**UNHCR**
United Nations High Commissioner for Refugees
Haut Commissariat des Nations Unies pour les réfugiés

# Evaluation of UNHCR's Emergency Response to the influx of Syrian Refugees into Turkey

January 2014-June 2015

Main Report

ES/2016/03

Commissioned by UNHCR Evaluation Service
Conducted by Universalia

**UNIVERSALIA**

UNHCR Evaluation Service

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# Acknowledgments

# Acronyms

| | |
|---|---|
| **3RP** | Regional Refugee and Resilience Plan |
| **AAP** | Accountability to Affected Populations |
| **AFAD** | Disaster and Emergency Management Authority (Turkey) |
| **AGD** | Age, Gender and Diversity |
| **AGDM** | Age Gender and Diversity Mainstreaming |
| **AI** | Amnesty International |
| **ASAM** | Association for Solidarity with Asylum Seekers and Migrants |
| **CBI** | Cash-Based Intervention |
| **CFS** | Child Friendly Space |
| **COP** | Country Operation Plan |
| **CRC** | Convention on the Rights of the Child |
| **CRI** | Core Relief Item (formerly NFI/Non-Food Item) |
| **CS** | Community Services |
| **DAFI** | Albert Einstein German Academic Refugee Initiative |
| **DGMM** | Directorate General of Migration Management |
| **DRC** | Danish Refugee Council |
| **ECE** | Early Childhood Education |
| **EU** | European Union |
| **FAO** | Food and Agriculture Organization |
| **FGD** | Focus Group Discussion |
| **FO** | Field Office |
| **FTS** | Financial Tracking System |
| **GS** | General Service |
| **HC/HCT** | Humanitarian Coordinator/Humanitarian Coordination Team |
| **HQ** | Headquarters |
| **HRDF** | Human Resources Development Foundation |
| **IBC** | International Blue Crescent Relief and Development Foundation |
| **ICT** | Information and Communication Technology |
| **ILO** | International Labour Organisation |

| | |
|---|---|
| **IMC** | International Medical Corps |
| **INEE** | International Norms for Education Emergencies |
| **INGO** | International Non-Governmental Organization |
| **IOM** | International Organization for Migrations |
| **IP/OP** | Implementing Partner/Operational Partner |
| **IşKUR** | Turkish Employment Agency |
| **LFIP** | Law on Foreigners and International Protection |
| **MENA** | Middle East and North Africa |
| **MHPSS** | Mental Health and Psycho-Social Services |
| **MoFSP** | Ministry of Family and Social Policies |
| **MoH** | Ministry of Health |
| **MONE** | Ministry of National Education |
| **NGO** | Non-Governmental Organization |
| **NNGO** | National Non-Governmental Organization |
| **NO** | National Officer |
| **OCHA** | Office for the Coordination of Humanitarian Affairs |
| **ODA** | Official Development Assistance |
| **OECD DAC** | Organisation for Economic Co-operation and Development - Development Assistance Committee |
| **OIOS** | Office of Internal Oversight Services |
| **OL** | Operating Level |
| **PDES** | Policy Development and Evaluation Service |
| **PDMM** | Provincial Directorate of Migration Management |
| **PDU** | Policy and Development Unit |
| **PoC** | Person of Concern |
| **PPR** | Partner Performance Report |
| **RC** | Resident Coordinator |
| **RI** | Relief International |
| **RRP** | Regional Response Plan |
| **RSD** | Refugee Status Determination |
| **SETA** | Sector Education Training Authority |
| **SGBV** | Sexual and Gender-Based Violence |
| **SRG** | Syria Response Group |

| | |
|---|---|
| **STL** | Support to Life (Turkish NGO) |
| **TEC** | Temporary Education Centres |
| **TOMER** | Turkish Teaching, Application and Research Centre |
| **TORs** | Terms of Reference |
| **TPR** | Temporary Protection Regulation |
| **TRC** | Turkish Red Crescent |
| **UMG** | Universalia Management Group |
| **UASM** | Unaccompanied and Separated Minors |
| **UN** | United Nations |
| **UNDP** | United Nations Development Programme |
| **UNFPA** | United Nations Population Fund |
| **UNHCR** | United Nations High Commissioner for Refugees |
| **UNICEF** | United Nations Children's Emergency Fund |
| **UNIDO** | United Nations Industrial Development Organization |
| **UNRC** | United Nations Resident Coordinator |
| **WASH** | Water, Sanitation and Hygiene |
| **WFP** | World Food Programme |
| **YOBIS** | Foreign Students' Management Information System |
| **YTB** | Presidency for Turks Abroad and Related Communities |

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# 1 Introduction and Context

## Introduction

The purpose of this evaluation is both learning and accountability. The evaluation focuses only on the Syrian caseload in Turkey during the period of 1 January 2014 to 30 June 2015. The evaluation does not consider UNHCR's assistance and protection of the approximately 250,000 non-Syrian refugees[1] in Turkey, nor the European movement, nor the cross-border activities into Syria under the Syrian Humanitarian Assistance Response Plan. Historical elements and perspectives prior to the Syrian emergency serve as a baseline to underline progress and difficulties encountered.

The objectives of this evaluation specifically include (a) assessment of the extent to which pre-determined objectives have been met, including reasons for success of failure, (b) identification of protection and assistance gaps for persons of concern to UNHCR, and (c) insights into UNHCR's strategic positioning within Turkey.  As set out in the Terms of Reference (**Appendix I**) and in the Matrix of Evaluation (**Appendix II**), the evaluation followed OECD/DAC evaluation criteria and questions: Coordination, Efficiency, Coverage, Appropriateness, Impact, Sustainability and Connectedness, as well as sector-specific evaluation questions on Protection, Education, Social Cohesion and Self-Reliance, and Programming. In order to reduce the body of the text and to draw out the more important aspects, after the draft report was submitted UNHCR's Policy Development and Evaluation Service (PDES) and the Evaluation Reference Group[2] requested that the final report be reorganised into the five main chapters found below.

The evaluation took place in four phases.  A first inception mission visited UNHCR HQs in Geneva from 14-16 December 2015. A second inception mission to Turkey from 8-12 February 2016 was immediately followed by a data collection phase[3] in several regions of Turkey from 15 February – 4 March 2016. The first debriefing to PDES and to UNHCR Turkey took place on 4 March 2016 in Ankara, followed by a second debriefing to UNHCR's MENA Bureau on 15 March 2016.  The fourth phase of data analysis and report drafting concluded with the submission of the draft evaluation report on 18 April 2016.

This report is structured as follows. It first introduces the reader to the unique country context – a **context that determines why and how UNHCR's programme in Turkey is unlike its programmes anywhere else in the world**.  The next section details the methodology and some of the challenges that the evaluation encountered, and then there are five substantive chapters: Strategic Positioning, Protection, Education, Social Cohesion, and Programming. In each chapter, there are findings referenced to the evaluation

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[1] The evaluation uses the term "refugee" throughout, and recognises that Syrians in Turkey are considered by the Government of Turkey to be Persons under Temporary Protection, as discussed later in this Context chapter

[2] The Reference Group consisted of UNHCR officials, and representatives from UNICEF, ICVA, Canada, EU and USA

[3] The absence of a gap between the second inception phase and the data collection phase was the result of logistical factors over which the evaluation team had no control

questions of the TORs, recommendations ensuing from the analysis, and a short concluding paragraph providing overall assessment of UNHCR's performance.   The findings and recommendations are consolidated at the end of the report.  Finally, nine appendices inform the reader about the sources of evidence used.

