019. Rabat saw the highest proportion of PHC consultations in AMPF centres in 2018 (31 per cent), followed by Marrakesh (27 per cent) and Fes (24 per cent). This is the result not only of the increase of refugees in the country but also of the attraction that AMPF health centres have for the population.

Refugees’ needs and demands for specialized care and UNHCR health coverage (inpatient care, medicines, tests) are also showing a constant increase. The main types of specialized consultations that took place between 2016 and 2019 were: mother and child care (25%), psychiatry (12 per cent), cardiology (9 per cent), and ophthalmology (9 per cent). These figures are representative of the epidemiological profile of refugees settled in Morocco. The extent of morbidity and mortality of this population in the host country results from the exacerbation of previous chronic conditions that require continuing treatment, frequently over the long term⁴⁵.

⁴³ Obs/Gynae; Endocrinology; Dermatology; Paediatrics; Ophthalmology; Cardiology; Stomatology; Urology; Gastroenterology; Respiratory Medicine; ENT; Psychiatry; Haematology; Neurology; Hepatology.

⁴⁴ Action Urgence and AMPF bi-annual reports.

⁴⁵ Caroline Abu Sa’Da and Micaela Serafini (2013) Humanitarian and medical challenges of assisting new refugees in Lebanon and Iraq. *Forced Migration Review* No. 44.

In this context, UNHCR spending on medicines showed an 80 per cent increase between 2016 (1.4 million MAD) and 2018 (2.5 million MAD)⁴⁶. Similarly, specialized medical consultations doubled (from 1,267 consultations in 2016 to around 2,500 consultations in 2018). In 2016, Action Urgence assisted 210 patients with severe disease and in 2018 (over eight months), AMPF assisted 1,004 patients with severe disease. AMPF's analysis of the cost of caring for severe cases⁴⁷ shows a monthly expenditure of 172,034 MAD, with Rabat having the highest costs of medical care (64,910 MAD, representing 38 per cent of the total monthly cost)⁴⁸ and the largest number of severe cases (62 per cent of all severe cases). These factors are a cause of budget stress for the CO, with health-care costs ranking among the highest expenses and contributing greatly to operational workload for the teams in Rabat.

4.5 Education

The Ministry of National Education grants effective access to education at all levels, from primary school to university, and issues with enrolment due to the mobility of refugee families are quickly addressed and solved by local authorities. UNHCR has moved away from an objective of gaining access to state education for refugee children and towards meeting the challenges of retaining the most vulnerable children (e.g. Syrian girls, newcomers, families on the move) and improving integration and academic performance. School drop-out rates among refugee girls are very high and Syrian Dom girls are additionally exposed to imposed begging and forced marriage which, taken together, justify an intense and tailored intervention in education.

Education is considered by UNHCR Morocco to be an essential strategic pillar for building durable solutions, aligned with SDG4, which aims to “ensure inclusive, equitable and quality education and promote lifelong learning opportunities for all”. It views education as an investment in the capacities of future generations and sees financial assistance in education as having a transformative purpose that goes beyond the assistance itself.

The characteristics of the refugee population, particularly its youth, presents a significant challenge to UNHCR for providing education in Morocco. The proportion of higher education students in the refugee population in Morocco is significant, since they represent about 17 per cent of the refugees between the ages of 18 and 59. These are mainly students from Yemen, Sudan and the Central African Republic who have come to Morocco to study as part of a Moroccan Agency for International Cooperation programme and have become refugees as a result of conflicts in their countries of origin. Access to employment for students is difficult for legal reasons. Many of them have residence cards issued for “education purposes” that prohibit them from working legally in Morocco. For procedural reasons, it is currently impossible to change their type of residence card before the expiry date (from “education purposes” to “work purposes”) to obtain a work permit. UNHCR is negotiating with the GoM changes to the administrative framework to facilitate their employability. This is a key advocacy element that needs to be further developed to facilitate the transition from university to the labour market. Some students are also enrolled in courses and fields of activity that are closed to foreigners, because hiring is restricted to Moroccan nationals only. A change in educational and career course in such cases is a real challenge in terms of local integration.

Supporting the enrolment of children in private and not-for-profit nurseries is an example of best practice as it eases their subsequent transition to state primary school. In addition, parents of children attending nursery –

⁴⁶ Equivalent to USD 145,400 in 2016, and USD 259,600 in 2018.

⁴⁷ Analysis carried out only for one month during 2018 in the cities of Casablanca, Rabat, Oujda, Fes, Tangier and Marrakesh.

⁴⁸ Action Urgence and AMPF biannual reports.

especially mothers – can enjoy more professional and social integration opportunities. Once relieved of the burden of childcare, they can take a course, engage in an IGA, or secure paid employment in the formal or informal sector.

One of the flagship achievements of the NSIA has been to open up access to the state education system to children of migrants and refugees, irrespective of their (or their parents') legal status. This provision, under which all children are entitled to enrol in school, was made in a ministerial circular to guarantee access to education for migrants and refugees throughout Morocco⁴⁹. Although local problems do occasionally arise, these are quickly resolved when UNHCR intervenes through its partner organizations or the network of community workers. The main barrier to higher enrolment rates is the inflexibility of the enrolment process. Parents can only enrol their children during a brief window at the start of the school year. New arrivals cannot therefore enrol until the next window opens. Some refugee families live nomadic lifestyles (Syrian Doms) or move frequently between cities. This can cause additional difficulties with enrolling children in school and ensuring they receive a stable education.