## Context

The donor community,[4] the World Bank[5] and the UN[6] all agree that Turkey is different from other refugee hosting countries in the region in at least two key respects.  First, as a G20 country and the world's 18th largest economy, Turkey is an upper-middle income country aspiring to join the European Union. Indeed, **Turkey sees itself more as a donor country than as an aid recipient country**, claiming in its 2013 Annual *Turkish Development Assistance Report* that it is "the top donor of humanitarian aid in the world".  While this might be an overstatement, since 2012 Turkey has been counted in the top 15 ODA donor countries by the OECD DAC,[7] and Turkey's officially reported humanitarian assistance contributions between 2011 and 2014 amounted to $4.5 billion.[8]While the Government's claims of having spent over $8 billion for Syrian refugees[9] are not publicly substantiated, the officially reported financing to the OECD DAC and extrapolations for 2015 make it **seem likely that the Government has spent at least $6.5 billion between 2011 and 2015,**[10] primarily on the management of 26 temporary accommodations centres (camps) hosting about 260,000 refugees as of the end of 2015, and additional expenditures through line ministries and local governments for out of camp populations. In any scenario, there is **no doubt that the Government of Turkey's support for Syrians far outweighs support provided by international donors.**

A second feature of the Turkish context is that **the Government is firmly in the lead on refugee issues**. Host country leadership is the ideal situation for refugees and for UNHCR, but in most cases host governments rely heavily on UNHCR financial and technical support.  In the case of Turkey, the extent of Government leadership is so complete that initially UNHCR was informed that UN and donor assistance was not needed.  UNHCR had (and still has) no direct role in refugee registration of Syrian refugees or access to registration data, and in the beginning UNHCR was not allowed access to the temporary accommodation centres established and managed by the Government's Disaster and Emergency Management Authority (AFAD) and the Turkish Red Crescent (TRC).  While UNHCR's assistance is now welcomed and access is largely assured (see detailed discussion in the report below), there is no doubt that **in Turkey, UNHCR is playing an unfamiliar role of supporting a strong and well-resourced Government, and is only able to act in specific confined spaces at the invitation of Government authorities.** As we shall see, this has wide-ranging implications for the kind of programming that UNHCR can do in Turkey, and for the skills mix needed in the UNHCR team.

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[4] Interviews, donor reports

[5]Turkey's Response to the Syria Crisis and the Road Ahead, World Bank report 102184, December 2015

[6] RRP6 and 3RP appeal documents

[7] OECD DAC data

[8]Global Humanitarian Assistance Report 2015; Development Initiatives

[9] For example, in the First stage needs assessment covering 2016-2018 for Syrians with temporary protection status in Turkey; Ministry of Development, March 2016

[10] Turkey reported US$ 1,8 billion in humanitarian assistance to the OECD DAC for 2014, GHA, op. cit., p. 38

## The context of the refugee population

There are three important characteristics of the Syrian refugee population in Turkey.  The first is that it has **grown rapidly to the point where it is now the largest refugee population in the world**.  Most of this is new arrivals from Syria directly or via Jordan and Lebanon, but we are now seeing significant natural population growth, with reportedly 159,000 new births since 2011.[11]  With reference to the graph below, note that this reflects the rate at which Syrians were registered in Turkey by the Government during the period of this evaluation, in particular through a major registration campaign in mid-late 2014:

*Figure 1.1       From Jan 2014 to June 2015, the number of Syrian refugees in Turkey tripled*
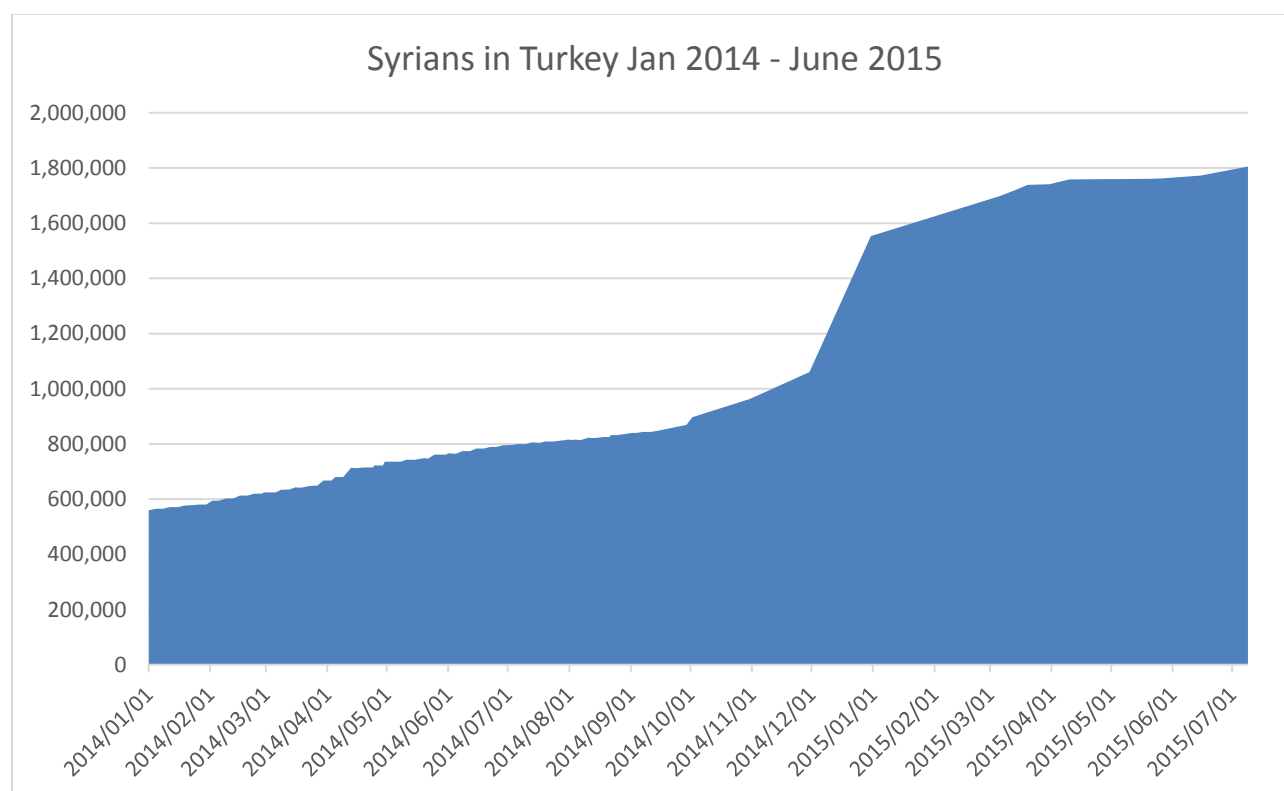


The second key characteristic of this population is that about **90% of the Syrian refugees are living outside camps** - beyond reach of the services that can be more efficiently provided in a controlled camp setting. This has profound implications for protection, social cohesion, economic opportunities, and sustainability.

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[11] Government of Turkey statement to the London Conference: February 2016

*Figure 1.2      Syrians living in camps represent about 10% of the total population[12]*
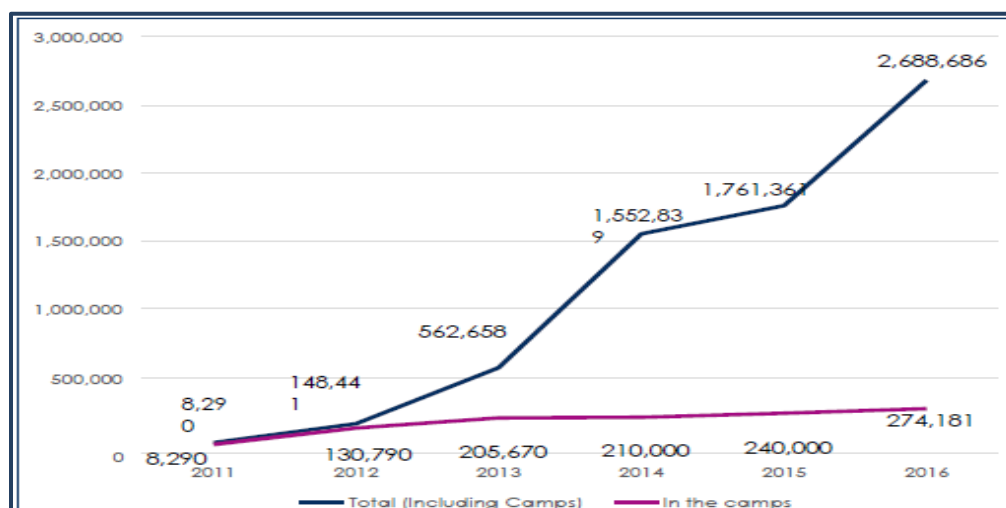


The third and final key characteristic is that Syrian refugees, whose movement was unrestricted prior to registration in 2013–2014, are **spread throughout all the municipalities of a very large country**.  Data provided by DGMM[13] shows that Syrian refugees are registered in every province, although 80% of the 2,748,000 registered Syrians (as of 1 March 2016) are in ten provinces.

*Figure 1.3      Number of Syrians under Temporary Protection by Province[14]*



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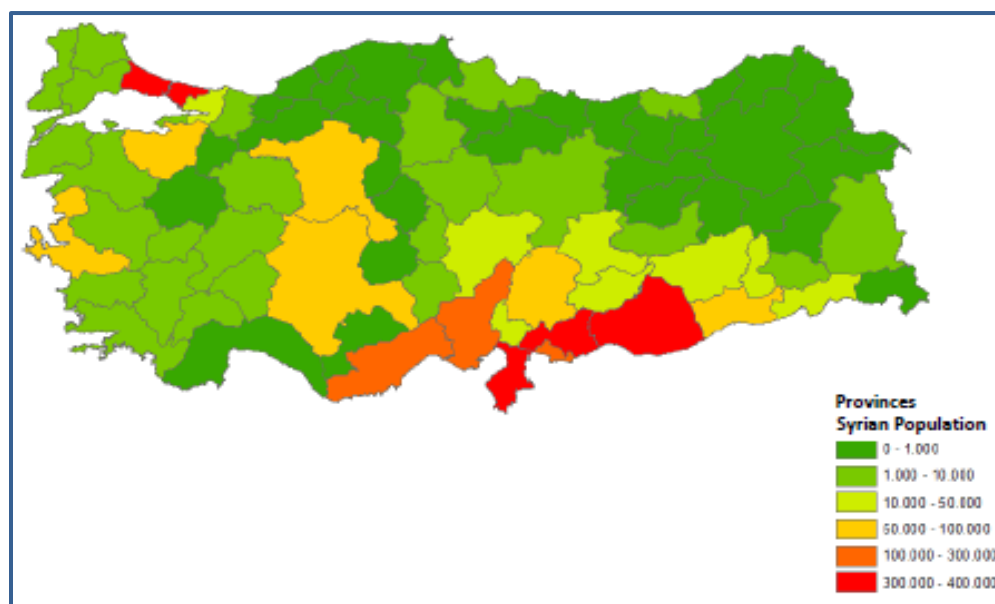
[12]First Stage Needs Assessment covering 2016-2018 period for Syrians with Temporary Protection Status in Turkey, Ministry of Development, March 2016

[13]DGMM website

[14]First Stage Needs Assessment, op. cit., p. 6

The combination of a Government-managed response, a huge number of refugees, and their wide geographic distribution requires UNHCR to work in entirely different ways. How UNHCR has learned to adapt to this very different context will be one of the underlying themes of this evaluation.

## The legislative context of refugees and asylum seekers in Turkey

Since the onset of the Syrian crisis in 2011, there has been **transformational change in both the responsible Turkish institutions, and in the legal framework governing Syrians in Turkey**. In 2011, UNHCR's primary relationship regarding refugee assistance was with the Turkish Red Crescent (TRC). With the influx of Syrians and the establishment of the camps along the border with Syria, the main counterpart relationship for assistance shifted to the Disaster and Emergency Management Authority(AFAD). Then, with the enactment of the new Law on Foreigners and International Protection, a new Turkish Government authority the Directorate General of Migration Management (DGMM) was created with responsibility for refugee registration and protection. And finally, in 2015, the Prime Minister of Turkey created the position of Chief Advisor on Immigration and Humanitarian Aid within the Prime Minister's Office. Each time a new institution is introduced into the system, the rest of the Government as well as external stakeholders including UNHCR must establish a new set of relationships, explain the history, adapt to new mandates, and modify coordination arrangements.

The legal context has evolved quickly over the same period. Initially, under the 2012 Directive on Reception and Accommodation of Syrian Arab Republic Nationals and Stateless Persons who reside in Syrian Arab Republic, who arrive to Turkish Borders in Mass Influx to Seek Asylum, **Syrian refugees were considered "guests" and essentially treated as visitors**. Within three years, two foundational pieces of legislation were passed, the Law on Foreigners and International Protection (LFIP) no. 6458 was passed on 4 April 2013 and entered into force in April 2014, and the Temporary Protection Regulation (TPR) of 22 October 2014. It is a considerable **testament to the political commitment of the Government of Turkey towards refugees, and to the consistent support of UNHCR, that these two pieces of progressive legislation were passed during an electoral period and while Turkey was experiencing a mass influx of refugees**. Technically, the Syrians in Turkey and who are the subject of this evaluation are not considered by Turkey to be refugees, but are defined as **persons under Temporary Protection**, a special status under Turkish law that provides to persons arriving in Turkey as a result of a mass influx most of the same economic and social rights as refugees, while not requiring individual refugee status determination or granting the formal rights of refugees or persons benefiting from conditional protection (the status accorded to the vast majority of non-Syrian asylum seekers in Turkey).Two key features of the TPR are that temporary protection status can be terminated by order of the Council of Ministers (hence its temporary character), and that persons applying for temporary protection status shall not be penalised for entering the country illegally.

Over the same time period, over 30 separate administrative circulars and directives were issued by the Government of Turkey governing refugee education, medical care, the labour market, and social assistance and services. The regulations also define groups with special needs, including unaccompanied and separated children, people with disabilities, elderly, pregnant, single parents, survivors of violence and torture, and survivors of SGBV. The net effect of these regulatory measures has been to reduce the ease of access by Syrians to Turkey (for example introducing a visa requirement in January 2015) and to progressively limit freedom of movement within Turkey, while at the same time opening up more and more access by Syrians to services and labour markets within their provinces of registration, to the point that **most Syrians who are residing within their province of registration now have rights to the same basic services and economic opportunities as Turkish nationals**, although their ability to access these services varies across regions and is often limited by lack of awareness and language difficulties.

## UNHCR's operating context in Turkey

Turkey is not a Delivering as One country for the United Nations system, there is no Humanitarian Coordinator, and the UN Country Team is led by a UN Resident Coordinator. Turkey has ratified the 1951 U.N. Convention on the Status of Refugees but maintained the geographic limitation. Importantly, Turkey is the only significant UNHCR operation which is not covered by a host country agreement – creating difficulties for the office and in particular for import clearances and duty-free status of purchases. At the beginning of 2011, on the eve of the Syrian crisis, UNHCR's Turkey operation had a total of 5 international staff nationwide, and was entirely focused on registration, refugee status determination and resettlement of a relatively small caseload of 17,000 non-Syrians. From there, the operation grew dramatically in programming and staffing (figures below combine Syrian and non-Syrian programmes).

*Figure 1.4    UNHCR's staff and expenditures increased substantially as the Syrian crisis evolved[15]*
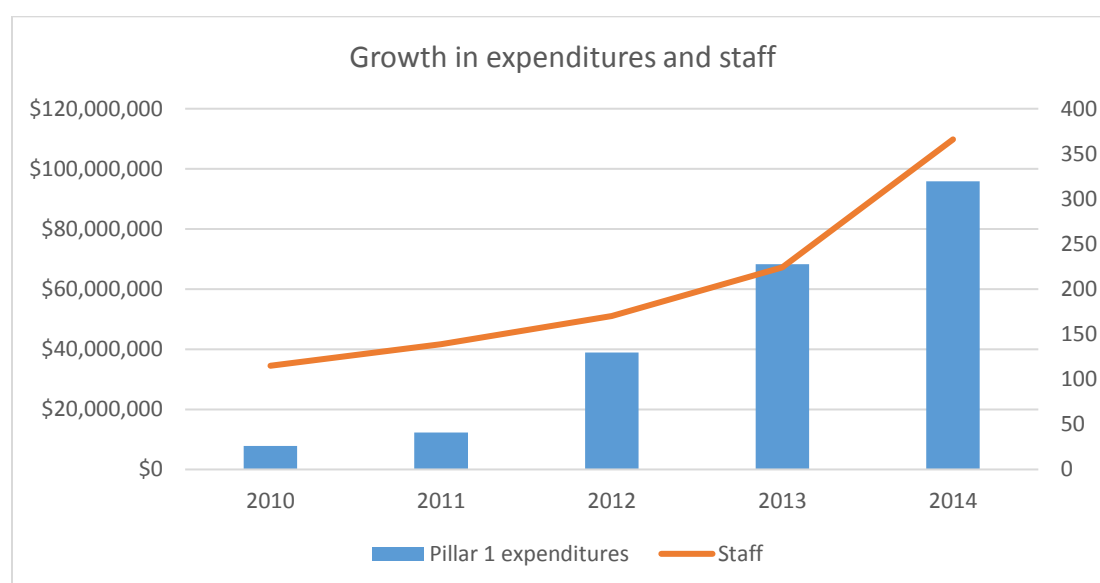