UNHCR faces several other challenges with education in Morocco. The first is to delay early drop-out by retaining children in school. The secondary enrolment ratio rose from 12 per cent in 2016 to 28.2 per cent in 2018. This figure is higher than the global secondary enrolment ratio among migrant children (23 per cent in 2017), but well below the ratio for Moroccan children as a whole (77.1 per cent). There is also a clear gender dimension to retention, with enrolment among girls falling as they progress through the levels of the education system. Girls from sub-Saharan Africa typically stay in school longer than their Arabic-speaking counterparts. Early drop-out is particularly prevalent among girls from Syrian Dom families, which tend to send the girls out to beg and take them out of school at the end of the primary cycle for early marriage⁵⁰.

Second, integrating children into school generally proves difficult if they are older than the primary enrolment age when they arrive in Morocco. These children, who have often missed one or more years of education while on the move, have attainment gaps and struggle to fit in at school. They are normally placed in classes with younger pupils and tend to drop out soon after. Since Morocco is a bilingual country, language learning poses an additional problem. Most refugees from sub-Saharan Africa cannot speak Arabic, while Arabic speakers cannot speak French.

Stemming from the previous two challenges, the third could be construed as an aim: to establish linkages between non-formal learning programmes and vocational training and apprenticeships in particular, so that children who have dropped out of school can learn a trade. Only 26 child refugees were enrolled in non-formal courses in 2018, at a time when the number of children dropping out of school was rising.

4.6 Durable Solutions and the GCR

Favourable local conditions (despite the persistence of legal, social and cultural barriers), have led UNHCR to promote local integration of refugees in Morocco as the main durable solution. However, despite sustained effort, UNHCR indicators show modest progress in terms of the economic integration of refugees. Similarly, the limited number of resettlement places highlights the overall difficulties in building an effective approach to durable solutions.

⁴⁹ The Ministry of National Education (MEN) published a framework memorandum in 2018, supplementing ministerial circulars No. 2-4676 of 11 October 2012 and No. 13-487 of 9 October 2013.

⁵⁰ Interviews with IPs.

In terms of integration, not holding a residence permit is a legal obstacle for many Syrian refugees, while sub-Saharan communities suffer more from cultural and social barriers that hinder their access to the labour market as well as their local integration.

The strategy used by UNHCR to support the creation of IGAs is appropriate and relatively effective, particularly when compared with strategies for employability. However, its effect on living conditions appears to be limited, essentially because the low amount of initial capital hampers efforts to obtain a level of income that is sufficient to reinvest in the business and improve profit margins, confining refugees to a subsistence economy.

Refugees' access to National Mutual Aid and Office of Vocational Training and Job Promotion (known by its French acronym "OFPPT") vocational training is an important achievement, despite the small number of available training courses that fit with refugee demands and profiles. The transition from vocational training to employment is also undermined by administrative and social barriers.

4.6.1 Resettlement

Worldwide, resettlement is a rare procedure: less than 1 per cent of refugees globally benefit from it. In Morocco, resettlement is therefore reserved for the most vulnerable refugee profiles, insofar as they can enter a programme in a third country. In general, the proportion of refugees in Morocco who are resettled to a third country is higher (1.5 per cent) than the proportion of resettled refugees worldwide (0.3 per cent)⁵¹. UNHCR is dependent on agreements with third countries, and there are very few places; in this context of scarcity, a rigorous assessment of vulnerability criteria is essential. In Morocco, the main categories of vulnerable persons eligible for resettlement procedures are women at risk, UASC and LGBTI people. Canada and the USA are the main countries of destination for resettled refugees from Morocco.

The main challenge regarding resettlement faced by UNHCR Morocco is the difficulty of accessing resettlement programmes for Arabic-speaking refugees, including Syrian refugees, even for highly vulnerable cases, due to the international political context⁵². Currently, the beneficiaries of resettlement procedures are mainly nationals of sub-Saharan countries. A second challenge is that refugees have a poor understanding of the standards, criteria and conditions that govern the resettlement procedure as applied by UNHCR, especially its limitations and constraints. The difficulties encountered by refugees in their daily lives and the inability to imagine satisfactory local integration mean that most want to leave the country and consider resettlement as the best legal option. As a result, resettlement is charged with a strong symbolic feeling of hope that generates frustration when it is not achieved. This sense of frustration is acute and generalized, since refugees generally consider themselves to be in a highly vulnerable situation in Morocco. Frustration results in a critical attitude towards UNHCR on how the procedure is followed. Refugees complain about the way in which resettlement criteria are applied, particularly for the benefit of LGBTI people, some of whom are accused of falsely benefiting from the system⁵³.

4.6.2 Voluntary Repatriation

Despite the importance that UNHCR places on voluntary repatriation, the national contexts in countries of origin and the reasons for which refugees came to Morocco mean that voluntary repatriation was an extremely rare

⁵¹ UNHCR Statistical report; data for 2018.

⁵² In 2017, 21 nationals from Syria were resettled; none were resettled in 2018 or 2019.

⁵³ FGDs, interviews with community workers and social workers.

occurrence between 2016–2019, with just three repatriations to Côte d'Ivoire (two in 2016 and one in 2018). Overall, the voluntary repatriation procedure is seen by refugees as too unattractive to be considered, never mind accepted, despite their unsatisfactory level of integration they otherwise express⁵⁴.

4.6.3 Favourable Factors to Local Integration of Refugees in Morocco

Several factors related to the local context clearly justify the option chosen by UNHCR to prioritize local integration as a durable solution in Morocco. The number of refugees is objectively low compared with the local population: there are 6,734 refugees, including 4,237 aged 18–59, within a Moroccan population estimated at 35 million inhabitants⁵⁵. Refugees in Morocco do not live in camps but in urban settings, and they are now spread over 50 cities. As a result, their integration into the local labour market, and more broadly into Moroccan society, does not represent additional competition in the Moroccan labour market, as may be the case in other countries.