**Not only did the operation grow in size, but it grew in complexity** as the assistance and legal context for the Syrians introduced the new dimensions of camps, material assistance in the form of core relief items (CRIs), education services, cash/e-vouchers, support for a Government-managed registration system and initial support for livelihoods, none of which the UNHCR Turkey office was initially equipped for. At the same time, **the number of non-Syrian refugees has also grown dramatically**, placing huge pressures on UNHCR's pre-existing registration and refugee status determination machinery. And finally, in addition to these two rapidly-growing and rapidly-changing Syrian and non-Syrian operations, two entirely new dimensions of programming were added in 2014 and 2015: the addition of a **substantial cross-border operation** into Syria (under UN Security Council Resolutions 2165 (2014) and 2191 (2015)), and the **Special Mediterranean Initiative** (with its own appeal and programme starting in 2015).[16]

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[15] Source: UNHCR Global Reports

[16] As of late 2015 UNHCR's Turkey operation is covered by five different appeals: the 3RP for Syrians, the Iraq Situation appeal, the Special Mediterranean Initiative, the Supplementary Resettlement Appeal, and the Global Appeal– and to further add to the complexity the UNHCR office in Turkey is co-managed by two HQ Bureaux: Europe Bureau for the non-Syrians and for the Mediterranean movement, and MENA Bureau (based in Amman) for the Syrian, Iraqi and cross-border operations.

Although these other situations are beyond the scope of this evaluation, **they are still part of the complex operating environment of the UNHCR office in Turkey**, and they have a profound impact upon Turkey's relations with donors and UN agencies including UNHCR itself, where a different HQs Bureau is responsible for the European dimensions.  In particular, late in 2015 (and beyond the evaluation period) the European Union announced a **€3 billion programme of support for Syrian refugees in Turkey** that dwarfs all previous financial pledges and fundamentally changes the refugee assistance landscape going forward.

The final contextual point to note is that the sudden increase in global attention to Turkey (especially in 2015) has placed upon the operation an extraordinary burden of visit management, as senior UN and donor country officials have **intensified the level, frequency and expectations of their visits to Turkey** – to the point where the time spent on briefing and accompanying dignitaries limits senior management time available for actually handling the heavy and complex management tasks at hand.

*Table 1.1        From civil unrest to civil war, the Syrian refugee presence in Turkey has radically changed the humanitarian response of the Turkish government - and UNHCR's role and operations*

| | 2011– 2013 | 2014 – 2015 |
|---|---|---|
| **SITUATION** | (the demarcation between years is approximate to show contrast) | |
| Syria situation is seen as | Civil unrest | Civil war |
| Government response is | Responsive | Anticipatory |
| Government planning assumptions are | Short term, then return | Protracted |
| Presumed durable solution is | Voluntary return | Return and resettlement |
| Government stance is | Syrians are guests | Temporary Protection |
| Syrian border is | Open and loosely managed | More and more strictly managed |
| Legal regime for Syrians | Syrian received as "guests" | LFIP and TPR |
| Government coordination by | Deputy Prime Minister/AFAD | DGMM and Prime Minister's Office |
| Government management model is | Mostly in camps | Mostly out of camps |
| **UNHCR/DONOR ROLES** | | |
| Donor stance is | Disinterested | Preoccupied with European movements |
| Assistance mostly by | Government and NNGOs | Government, UN, INGOs, NNGOs |
| UNHCR role mainly as | Trusted external adviser | Strategic partner |
| UNHCR management model is | Centralised in Ankara | Shared with Gaziantep and Istanbul |
| UNHCR staff focused on | Non-Syrian RSD/resettlement | Building a new Syrian programme |
| Protection approach is | Case management and camps | Camps and Community-based |
| Assistance approach is | CRIs and in-kind | Conversion to cash and e-vouchers |
| Situation planning framework is | RRP (UNHCR managed) | RRP to 3RP (UNHCR and UNDP) |

|  | 2011– 2013 | 2014 – 2015 |
|---|---|---|
| **SYRIAN REFUGEES** |  |  |
| Syrians are | Mostly registered in camps | Registered nationwide |
| Syrian vulnerabilities are | Not captured | Captured by IPs and local authorities for CRI/cash targeting |
| Urban Syrians are surviving | On savings and relatives | On informal labour |
| Syrians access counselling | Only when in camps | Through community centres and IPs |
| Syrian refugee education | Mainly separate Arabic schools | Also integrating into Turkish schools |

*Figure 1.5    Timeline of the Syrian refugee crisis in Turkey*

First Gaziantep coordination meetings

ODMS recommendations on office restructuring

Head of Office Gaziantep arrives    Protection strategy drafted    Urban strategy drafted

**2014**    Jan         Mar         May         Jul         Sep         Nov         2015         Mar         May    **2015**

LFIP enters into force    Circular on beggars    TPR issued    Syrian visa introduced    Akcakale influx

Istanbul registration starts    Education circular 201/4/21 issued    Special Advisor to PM appointed

Kobane influx

Violent anti-Syrian demonstrations in Istanbul

# 2 Methodology

The evaluation has been guided by OECD-DAC Evaluation Quality Standards for Development Evaluation,[17] the UNEG Norms and Standards for Evaluation in the UN System,[18] as well as the Code of Conduct for Evaluation in the UN System.[19]The overall approach to the evaluation has been utilization-focused and followed a participatory and mixed-methods approach with the objectives of both assessing the performance of UNHCR's response and providing learning for key stakeholders to use for strategic decision-making and the design of future interventions.

In assessing performance, the evaluation considered inputs and outputs as well as processes throughout the design, planning and implementing stages of UNHCR's interventions. External factors were also considered as they particularly influenced observed results (i.e. the movement trends, the evolution of Government policies and initiatives, the activities of other actors, the level of funding received as compared to the needs posed by the emergency).

## 2.1    General approach

**The following approaches have characterised the evaluation:**

**Utilization-focused approach.** During the inception phase, in Geneva as in Turkey, the team worked closely with PDES and with the Reference Group to finalize the methodology and work plan. During the data collection phase, the team continued to engage with UNHCR Turkey and PDES to review progress at important points, above all to ensure that the team arrives at useful, feasible and actionable recommendations. This approach did not decrease the evaluation's impartiality and independence, as the evaluation team remained in control of the content of the evaluation report while ensuring the consideration of end user perspectives.

**Mixed-methods approach.** The purpose of a mixed-methods approach is to triangulate sources of information and perspectives -- drawing on quantitative and qualitative techniques in order to ensure a comprehensive, robust, and evidence-based understanding of the programme under evaluation, which in turn allows for the development of insightful findings, reliable conclusions, relevant lessons learned, and targeted recommendations.  Since the beginning of its evaluation, the evaluation team has used a range of quantitative and qualitative data collection and data analysis methods.  These included: (a) document review; (b) in-person key informant interviews; (c)an online survey; (d) field visits including observation and beneficiary dialogues (whenever possible and realistic); and (e) database and financial analysis.

**Participatory approach.** With the support of UNHCR, Universalia actively engaged with UNHCR senior managers (in Geneva as well as throughout Turkey), field staff, donors, partners and key government partners throughout the data collection phase. In all instances, on an individual or a group basis, the team

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[17]http://www.oecd.org/development/evaluation/qualitystandards.pdf

[18]http://www.uneval.org/document/detail/21 and http://www.uneval.org/document/detail/22

[19]http://www.uneval.org/document/detail/102 and http://www.unevaluation.org/document/detail/100

encouraged interlocutors to share their points of view and experience in confidence.  It is important to note that the evaluation team had very limited direct access to refugees, and was not able to gather methodologically sufficient data from the Syrians themselves.