At the political level, the NSIA⁵⁶ is part of a strategic vision to reinforce political openness in Morocco and economic development in Africa as a whole, marked by the country's return to the African Union and its desire to join the Economic Community of West African States (ECOWAS). As a result, favourable political and economic opportunities have been created for Moroccan companies wishing to invest in Africa. This political will for integration has also resulted in significant progress in the legal framework facilitating the entry of legal foreign residents (migrants and refugees) in Morocco into the national labour market:

- Refugees holding a refugee card issued by the BRA are exempt from the Agency for the Promotion of Employment and Skills (known by its French acronym “ANAPEC”) procedure, which aims to prove that there are no Moroccan national candidates matching the profile sought by a company; to date, this has considerably limited the employability of foreign candidates in Morocco.
- Foreign residents are eligible for self-employment status (Law 114-13) on the same basis as Moroccan citizens, provided they are legally established with a valid residence permit and have tax residence in Morocco (article 23 of the General Tax Code).
- Law 112-2 facilitates the participation of foreigners in cooperatives under the same conditions and with the same rights and obligations as Moroccans.

4.6.4 Major Barriers to Local Integration of Refugees

Despite the progress described earlier and the efforts made by UNHCR, there are legal, social and cultural difficulties and barriers to local integration of refugees. A significant proportion of refugees do not have a work or residence permit and thus do not benefit from the legal and regulatory advantages mentioned earlier⁵⁷.

Although refugees holding a BRA card are exempt from the ANAPEC procedure, they remain subject to the “contrat de travail d'étranger” (CTE) procedure, and their status is therefore not aligned with that of foreigners who

⁵⁴ FGDs, interviews with UNHCR Morocco staff.

⁵⁵ UNHCR figures 2019.

⁵⁶ The vision of the national strategy is to integrate the legal migrant populations, including refugees. One of its 11 programmes is specifically dedicated to employment and has three related specific objectives (12, 13, 14).

⁵⁷ UNHCR estimates that they represent over 60 per cent of the total refugee population. In the absence of a valid residence permit, employment and IGAs are restricted to the informal sector. The lack of proper work and residence permits particularly affects Syrians, but also affects Yemeni and Central African nationals who arrived in Morocco as students and hold a residence card for “educational purposes”, and LGBTI people who are not referred to the BRA.

benefit from more favourable conditions (nationals of countries with bilateral agreements: Algeria, Tunisia and Senegal). In practice, and despite the efforts made by the Ministry of Labour to set up an electronic procedure and to open counters, the CTE is still perceived by the private sector as a bureaucratic barrier to hiring a refugee.

Refugees, and mainly nationals from sub-Saharan countries, regularly report feelings of discrimination during recruitment, in the workplace, or even when developing IGAs in sectors that are not part of “intra-community” trade among compatriots. Many IGA beneficiaries report difficulties in finding suppliers or national customers with whom to establish long-term commercial relations.

Existing barriers mean that refugees, when they succeed, tend to integrate mostly into the informal economy, in a country where this represents more than 20 per cent of GDP (outside the primary sector) and more than 41 per cent of the country’s labour force⁵⁸. Moreover, the study carried out by the IUR shows that only a small number are formally hired into paid employment, and that 99 per cent of refugees work in the informal sector and have an income of less than 3,000 MAD⁵⁹.

Insufficient livelihood opportunities for refugees leads to difficult living conditions⁶⁰ and generates high levels of dependence on UNHCR social care. This results in feelings of discomfort and frustration, sometimes amplified by a feeling among refugees of social inferiority to those in their country of origin who have better working and living conditions⁶¹. It is not insignificant that psychiatric causes are the second most common reason for medical consultations among refugees in 2018⁶².

The daily tension between extremely precarious living conditions, feelings of inferiority and low prospects of better living standards is a major cognitive obstacle to refugee integration. This is a key cause of frustration, demotivation and despair, especially in a context that requires personal abilities and conviction if an individual is to engage in a proactive approach to overcoming the inherent difficulties of integration. In fact, FGDs confirmed that a significant proportion of refugees, and a large majority of sub-Saharan nationals, aspire to leave Morocco either by resettlement or by other means.

Other obstacles include some refugees not knowing where to find job offers (e.g. ANAPEC, social networks) or not being familiar with formal ways of recruitment (CV, cover letter); for these cases, AMAPPE soft skills trainings are extremely relevant.

4.6.5 Income-Generating Activities, Development and Entrepreneurship

The development of IGAs has been the foundation of the partnership between UNHCR and AMAPPE since 2007, with the objective of enabling refugees to access financial resources as an alternative to social care, and to break down the barriers that limit employability. For the implementation of their IGA, refugees receive in-kind support of up to 15,000 MAD⁶³, with the possibility of combining several grants if it is a multi-partner activity. The amount of initial capital remains low in relation to living standards in Morocco, and this limits the potential growth of the project. In fact, IGAs tend to be confined to traditional small business (e.g. community trade of African products,

⁵⁸ Confederation of Industries of Morocco (CGEM) 2018 report.

⁵⁹ Equivalent to USD 311

⁶⁰ IUR survey, FGDs.

⁶¹ FGD and interviews with implementing partners.

⁶² AMPF statistics show that 34 per cent of all specialized care consultations in 2018 were due to psychiatric needs.

⁶³ Equivalent to USD 1,558

dental prostheses, groceries for Arabic-speaking people) despite efforts made by UNHCR to identify other promising sectors.

The programme with AMAPPE supported the creation of an average of 127 IGAs per year between 2016 and 2018, funding projects for 357 refugees over three years, with an average conversion rate from feasibility study to IGA of 75 per cent, which reflects a good level of effectiveness. The rate of achievement of the initial three-year target is 76 per cent for funded IGAs and 101 per cent for funded refugees (some activities involve several refugees)⁶⁴.