**Gender focused approach.** The evaluation assessed the extent to which the development of policies and programmes in support of Syrian refugees integrated gender equality.

## 2.2    Data collection

### Document review

Cooperation from the UNHCR country team and other stakeholders has been outstanding in regard to document collection, all the more valuable since the field visits were taking place at the same time as basic documents were being provided and time was of the essence.  Documentation included internal notes and field reports, and enabled the evaluation team to draw hypotheses to guide the evaluation, as well as to triangulate information gathered through interviews, group discussions and field observation.

### Online Survey

After consultation and integration of comments and suggestions for revision from UNHCR, an online survey was sent to three categories of stakeholders: UNHCR Turkey current and past personnel; National/International NGOs; and UN agencies in Turkey.  A Turkish version of the Survey was developed and sent to a selected range of officials from DGMM, AFAD and other interested officials of other organizations partnering with UNHCR. UNHCR Ankara then briefed Turkish officials and partners on the rationale for the proposed survey.

The initial intention for the survey was to gather meaningful data from a broad spectrum of stakeholders *before* commencing the field mission in Turkey. Administering a survey (and document review) before data collection in the field saves precious time as the team can then use field time to focus on triangulating and validating hypotheses and preliminary findings. For logistical and technical reasons, this could not be done and much of the documentary and survey data was analysed after the field visits.

The survey was open for six weeks.  It yielded a disappointing response rate, although not altogether surprising given the operating environment of Turkey, where some relationships are very sensitive and all stakeholders are cautious in their observations. The response rates from UNHCR HQs, UNHCR Amman and from the Turkish stakeholders were insignificant.  The UNHCR staff and I/NGO responses were useful, in particular the narrative comments provided depth that complemented the key informant interviews. Results of the Survey are presented in **Appendix IV.**

## *Stakeholder Mapping and Interviews*

With the support of UNHCR Turkey, the evaluation team mapped the main stakeholders (see a summary in **Appendix III**). Stakeholders were interviewed in four rounds. The first took place during the inception mission in Geneva and allowed the team to meet all the relevant senior management (including the former UNHCR Representative in Turkey), many key officers and analysts, other UN agencies, and the Reference Group. These initial sessions were vital to confirm the context of the evaluation and to plan the fieldwork.

The second round of interviews took place during the second stage of inception in Ankara, Gaziantep and Istanbul, when the evaluation team was introduced to key stakeholders and thereby could begin developing hypotheses for testing, and to fine tune the evaluation approach.

The third round took place during the data collection mission where Universalia's team divided into sub-teams, and conducted in person or small group interviews with all key stakeholders across the country.

A fourth and final round of interviews were conducted by phone from Canada after the field mission, during the data analysis and report drafting stage. A standard interview protocol (**Appendix VI**) helped the team conduct interviews and collect this essential data in a systematic manner.

### Field visits in camps and non-camp settings

Despite the operational pressures of the moment, and in particular the prospect of a large-scale influx of new arrivals in the south and a heightened degree of sensitivity regarding onward movement to Europe, UNHCR staff and partners were most accommodating and facilitated a very smooth series of field visits and meetings in six cities: Ankara, Istanbul, Gaziantep, Hatay, Bursa and Konya - the last two being cities without a UNHCR or significant IP presence (visited in order to assess protection and assistance in control situations where UNHCR has no presence). The only (but serious) limitation in terms of access was that the evaluation team had access to only one of the 26 Syrian refugee camps managed by AFAD and its implementing partner TRC. The complete list of persons and institutions met during the evaluation is presented in **Appendix VI.**

## *Focus Groups*

The evaluation team sincerely hoped to be able to organise focus group discussions (FGDs) with refugees in camps and out of camps, but in the end was no able to do so, and even the one camp visit did not permit an open discussion. The team did meet with small groups of refugees in an unstructured way, mainly while visiting community centres, but not in a way that was methodologically sufficient. Instead, the evaluation team has relied on secondary data, particularly reports of focus group discussions carried out by partners. UNHCR's periodic Age Gender and Diversity Mainstreaming (AGDM) Participatory Assessments[20] were an invaluable source of information, in particular on protection issues.

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[20]  See section below on AGDMs

## *Evaluation Matrix.*

The Evaluation Matrix was based upon the terms of reference, and then modified through three iterations: the technical proposal, discussions with UNHCR HQs during the first inception phase in Geneva, and then the final inception phase in Turkey, which also took into consideration comments from the Reference Group.  The Final Evaluation matrix, presented in **Appendix II**, has been updated to reflect these changes.

## Presentation of evaluation results

The first deliverable, presented to UNHCR on 12 February, was the Inception Report.  No significant changes were requested by PDES and UNHCR Ankara, and the evaluation team immediately began data collection.

At the end of the data collection phase, the team presented preliminary findings to UNHCR Turkey on 4 March, and separately to UNHCR MENA Bureau, in a presentation following the format approved in the Inception Report and following the evaluation questions: Coordination, Efficiency, Coverage, Appropriateness, Impact and Sustainability, and a review of thematic findings in Protection, Education, Community Empowerment and Core Relief Items. Valuable feedback from UNHCR allowed better understanding of several aspects, and suggested further channels of follow-up over the ensuing weeks.

The draft of the Final Report was presented to UNHCR in the week of 15 April 2016. After a round of comments from UNHCR and the Reference Group, the evaluation team was requested to revise the report by moving away from the organising principle of the ten evaluation questions, and instead focusing on five key areas: Strategic Positioning, Protection, Education, Social Cohesion, and Programming.

## Limitations to the evaluation

The online survey yielded some useful data but had a disappointingly low response rate, and the team was not able to conduct focus group discussions with refugees.  This lack of primary data was compensated by secondary data and a greater emphasis on key informant interviews.  Finally, the team faced the challenges of considering a historical period 1 January 2014 – 30 June 2015 when many of the key people from that period were no longer available for interview, and everyone's attention was focussed upon the immediate issues of February 2016 - in particular the mixed onward or secondary movements to Europe and the Turkey-EU agreement that were outside the scope of the evaluation.  The evaluation team has attempted to take the changed context into account in order to provide recommendations drawn from 2014-2015 that are useful to the programme in 2016-2017.

## Evaluation team and acknowledgements

# 3 Strategic Positioning

## Coordination

**Finding 1.     UNHCR's relationship with the Government evolved as the coordination roles of the Office of the Prime Minister, DGMM and AFAD changed over time**

From its outset in April 2011, coordination of the Syrian refugee response in Turkey has been confidently managed by the Government of Turkey.  As explained in greater detail in the Context Chapter above, over the five years of this emergency the Government's institutional configuration and its coordination mechanisms evolved considerably and in ways that were not always clear to stakeholders, including UNHCR.

Initially the Government declined offers of assistance from UNHCR and other stakeholders, and the Government was not substantively involved in the Turkey chapters of the UNHCR-managed Regional Response Plans (RRP) issued from March 2012 onwards.  Only in 2015, in the context of the 2016-2017 3RP, did the Government provide written comments and inputs on the UN strategy.[21]  Unlike in the other RRP/3RP countries, international NGOs are not part of the Turkey chapter of the UN regional appeals.[22]

The most important obstacle to effective coordination in this context of strong Government leadership is that, during the period under review, the Government itself did not provide a single clear articulated strategy to guide everyone's actions, and furthermore did not provide basic information on the population to international stakeholders. Instead, for reasons of evolving context and institutions outlined in the Context Chapter above, the Government made requests to the donors, UN agencies and INGOs depending on the priorities and needs of the day, to which the external stakeholders responded as best they could, given their prevailing constraints and available resources.[23]

> " *"This is a difficult country to help"*
>
> *– Donor representative* "

### Three loosely connected communities of coordination

**Finding 2.     There are three distinct communities of coordination in Turkey, each with its own "coordination culture"**

Although the Government is now much more open to work with donors, UN agencies and INGOs, the period prior to the emergency influx was characterised by different stakeholders mainly organising

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[21]Interview with UNHCR staff

[22] Initially there were few international NGOs operating in Turkey, and the Government started registering large numbers of INGOs to work in Turkey from 2014 onwards.  In 2015, a handful of INGOs supporting Food Security were included in the appeal for the first time, as a group

[23]Several interlocutors, in particular donors, observed the delicacy of a situation where the Government was proud of the assistance it was providing and not asking for help, at the same time as they bemoaned the lack of burden-sharing and the limited international contributions

themselves. This set the stage for a situation that continues today, consisting of three loosely connected communities of coordination: (a) a Government mechanism that has itself evolved over the five year period,[24] and where the Government primarily coordinates its own substantial programmes, involving some NNGOs but only occasionally UNHCR;[25](b) a UN system that coordinates UN agencies and IOM; and (c) various donor-driven and occasionally INGO-driven mechanisms to coordinate between organisations working with a particular donor or in a particular sector.[26]  In addition, there are several sector-specific working groups, some at national level and some at local level, some organised by Government, others chaired by UNHCR or by other lead agencies, and some organised around issues (for example harmonising the services offered by community centres).

To a large extent, these three communities of coordination reflect the three main sources of funding for the Syrian emergency: Turkish Government funding (both national and local), donor funding through UN channels and notably the RRP6 and 3RP, and donor/private funding that flows directly to NNGOs and INGOs outside the Government and UN framework (including substantial EU and US Government funding).

They also reflect three distinct "coordination cultures" that do not comfortably work together: a Government culture which follows official hierarchy and functions through regulations and directives; a UN culture which relies on a division of labour among similar agencies to build composite planning and reporting frameworks; and a donor culture which is characterised by portfolios of geographic or sectoral projects proposed and managed by implementing agencies. These three coordinating communities co-exist, and between them there do not appear to be major gaps, but in the absence of single overarching coordinating and priority-setting mechanism there are almost certainly inefficiencies and missed opportunities.

**Recommendation 1.     UNHCR Turkey should work with the Turkish Government to revise the overall coordination architecture at national, provincial and municipal levels, in order to optimize the effectiveness, efficiency and coherence of the Syrian refugee response**

## Coordination within the UN system

**Finding 3.       The UN Resident Coordinator and the UNHCR Representative disagree on who should coordinate UN agencies supporting Syrian refugees in Turkey**

Within this coordination universe, the coordination mechanisms prevailing between UN agencies in the period under review were not tidy.  Underlying this untidiness is that there was and still is no clear agreement between the UN Resident Coordinator and the UNHCR Representative regarding who has overall coordination responsibility for UN agencies supporting refugees in Turkey, and in particular for representing the UN to the Government of Turkey on refugee matters. Both the Resident Coordinator and the UNHCR Representative have well-justified arguments in favour of their overall responsibility: the

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[24] Since 2015 this is led by the Chief Advisor to the Prime Minister for Immigration and Humanitarian Aid

[25] At the moment, this report was being drafted, after the end of the period under evaluation, the recently-created Office of the Chief Advisor to the Prime Minister was proposing a welcome new mechanism to coordinate a higher level of Government engagement with the 3RP and organised around the main 3RP sectors and agencies

[26] Note that most of the INGOs working with UNHCR entered the country in 2013 and 2014, and the majority set up their national offices in the field – even today very few have Ankara offices

Resident Coordinator holds that he is the senior representative of the UN to the Government of Turkey and responsible for coordinating all UN agencies in country under the mandate of the Resident Coordinator system.[27]  To exercise this responsibility, in 2013 the Resident Coordinator set up the "Syria Response Group" chaired by himself, and made up of the Heads of Agency of those UN agencies supporting Syrian refugees in Turkey as well as cross-border operations from Turkey into Syria.[28]

The UNHCR Representative has her own set of responsibilities stemming from UNHCR's "Statute [which] places the High Commissioner and his Office at the centre of the international refugee response system, including in respect of coordination functions."[29]  While continuing to participate as a full member of the UNCT as well as in the Syria Response Group (which now meets less frequently), from 2011–2014 UNHCR Ankara chaired the UN Task Force on Syria, a working-level body within the RRP framework and which managed practical/technical coordination between agencies in country.

The respective coordinating roles of the UNHCR Representative and the UN Resident Coordinator were somewhat clearer in the period 2012-2014, when the overall UN response for Syrians outside Syria was managed through the Regional Response Plans 1-6, all of which were coordinated unilaterally by UNHCR. However, since 2015 and the transition from the RRP (Regional Response Plan) to the 3RP (Regional Refugee and Resilience Plan), the emphasis on the resilience dimension has resulted in a transition to co-chairing of the Syria Task Force between UNHCR and UNDP.

| Finding 4. | UNHCR was more effective at coordinating with UN partners than with Government or NGO partners |
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Thus, it is that as of January 2015, there was a somewhat confusing UN coordination architecture consisting of (a) a Heads of Agency Syria Response Group (SRG) chaired by the RC, which meets irregularly depending on the needs of the evolving situation, and (b) a working-level UN Task Force on Syria co-chaired by UNHCR and UNDP, and which operates as if it were a technical committee of the SRG to the extent that its strategic decisions regarding the 3RP are referred to the SRG.  Despite the shortcoming of being limited to UN agencies, the parties involved feel that **the Ankara-level mechanisms are somewhat effective.  They provide the basis for regular information exchange and coordinate the processes of preparing and reporting on the Turkey chapter of the 3RP, but they fall short of making difficult substantive decisions** such as, for example, which sectors and agencies should be de-prioritised in the event that full 3RP financing is not available, or how to allocate un-earmarked resources provided to the 3RP.  Regarding the coordination spectrum described in Table 3.1 below, the Ankara-level mechanisms are somewhere between "coordinated" and "partly harmonised".

| Finding 5. | In RRP6, each agency's submission was internally coherent but there was no mechanism obliging agencies to be horizontally coherent |
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The RRP6 and 3RP are generally regarded as necessary for providing a common narrative for the UN response and for providing to donors a sense of confidence that there is a credible, coherent coordinated

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[27]The Resident Coordinator function for humanitarian coordination is described (https://undg.org/wp-content/uploads/2015/01/APPROVED-RC-Job-Descriptions_Feb_2014.pdf) and is silent on refugee responsibilities

[28] Operations in Syria, including cross-border activities from Turkey, are coordinated by the Humanitarian Coordinator in Damascus

[29]UN High Commissioner for Refugees (UNHCR), Note on the Mandate of the High Commissioner for Refugees and his Office, October 2013, available at: http://www.refworld.org/docid/5268c9474.html [accessed 22 March 2016]

plan for Syrians in Turkey.  The RRP6 (which was UNHCR-led) was built up as a composite of all the UN agency appeals, packaged under a single framework and with some common metrics.  Each agency reported on its results, and these were aggregated into the final report.  From a coordination perspective, what is important is that the agency-based design principle presented few requirements for agencies to negotiate, to compromise and to adjust their plans in relation to others working alongside them in the same sectors.

**Finding 6.     In 3RP, the quality of coordination is better but the resistance and frustration with coordination is also higher**

With the changeover to the 3RP methodology, several important changes were introduced.  Firstly, the universe was divided into sectors each containing multiple agencies, then each sector met as a group to agree on the goals and objectives of the sector, after which each agency then went away and determined what would be its contribution to the mutually-agreed sectoral goals.  This sectoral method of planning was significantly heavier and more stressful – the stress being the healthy consequence of coordination effort forcing parties to agree on a supra-Agency set of goals, and then to coordinate their activities within that frame. **This is clearly a step forward in terms of coordination quality, and the 3RP is a stronger plan.** But at the same time, the 3RP has now created a greater coordination burden during implementation and reporting, as agencies which hitherto could submit their "chapter" and then quietly implement their agency plan for the rest of the year must now meet more frequently to synchronise their activities, and to report against common goals.

The second major change between RRP6 and 3RP is the bifurcation of the 3RP between "refugee" and "resilience" components, and leaving the coordination of these components in the hands of UNHCR and UNDP respectively. **Since the two components are quite different in their orientation, time horizons and partner composition, the coordination between these components creates a second layer of complexity.**

The quality of the interagency (RRP6 and 3RP) and internal (COP) planning processes will be discussed in a later chapter on programming.  Here, we will address RRP6 and the 3RP from a coordination perspective, and comment on three specific interagency coordination matters: UNHCR and UNICEF in education; UNHCR and WFP on cash; and UNHCR and UNDP on livelihoods and resilience.