The programme also has good geographical coverage; the three areas with AMAPPE officer presence represent 59 per cent of the IGAs created in 2018, but it is interesting to note that Rabat's share has dropped significantly since 2016, when it represented 44 per cent of IGAs created. The 2018 results in Casablanca-Settat (17 per cent), Fez-Meknes (18 per cent), Marrakesh-Safi (3 per cent) and Souss-Massa (3 per cent) show the efforts that have been made to offer solutions in provincial cities, despite the distances and logistical difficulties involved⁶⁵.

The IGA programme overall benefits more Arabic-speaking men than women and sub-Saharan Africans. Over three years, 89 per cent of programme beneficiaries were male and 83 per cent were Arabic speakers. These figures show that making the programme accessible to the most vulnerable groups, particularly Arabic-speaking women and nationals of sub-Saharan countries, is a major challenge⁶⁶.

Over the period 2016–2018, beneficiaries who are provided with cash assistance for basic needs represent 26–30 per cent of IGA beneficiaries. The rate of IGA beneficiaries who have become independent of the cash assistance scheme is a good indicator for measuring the impact. Over three years, the success rate was 54 per cent, which seems a promising indicator, but this deserves further analysis, as presented in Table 2, below.

Table 2: Cases transitioning from financial assistance for basic needs to successful IGA projects

	2016	2017	2018
Number of refugees receiving cash assistance for basic needs and receiving IGA assistance	39	33	31
Refugees receiving assistance who became beneficiaries of IGA / total IGA beneficiaries	28%	30%	26%
Number of refugees who became independent of financial assistance for more than one year through the IGA	21	18	-
IGA beneficiaries who became independent of financial assistance	54%	54%	-

Source: UNHCR data

⁶⁴ See Annex 1 – IGA Key Indicators – Table I.

⁶⁵ See Annex 1 – IGA Key Indicators – Table II.

⁶⁶ See Annex 1 – IGA Key Indicators – Table III.

The evaluation carried out by the Government of Morocco in 2016 made it possible to assess the sustainability of the IGAs developed since the beginning of the partnership between UNHCR and AMAPPE⁶⁷. According to AMAPPE data, 47 of the 101 IGAs created in 2016 were still in operation in 2017, which represents a sustainability rate of 46 per cent one year later.

Measurement of the effect of IGAs on standards of living must take into account the initial investment, which averages 15,000 MAD per refugee, a relatively small amount for an IGA compared with the country's overall economic development (especially in the cities) and, in particular, the cost of living. UNHCR and AMAPPE do not have sufficiently reliable information to measure changes in income and standard of living that are caused by the development of an IGA. The data collected from FGDs are in line with those collected by the IUR survey.

Despite some success stories highlighted by AMAPPE and UNHCR, the majority of beneficiaries report making small profits from IGAs, which do not allow them to reinvest in their business or improve their activities (e.g. work tools, maintenance, etc.)⁶⁸. While IGAs allow beneficiaries to temporarily leave the dependency of cash assistance, most remain trapped in a subsistence economy, living with the risk of falling once again into vulnerability, for example because of poor health⁶⁹.

As part of the ecosystem of actors working on the integration of refugees, the partnership with ATIL (a microcredit institution based in Tangier), was under discussion at the time of the evaluation. This might be an opportunity to increase financial investment in IGAs, and thus increase opportunities for refugees to carry through their initiatives towards economic integration. Using Microcredit as a support for the growth of existing activities would avoid the risks of loan non-repayment. Such an approach could help improve the earnings of refugees who have proven to be more entrepreneurial and enable them to move out of a subsistence economy. Consolidated and successful IGAs can serve as examples and encouragement to other refugees.

4.6.6 Vocational Training, Professional Skills and Employability

While the partnership with AMAPPE initially only focused on the creation of IGAs, it was later gradually diversified. In 2013, the first vocational training for refugees took place and in 2016, actions to support employability started. The expansion of the scope of AMAPPE made it possible to develop a comprehensive portfolio of services aiming at economic integration, structured around and managed by a single partner.

The Programme d'Insertion Socio-économique des Réfugiés Urbains au Maroc (PISERUMA) offers refugees the opportunity to draw up a professional skills assessment, to access vocational training in public institutions (OFPPT and National Mutual Aid), and benefit from intermediation with the private sector to assist in their search for employment. Workshops to strengthen professional and soft skills are carried out by the EFE Foundation, and informal vocational training, computer and language courses are organized by FOO. However, the PISERUMA team seems small when overall needs are taken into consideration. One officer oversees vocational training and another is responsible for professional integration in private companies.

⁶⁷ "Of the 428 IGAs supported between 2007 and 2016, 142 were still active at the time of the evaluation (33%), 48 refugees had changed activities, 74 had definitively stopped or suspended their activity (17.2%), 128 had left for resettlement, had disappeared, died or had their files closed by UNHCR (29.9%), 36 were unavailable (8.4%)".

⁶⁸ FGDs, interviews with implementing partners.

⁶⁹ FGDs, interviews with implementing partners, MDCMREAM, private sector.

The number of professional skills assessments carried out by AMAPPE between 2016 and 2019 is relatively high, despite a difficult start in 2016 when 67 assessments were carried out. Since then, the number of assessments has been steadily increasing (107 in 2018 and 149 in 2019), which shows the existence of regular demand from refugees^{70,71}.

While the number of refugees receiving vocational training at National Mutual Aid and OFPPT increased at a constant rate between 2016 and 2019 (67 in 2016, 82 in 2017 and 118 in 2018), the effects of this activity are not obvious. Firstly, too few refugees enrolled in vocational training benefit from internships at the end of the course, due to administrative barriers. Secondly, and although this does not appear in AMAPPE indicators, the number of refugees who find jobs at the end of the vocational training is low. This is due to several factors:

- The training courses are not very diversified (especially for women), or sufficiently tailored to the experience and expectations of refugees, and they do not respond to the profiles and skills sought by companies.
- Once the training is finished, refugees are confronted by legal, social and cultural barriers that hinder their employability.

Programme indicators related to refugees' access to employment reflect existing barriers; only 45 refugees were recruited in 2017 and 47 in 2018. Refugees interviewed in FGDs, in particular sub-Saharan nationals, reported difficulties in the recruitment process and in their workplaces.

The PISERUMA programme with AMAPPE has gradually opened up avenues of integration for refugees. Key progress includes access to vocational training organized by the National Mutual Aid and OFPPT and, more recently, the programme financed by the European Union in partnership with Office for Cooperation and Development (known by its French acronym "ODCO") and ANAPEC on the creation of cooperatives and to facilitate the status of "entrepreneur" for refugees starting an IGA. It is the involvement of public bodies in the PISERUMA programme that made it possible to open up access to national vocational training.

This is a key element of the UNHCR advocacy strategy, which aims to reinforce mutual trust with public institutions and to achieve and demonstrate concrete results in the local integration of refugees. Constructive dialogue with the GoM and fruitful relationships with relevant public institutions encourage a better understanding of the specific needs and challenges of refugee integration, especially in a context of mixed migration. As a result, the actions of UNHCR have helped to promote legal and administrative changes, as described above, with the exemption from the ANAPEC procedure of refugees with a BRA card being especially valuable.

4.6.7 The Private Sector

Following on from the World Humanitarian Summit, the Global Compact on Refugees highlighted the importance of involving the private sector, beyond its traditional role as a donor, in supporting the integration of refugees. UNHCR Morocco envisages the private sector being involved as a strategic actor for refugee integration and, in coordination with the UNHCR MENA Unit for Private Sector Partnerships, produced the "PSP in Morocco Report" which

⁷⁰ Although it does not seem to be systematically used by AMAPPE, the professional skills assessment is a tool that is well adapted to situations of sudden professional disruption, and to forced migration or exile. In these situations, refugees need to redefine their professional perspectives and find new occupational pathways in a completely different context and in a labour market that has many barriers. A professional skills assessment is a participatory and interactive exercise aimed at developing a new professional development plan, or even a new direction in life, jointly with the refugee.

⁷¹ See Annex 1 – IGA Key Indicators – Table V.

explores the potential of the Moroccan economy in terms of fundraising. To this end, UNHCR Morocco introduced a media communication strategy, which resulted in a partnership agreement being signed with the public radio and television channel 2M to raise awareness in Moroccan society of asylum- and refugee-related topics and of the UNHCR mission in the country.

A first agreement was also signed with the Confederation of Industries of Morocco (known by its French acronym “CGEM”) and a second one is under way with the small business union (General Union of Companies and Professions, known by its French acronym “UGEP”). The agreement with CGEM has already led to awareness-raising workshops with affiliated companies, as well as a specific partnership with the National Federation of Poultry Industries (known by its French acronym “FISA”) to enable refugees to benefit from training, internships and professional opportunities in this sector. The UNHCR strategy with the private sector is quite recent and there are no concrete results yet in terms of employment; FISA can be seen as the first sectorial federation being involved in refugee integration and can be used as an example to raise awareness among other sectors or companies. Now, the challenge for UNHCR and AMAPPE is to operationalize and consolidate the potential of these partnerships effectively over the long term.

The involvement of the private sector represents both an opportunity and a challenge for UNHCR Morocco to create effective opportunities for the economic integration of refugees. It calls for a paradigm shift, no longer thinking exclusively in terms of relations with the public administration, but rather of building an ecosystem of actors that includes civil society and the private sector. The underlying assumption is that the roles held by these diverse actors complement each other, offering the best guarantee of local integration for refugees. To this end, it is important to view the private sector not only as a donor, but also as a partner with whom multidimensional activities can be developed depending on the requirements and expectations of each individual company.

4.6.8 Development Actors

Although a mapping of initiatives and development programmes has not been carried out, the European Union (through several budget support programmes⁷²), a number of bilateral cooperation agencies (in particular, GIZ and ENABEL) and the World Bank Group⁷³ are supporting national reforms and policies with potential opportunities to mainstream refugee protection and assistance. In a context where economic integration programmes and social care services are conditioned by limited means, CSOs are underfunded and budgets targeting refugee needs are scarce, leveraging development resources might be an additional mechanism to diversify the funding of the CO. In the current national conditions, there is little room for manoeuvre for the transfer of service provision from UNHCR Morocco to other actors, although there are some avenues which could be explored.

4.7 Coordination

The current coordination mechanisms at central level are gradually helping to open up protection spaces within different governmental bodies as well as policies and generating synergies among actors. At local level, implementation of the NSIA is still very weak and, for the moment, there are few regional and municipal mechanisms to coordinate a multisector and multi-partner response to protection. “Regionalizing” the asylum policy, and especially

⁷² Social protection, Migration, Health.

⁷³ Under the recently approved country partnership framework 2019–2024; see CPF Objective 7. Strengthen Social Protection for the Poor and Vulnerable.

putting protection and integration initiatives into place, is one of the major challenges to bring coordination achievements made at central level down to local level.