## Thematic coordination issues

**Finding 7.     UNHCR and UNICEF have improved coordination on education but are not implementing the same strategy**

Regarding UNHCR and UNICEF coordination, during the evaluation period there was a marked difference in education philosophy between the two institutions, clearly observed also in the UNICEF evaluation of their own Turkey programme,[30] which reduced the effectiveness of both organisations for a time. These differences are discussed in further detail in the later Education Chapter, and have since been partly resolved by an agreed division of labour between UNHCR and UNICEF.  **While the division of labour resolves the problems of practical coordination between the agencies, the challenges of actually**

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[30]Independent evaluation of UNICEF's response to the Syrian refugee crisis in Turkey 2012-2015; November 2015 p. 44-45

**reconciling the two different approaches to the education of Syrian refugee children remains a major piece of unfinished business.**

| Finding 8. | For cash and e-vouchers, there is no unified coordination mechanism that includes governmental, international and non-governmental organizations |
|---|---|

Coordination between the various agencies on cash and e-vouchers has become more complex over 2014-2015 as more agencies have entered into this field, using funding from inside and outside the 3RP, using cash for different purposes,[31] applying different assessment criteria and package sizes, and including major contributions by Turkish authorities, the TRC and charitable NNGOs.  As of the end of **2015 the field was crowded, harmonisation of approaches was making steady but slow progress under WFP and INGO leadership, and the amounts of funding through cash-based interventions seemed destined to increase as the effectiveness of cash is established** and substantial new non-3RP funding is made available, in particular by European donors.  In this environment, where funding is increasingly outside the 3RP, involving Turkish partners and, increasingly, Turkish government bodies responsible for including refugees in the Government's cash-based social protection schemes, UNHCR needs to consider what its comparative advantage may be in relation to other agencies who are candidates for coordination. **For cash and e-voucher coordination, UNHCR should work towards a unified coordination mechanism, including all related governmental, international and non-governmental organizations.**

| Finding 9. | Despite widespread agreement that it is a priority, livelihoods has problems of coordination, funding and implementation |
|---|---|

Finally, livelihoods is a sector where there was very little UNHCR programme investment in 2014-2015 beyond limited life skills training in community centres.  Instead, UNHCR's efforts were correctly focused on encouraging reform of legislation such that persons under temporary protection would have access to the labour market and Turkish language training.  **UNHCR should continue with the recent agreement that UNDP, supported by ILO, UNIDO, FAO, UNHCR and others, is best placed to coordinate as well as to lead the design and implementation of programmes providing Syrian refugees with access to the Turkish labour market and sustainable livelihood opportunities.**  Now that the RRP6 has transformed into the 3RP and has a clearer focus on employment and livelihoods for Syrians in Turkey, a dimension of assistance that is the comparative advantage of development-oriented UN partners with ties to Turkish domestic departments and to the Turkish private sector, **UNHCR should re-position itself with respect to the livelihoods sector.** Preferably, UNHCR can maintain its emphasis on the enabling environment for refugee livelihoods by focussing on upstream issues such as refugee registration; including skills profiling, refugee labour mobility, Turkish language training, increasing access to vocational training, and maintaining a positive protection space through advocacy and communications, such that Syrians are economically welcomed by Turkish enterprises and citizens.

| Recommendation 2. | UNHCR Turkey should reassess its thematic coordination roles, particularly in education, cash and livelihoods, and be ready to share or step back where other actors have strong capacity and/or mandates to lead |
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[31] For example, "cash for food" vs "cash for CRIs" vs "conditional cash transfers for education"

## Coordination with donors

**Donor coordination is not easy in this context.**  For the first few years, most donors did not direct their Syria funding towards Turkey for three main reasons: (a) Turkey is a developed country, a G20 member and aspiring member of the EU; (b) Syrian refugees in Turkey were not perceived to be threatening the economic and political stability of the host country (in comparison with Jordan and Lebanon); and (c) the Government of Turkey was providing a generous and effective response with its own resources, and not asking for international assistance.  Additionally, most donor embassies did not have dedicated aid professionals in their Ankara embassies,[32] but instead in Amman at the coordination hub for the region, and those few who had humanitarian officers in country tended to place them in the Southern provinces closer to the action and especially closer to the cross-border operations.

This all changed dramatically in 2014-2015 as Turkey suddenly moved to the centre of donor attention due to the continued massive influx of Syrian refugees - highlighted by spectacular arrival events at Kobane and Akçakale, the start of cross-border operations, and above all the increase in mixed onward and secondary movement to Europe.  Currently, donor interest is at an all-time high in Turkey, and **most donors expressed to the evaluation team that they are not getting the sort of briefings that they want from UNHCR.[33]**

What most donors are asking for is detailed information on trends in the movements of Syrian refugees - information on the push and pull factors - and are only secondarily interested in the situation of refugees in-country or in their assistance and protection needs.  So, it is complicated.  Donors are hoping that UNHCR can give them real time information, which is very sensitive and which may not be available.  In the final analysis, the evaluation team concluded that it is not UNHCR's primary role to provide migration intelligence to donor embassies, but rather that **UNHCR should continue to focus on briefing donors on the protection and assistance trends and needs within Turkey** – a subject about which there is much more to say since the Government is now providing more information and has opened up to receiving donor funding.  But UNHCR should provide these donor briefings in a way that is more structured, more substantive, more systematic, and better supported with data and graphics of a nature that donors can retransmit back to their capitals.  Donor briefings should not mainly be about appealing for funding or even resettlement quotas, but rather should be seen as the key opportunity to frame the way that western governments see the refugee crisis in Turkey, and they are an important means to harmonise advocacy with the Government.

## Coordination in Istanbul and Gaziantep

At the sub-national level, the coordination mechanisms are very different between Gaziantep and Istanbul, reflecting the very different histories and operating contexts of the two offices.  The **Istanbul office is small and well-established**, in a city with no significant donor, UN agency or INGO presence, and in a region without camps.  In contrast, the **Gaziantep office is new and fast-growing**, in a dynamic border environment with camps, large out-of-camp populations and cross-border operations; with a substantial presence of UN agencies, INGOs and some donors; and with a concurrent OCHA-coordinated cluster system for the cross-border operations.

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[32] The notable exception is the EU, which has a major aid delegation in Ankara that is tied to EU accession assistance

[33] Five major donors were interviewed

### Finding 11. Coordination was more effective in Istanbul and less effective in Gaziantep

**In Istanbul, the approach taken to coordination can be characterised as "coordination through training".** Given that the Istanbul office was well-established and maintains strong relationships with Government and local NGOs (rooted in the prior support to non-Syrians), and since there are relatively few actors in Istanbul and most of them are Turkish, the Istanbul office has focused intensively on awareness-raising and training of stakeholders in the legal and procedural aspects of support to Syrians. By defining the standards and clarifying the regulatory context, and then training municipal authorities, security agencies, lawyers and local NGOs to meet those standards, **the office has effectively pulled stakeholders to a higher level of shared understanding.** There are no sectoral working groups, but instead there are quarterly meetings where senior staff from Ankara visit Istanbul and meet with all stakeholders, periodic interagency meetings primarily for briefing, supplemented by time-limited working groups on specific issues that clearly require coordination during their formative stages (for example agreeing on standards for legal certification of lawyers representing refugees, or since 2015, developing a common approach to Istanbul-area Community centres). In sum, **the "Istanbul model" is light and practical, and centred around developing capacity to meet agreed standards**. Stakeholders widely consider Istanbul coordination to be good.