UNHCR plays a role in all significant coordination mechanisms concerning asylum policy and refugee protection with four major groups of stakeholders (the NSIA led by MDCMREAM, the United Nations system, implementing partners and CSOs). The involvement of UNHCR in formal coordination mechanisms ensures that asylum and refugee protection is a cross-cutting topic addressed by state institutions. At the United Nations level, thematic groups are the main tool for coordinating cross-cutting issues and integrating them into the implementation of the United Nations Development Assistance Framework (UNDAF). In addition to formal coordination mechanisms, UNHCR regularly interacts with other CSOs, in particular refugee associations, to broaden the communication channels with PoC and to plan joint activities.

The integration of asylum (and migration) into the decentralization (regionalization) process, which gives more governance, capacity and autonomy to regions and municipalities, is a priority for MDCMREAM and is part of ongoing technical discussions with UNHCR, IOM and other international partners. Regionalization, as a complex state administrative reform, is envisaged for the long term and confers new powers on regions (“Conseils régionaux”, Provinces, “Préfectures”) and municipalities (“Communes”). Under the existing legal framework, asylum is not among the new areas of competence for local authorities, but the laws mention social care⁷⁴ and the creation of social centres and shelters⁷⁵ as part of shared jurisdiction between regions, municipalities and central government. On a broad interpretation of the laws, these provisions may open up a legal and political space for reflection on the roles of local authorities in providing assistance to populations in need, including refugees.

Until now, very few initiatives have been put in place to integrate asylum (and migration) into the political agendas of regions and municipalities; these have taken place in the Oriental region and the city of Oujda, as a key site of inbound mixed migration flows to Morocco. Local authorities generally perceive asylum as a national policy and as a sensitive issue beyond their jurisdiction and capabilities.

Despite being a CSO-led initiative, the PWGs are the subject of ongoing institutional discussions on how to integrate asylum into local political agendas. They are globally perceived as an effective mechanism to provide PoC with access to asylum and protection services, insofar as CSOs are able to work with difficult-to-reach populations who tend to avoid being in contact with formal public services. The PWGs are being considered by the public administration as a potential partner for the implementation of the NSIA at local level, but their associative nature and lack of legal status are factors that make it difficult to find a common ground.

4.8 The UNHCR Mandate and the GCM in Morocco

The engagement and proactivity of the GoM in producing national action plans for both the GCM and GCR is an excellent opportunity to keep asylum and refugee protection on the political agenda. At a time when national and regional migration dominates political, social and media debates, UNHCR support for the drafting of the GCR national action plan can play a significant role in ensuring specific visibility for asylum and in promoting the adoption of new national initiatives on local integration of refugees.

⁷⁴ Article 91, Law 111-14.

⁷⁵ Article 87, Law 113-14.

The implementation and monitoring of the NSIA and related migration initiatives are led by MDCMREAM, with involvement from many other departments (e.g. CNDH) and technical support from IOM as well as other international organizations and donors (e.g. the European Union, United Nations Trust Fund for Human Security (UNTFHS)). The close working relationship between UNHCR and MDCMREAM, and particularly the support provided by UNHCR resident technical assistance, allows UNHCR to be fully involved in all institutional discussions about the migration policy and to exploit the synergies between migration and asylum, particularly between the GCM and the GCR.

With regard to the GCM and GCR, the UNHCR approach has contributed to the decision by MDCMREAM to draft a specific GCR national action plan, as a complement to the GCM national action plan, positioning Morocco as one of the leading countries in translating international guidelines into measures adapted to the national context

UNHCR resident technical assistance is currently participating in the development of both the GCM national action plan (led by IOM) and the GCR national action plan. This is an exceptional opportunity to ensure coherence and complementarity between the two national frameworks. Teams from UNHCR and IOM are working together to support MDCMREAM in drafting both action plans. This exercise helps to keep asylum and protection visible at key ministerial levels in a political and social context marked by intense migratory flows at a time when the national implications of the GCM and GCR will be defined.

5 Conclusions

5.1 Support to the NSIA

How effective has UNHCR been in supporting the NSIA, particularly access to asylum, and what are the main challenges and opportunities?

Access to asylum, freedom of movement, adherence to the principle of non-refoulement and legal protection of PoC are, in general terms, guaranteed on Moroccan territory, despite the difficulty of identifying asylum-seekers in a mixed migration context. Formal mechanisms make it possible for UNHCR and partners to intervene effectively in the event of infringements of a refugee's individual rights. The fulfilment of the UNHCR mission will rely on changes in national conditions that currently impose some limits on ensuring a complete protection space (e.g. asylum law, border areas, recognition of Syrians, LGBTIs, UASC).

UNHCR Morocco has been effective in building capacity among a large number of senior and technical officials from various state institutions at central level and in CSOs, as envisaged in the NSIA. These actions have been useful in consolidating and establishing some "building blocks" for a national asylum system, although the lack of a national asylum law and the interim status of the interministerial commission weaken the process of building the national asylum system. The transfer of responsibilities from UNHCR to the GoM ("transitory period") is requiring a longer time frame than originally envisaged.

UNHCR Morocco has provided effective support for the implementation of key NSIA programmes through the provision of technical support to the process of drafting the law on asylum⁷⁶, the provision of social services⁷⁷, policy dialogue, participation in NSIA programme committees or facilitating the involvement of MDCMREAM in PWGs and outreach missions, setting up several MoU with national partners⁷⁸, and in the adoption of the GCR⁷⁹. All these efforts have helped to reinforce protection spaces and create opportunities for the local integration of refugees, in line with the NSIA vision ("ensure a better integration of migrants...").

In the face of uncertainties surrounding the adoption of the asylum law, the current joint RSD process allows the GoM to grant refugee status through the BRA to asylum-seekers and hence have access to rights and services and, in parallel, allows UNHCR to confer assistance on all refugees without distinction.

Driving Factors in Improving Refugee Access to Asylum

The comprehensive, collaborative and diplomatic approach adopted by UNHCR, together with state institutions, has generated mutual trust (particularly with MDCMREAM, other ministries and the security forces) and consolidated the fulfilment of its mandate in the country. GoM initiatives on asylum, good institutional relations and sustained UNHCR support and programmatic efforts have decisively contributed to creating a minimum framework

⁷⁶ SNIA Programme 10.

⁷⁷ SNIA Programmes 1, 2, 3, 5, 6, 7.

⁷⁸ SNIA Programme 11.

⁷⁹ SNIA Programme 9.

for access to asylum and protection spaces that, despite certain gaps (e.g. Syrians and LGBTIs), ensures basic respect for refugee rights in a complex regional context.

Regional geopolitics and instability in some European and Maghreb countries, the presence of intense regional mixed migration flows, and Moroccan foreign policy in Africa have been major external contextual factors that have influenced the development of the national approach to asylum.

UNHCR has created a consistent network of partnerships including public administration, CSOs, United Nations agencies, the private sector and universities, in a national context in which its protection mandate is being partially but steadily implemented. As a whole, this network acts as a structured ecosystem of actors working around refugee protection issues, which has the potential to fill in many of the gaps that UNHCR alone cannot fill. In this ecosystem, which is well aligned with the UNHCR “whole of society approach”⁸⁰, each organization has a reasonably clear role and there are synergies between actors, although the level of involvement and effectiveness varies significantly between organizations. The majority of partners are adding value, with varying levels of intensity and despite fluctuations, to protection and assistance actions.

5.2 Protection and Assistance to PoC

To what extent has UNHCR advanced its target objectives for protection and assistance to PoC, and which key areas of the operation need to be strengthened?

The UNHCR Morocco response is in general well aligned with UNHCR’s Strategic Directions 2017–2021 and the GCR, clearly contributing to reinforce protection and assistance and promote refugee inclusion. The involvement of state institutions (MDCMREAM and sectoral departments), collaboration with CNDH, creation of PWGs and partnerships with CSOs, acting as a network of complementary actors, have been key factors in providing reasonable levels of protection and assistance from essential services (e.g. legal, health, education, emergency housing, etc.) in response to increasingly diverse and complex refugee needs. Access is now consistently available, but quality and durability are not, and gaps persist.

Barriers to PoC identification and the lack of sufficient specialized state social care services are hampering appropriate and comprehensive case management of highly vulnerable cases (e.g. SGBV, UASC, people with serious illnesses, disability). Besides, assistance to refugees relies heavily on UNHCR capacity to mobilize the network of national public and private partners, and on the means to support service provision technically and financially via partners. The current cash assistance set-up and the comprehensive response to refugees’ needs appear to be unsustainable and ongoing changes in the strategy of intervention need to be intensified⁸¹.

The response of UNHCR Morocco is in general well aligned with UNHCR’s Strategic Directions 2017–2021 and the GCR⁸² and is clearly contributing to reinforce protection and assistance and promote refugee inclusion; however, efforts need to be intensified to mainstream asylum and protection into national systems and programmes. Weaknesses in the national social care and protection system limit the scope of UNHCR programmes, put further pressure on UNHCR’s responsibilities and resources, and require increased technical, human and financial efforts.

⁸⁰ New York Declaration Commitments.

⁸¹ See Chapter 6 – Recommendations.

⁸² Protect, Respond, Include, Empower, Solve.

The sustained growth in the number of PoC arriving in Morocco and the diversity of countries of origin means that protection and assistance needs are increasing in volume and intensity. The tension between refugees' needs, the UNHCR mission and budget constraints may compromise the durability of its operations. Under these conditions, UNHCR and IPs have set up a model of assistance for PoC that is:

- affective in terms of identifying needs and reaching refugees countrywide;
- reducing some social, educational and health risks, without eliminating them (which generates frustration for refugees);
- insufficient to put in place effective approaches to empower refugees, due to a lack of specialized human resources and tools that would reinforce the link between cash for basic needs with IGA creation and the persistence of systemic barriers (e.g. legal documentation); and
- financially costly and at risk of becoming financially unsustainable.

Barriers to access, and difficulties in identifying, referring and assisting particularly vulnerable groups (Syrians, SGBV, UASC, LGBTI, people with long-term health conditions, psychiatric cases) represent operational challenges to the granting of proper protection in Morocco, resettlement being for the moment the only effective solution.

Concerning health, UNHCR has moved from an objective of enabling access to public health-care facilities to one of generalizing the achievements of PHC to hospitals, and of financing health costs (including hospital fees, medicines and diagnostic tests).

In education, UNHCR has moved from an objective of access to public education for refugee children to meeting the challenge of retaining the most vulnerable children (e.g. Syrian girls, newcomers, families on the move) in education and improving integration and academic performance.

5.3 Durable Solutions and the Global Compact for Refugees

To what extent can the GCR be used in the Moroccan context as a vehicle for promoting durable solutions for refugees?

The creation of the GCR national action plan, led by MDCMREAM and supported by UNHCR Morocco, is a window of opportunity for ensuring coherence between international guidance and national application, keeping the specific characteristics of refugees highly visible as part of NSIA priorities and public programmes. The secondment of a UNHCR resident technical adviser to MDCMREAM is a valuable way of continuing to advocate, advise and support national initiatives targeting local integration, especially in the creation of national action plans for both the GCR and GCM. In parallel, ongoing contacts and initiatives by MDCMREAM to reinforce links with the private sector may help to boost UNHCR Morocco efforts.

UNHCR Morocco is steadily reinforcing local integration actions with greater private sector involvement and is rightly emphasizing IGAs as the most successful mechanism yet for supporting economic integration of refugees. IGA success rates are encouraging, although there is still much room for improvement. Employability and vocational training action have had very modest results. Overall, economic integration, for both IGAs and jobs, is taking place in the informal sector due to the weight of the informal economy and administrative barriers for refugees.

The UNHCR Morocco approach on durable solutions is well aligned with the GCR (commitments regarding “self-reliance” and “enhancing durable solutions”) and is consistent with national strategies on asylum and economic and labour-market conditions. The limited options for resettlement and the low attractiveness of voluntary repatriation result in the adoption of a coherent and pragmatic local integration approach (which takes place in a favourable local context, despite the persistence of many legal, social and cultural barriers).

UNHCR has developed an appropriate and promising strategy to support the creation of IGAs, thus presenting an alternative to social care and dependence on UNHCR and to formal employment in the private sector (since employment opportunities for refugees are very scarce). Access to microcredits for IGAs, although at a very early stage, has been pertinently incorporated as part of the economic integration approach. Employability awareness-raising activities and mediation with the private sector have potential in the current socioeconomic situation, despite modest concrete results to date in terms of number of refugees formally (or informally) hired.

6 Recommendations

The list presented below includes priority recommendations (for more specific and programmatic recommendations see annexes⁸³).

1 National asylum system and joint RSD procedure: Continue supporting state institutions (ministries, CNDH, etc.) with secondment of staff, technical assistance, institutional capacity development and participation in regular NSIA coordination forums.

2 Outreach and access to asylum and registration services:

- Continue supporting capacity-building activities regarding asylum and protection of national partners (state institutions, CSOs). In particular, work more closely in the future with lawyers and judges to establish case law favourable to PoC, in the absence of a national legal framework.
- Support organizational development and joint strategic planning with IPs to consolidate the effectiveness, quality and sustainability of CSOs' role in responding to refugees' needs in the long term.
- Capitalize on the activity of the PWGs and reinforce the linkage between PWGs and local authorities and public services at local level.

3 Assistance and access to services:

- Health: Review the implementation of UNHCR primary health care provision of services and conceive a new approach, together with AMPF and the MoH, to reinforce access to and the capacities of PHCs in neighbourhoods where refugees are present in Rabat, Fes and Marrakesh (potentially including UNHCR technical assistance and capacity-building for the public health system).
- Education: Support Ministry of National Education national initiatives to tackle early drop-out of refugee children and reinforce linkages between school, non-formal education and vocational training (apprenticeships).
- Cash assistance: Strengthen the link between the targeted beneficiaries in the cash for basic needs programme with the creation of IGA opportunities and enhance the complementarity of services provided to these refugees to ensure they reach self-reliance while taking into consideration their vulnerabilities.

4 Approach to durable solutions:

- Explore synergies with development actors to integrate the refugee population into national systems and programmes that are aiming for better social protection, health coverage, employability and access to finances for vulnerable and underserved groups.

⁸³ Annex 2 – Specific Recommendations for Vulnerable Groups; Annex 5 – Suggested IGA Intervention Model; Annex 15 – Recommendations (full version).

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- Promote access among the refugee population to financial instruments (microcredits) for IGAs and refugees' entrepreneurial initiatives and introduce accompanying measures to ensure proper understanding and management of financial issues, opportunities and risks.
 - Develop an integrated approach containing three separate IGA access procedures, with differentiated entry criteria, procedures and financial support arrangements to better match provision to refugees' profiles.
 - Strengthen the employability component of the CO by expanding the AMAPPE team, and by establishing a permanent presence in Casablanca so that AMAPPE can deepen its partnership with CGEM and harness the full potential of the private sector in the economic capital city.
 - Strengthen resettlement arrangements for the most vulnerable refugees and continue to seek complementary pathways for accessing third countries through the issuance of humanitarian and study visas, family reunification and work programmes. Promote voluntary repatriation by making assistance more attractive, including setting up mechanisms to allow refugees to create IGAs in countries of origin under conditions similar to those existing in Morocco.

5 Gender approach: Review the design of the UNHCR Morocco Action Plan 2019 on AGD and reinforce its implementation through the introduction of "sector-tailored" operational measures in all programmes to contribute to the reduction of barriers and inequalities due to gender factors.

6 Apply the appropriate response to protection needs in a national context characterized by mixed migration and the transfer of responsibilities to the GoM:

- Consolidate joint technical working teams (MDCMREAM, other ministries, IOM, UNHCR, international agencies) and plan inclusive participatory exercises (including local authorities) to ensure national ownership during the development of national action plans for both the GCM and GCR.
- Strengthen operational links with MDCMREAM by creating an annual action plan and an operational coordination mechanism.
- Intensify efforts to define a common operational framework and protection standards, as well as clear and stable coordination mechanisms, between the public administration at central and local levels, CSOs and, in particular, PWGs.

Annexes

Annex 1 – IGA Key Indicators

Annex 2 – Specific Recommendations for Vulnerable Groups

Annex 3 – Assistance and Integration Model: Tensions, Balancing Acts and Prospects

Annex 4 – Note on the UNHCR Morocco Monitoring System

Annex 5 – Suggested IGA Intervention Model

Annex 6 – Trends in Refugee Settlement by City and Nationality 2016–2019

Annex 7 – Protection Working Groups (PWGs)

Annex 8 – Suggested Indicators for the Measurement of Economic Integration Actions

Annex 9 – Roles Played by UNHCR and its Level of Impact

Annex 10 – Evaluation Terms of Reference

Annex 11 – Evaluation Matrix

Annex 12 – Data Collection Tools

Annex 13 – Organizations Interviewed

Annex 14 – List of Consulted Documents

Annex 15 – Recommendations (Full Version)

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