This contrasts with the much more complex and fast-changing situation in Gaziantep. In the early days of the response, AFAD firmly coordinated assistance in camps in the Southeastern region. UNHCR's assistance was not requested, and there was little recognition of the growing out-of-camp population. Accordingly, throughout 2012 UNHCR's presence in Gaziantep was temporary and limited to protection monitoring of the camps and observation of voluntary repatriation. In November 2012, the creation of the Gaziantep office was approved.[34] Throughout 2013 the office was headed by three different officers on a temporary basis,[35] it did not have a bank account or a separate cost centre within UNHCR's financial system, and did not have programming responsibilities other than to monitor the distribution of the assistance to camps that started in 2013. Only

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> *"UNHCR needs to develop country specific SOPs and guidelines on each sector where NGOs operate in Turkey. Coordination should be taken up to the next level where the NGOs should be included in the problem solving and advocacy initiative alongside of UNHCR. Information sharing through UNHCR should be taken more seriously and implemented immediately. UNHCR should be more due diligent with information sharing and keep the data updated"– comment from an NGO partner*
> "

in the first days of 2014 was a permanent Head of Office appointed, and immediately thereafter a more conventional coordinating machinery was put in place, although even into 2014 programming responsibility for the Southeastern region remained centralised in Ankara[36] – placing the field office at a considerable disadvantage with regard to partner coordination in the region.

In 2014 a series of sectoral working groups were formed, but even these were not without their challenges as (a) first and foremost, the Government is clear that it is coordinating refugee response – leaving considerable ambiguity about the extent and boundaries within which UNHCR coordination is appropriate or welcome; (b) the Government administration is highly centralised and therefore local coordination with Government was inconsistent; and finally (c) there were significant crossovers with the rapid growth in the cross-border coordination system – usually involving the same agencies and often even the same

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[34] Letter of Observation on the visit of the Board of Auditors to UNHCR operations in Turkey: February 2014

[35] Concerns about lack of management continuity and delayed staffing were raised in the Board of Auditors report, Ibid

[36] UNHCR staff interviews reported that the field did not have copies of the IP agreements until Spring 2014

people, but coordinated by OCHA using the conventional cluster structure. As a result of this rapidly-evolving situation, confused institutional environment and unclear alignment of mandates, the Gaziantep-level coordination structures struggled to gain focus and sustain momentum, and despite the best efforts of UNHCR staff the **consensus of the Gaziantep-based stakeholders is that coordination was and remains weak.**

On the spectrum of coordination depicted in Table 3.1 below, Gaziantep coordination is seen as somewhere between "co-existence" and "division of labour". Five types of concerns were expressed by stakeholders: (a) UNHCR-coordinated mechanisms are not connected to the Government-coordinated mechanisms (this is a local-level manifestation of the different "coordination cultures" mentioned earlier), so sometimes stakeholders get different or only partial information; (b) there are too many coordinating forums with too little value-added; (c) UNHCR sometimes claims the mandate to lead a sector but does not have the experience and expertise to do this effectively – thus taking a coordinating seat that would be more effectively occupied by another organisation; (d) the 3Ws and 4Ws are not a fully-developed system; and (e) some working groups should move beyond information-sharing to joint problem-solving.

Coordination should not be something that UNHCR managers do when they can find the time, and not all staff have the abilities and experience to act in a coordination capacity. The Turkey evaluation reveals that **coordination is a professional skill that needs to become a corporate priority if UNHCR is to meet the leadership expectations placed upon it in large complex emergencies**. If UNHCR were to accord greater priority to coordination, it could immediately put in place some practical measures at the global and local levels such as (a) making coordination abilities a selection parameter for senior staff; (b) making coordination training mandatory for staff who are expected to coordinate working groups or clusters at national and sub-national levels; (c) making coordination an explicit priority in job descriptions; (d) rating coordination performance in the annual staff performance review process; (e) creating/filling Information Management Officer positions promptly.

**Recommendation 3.    UNHCR globally should increase investment in the professionalization of its coordination function**

*Table 3.1    Coordination is best seen as a spectrum from coexistence to unified programming*

| SPECTRUM OF COORDINATION | | | | | | |
|---|---|---|---|---|---|---|
| | Coexistence | Division of Labour | Coordinated | Partly Harmonised | Fully harmonised | Unified programme |
| Information | "Round the table" updates | 3W/4W manually compiled | Periodic web-based 3W/4W | Real time web-based 3W/4W | Real time web-based 3W/4W | Real time web-based 3W/4W |
| Analysis | Separate | Exchange of info on separate analyses | Separate analyses planned together to cover gaps | Agreement on analytical priorities and single analysis | Agreement on analytical priorities and single analysis | Agreement on analytical priorities and single analysis |
| Needs Assessment | Separate | Each assesses needs in own region or sector and shares | Unified metrics so separate datasets are comparable and coverage high | Unified metrics so separate datasets are comparable and coverage high | Single joint needs assessment | Single joint needs assessment |
| Standards and Procedures | Separate | Efforts at coherence but not standard | Agreed SOPs and standards | Agreed SOPs and standards | Agreed SOPs and standards | Agreed SOPs and standards no exceptions |
| Advocacy | Separate | Separate | Some joint advocacy messages | Some joint advocacy messages | Mostly joint advocacy messages | Only joint advocacy messages |
| Plans | Separate | Separate plans recognising comparative advantages | Separate plans based on a shared set of goals and objectives | Coordinated plan built from agency plans | Single plan based on needs not agency plans | Single joint plan that accepts to limit lower priority sectors and limit some agencies |
| Implementation | Separate | Separate with more info sharing | Separate but some sharing of resources | Separate, but with substantial sharing of resources | Consortium of agencies with separate agreements | Single agreement and consortium implementation with single managing body |
| Funding | Separate donor projects | Separate donor projects | Some joint some separate funding | Separate earmarked funding for single plan | Unearmarked funding for single plan | Pooled funding |

## Internal Coordination within UNHCR Turkey

**Finding 12.    Coordination within UNHCR Turkey needs improvement**

The evaluation team was not asked to undertake a management systems review, but did hear from a number of key staff both in Ankara and in the field about **weak internal coordination**, particularly in the period under review when the nature of the operation was in a dramatic transition and the field offices were scaling up.  We heard of problems in communication between Ankara and field offices, and between sections in the same office.  To some extent it is inevitable that there is confusion when most staff are newly-recruited or on short-term assignments, when roles are changing, and between a field which naturally tends to feel

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> ""*The fact that UNHCR Turkey is reporting to two bureaux, and managing three appeals (3RP, Mediterranean, and Iraqi) made the coordination within UNHCR less effective*"– UNHCR staff member
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> "

disempowered or neglected and a head office that is tackling strategic questions which the field does not always relate to.

Nevertheless, we heard of enough instances of duplicated effort, urgent requests without response, and decisions being made without consultation, that we feel there is a need for UNHCR Turkey to update its arrangements of management meetings, reporting relationships and intra-office communications, so that the operation is fully coherent and better equipped to face the challenges ahead.  In particular, we felt that UNHCR should consider: (a) involving Istanbul in periodic senior management meetings; and (b) rationalising (more systematic, more selective, more useful) the two-way flow of key management information between Ankara and field offices.

## Coordination where UNHCR has no presence

**Finding 13.    The large number of refugees spread across urban and rural areas where UNHCR has no presence, suggests an approach centred on engagement with local authorities**

Approximately 1,000,000 Syrian refugees and up to 200,000 non-Syrians are living in cities and rural regions of Turkey outside the reach of a UNHCR sub-office.  To reach out to this population, UNHCR has two main mechanisms: a proxy field presence through a network of small offices set up by UNHCR's major national NGO partner ASAM, and a methodology for community-based protection set up in late 2015, in

which multi-functional teams will cover Syrians and non-Syrians on an area-basis (rather than a population or an issue basis) through periodic field visits.  These two mechanisms will need to include in their work programme a **conscious effort to coordinate with provincial and local governments** – beyond just meeting with these authorities, ASAM and the roving multi-function teams should endeavour to **facilitate and participate in periodic local-level coordination meetings hosted by local government authorities** and involving a range of local government departments, NNGOs and local stakeholders. This should become a primary vehicle for UNHCR to gain a deeper understanding of

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> "*Considering the size of the population and the large area that this population is dispersed throughout, outreach to refugees living out of camps is both a challenge and a priority*"– UNHCR staff member
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> "

dynamics in these more remote populations of concern, to bring local stakeholders onto the same page regarding regulations and best practices, to provide training, and also to facilitate harmonisation of approaches. We could characterise this as a **lighter more mobile variant of the Istanbul model**.

## UNHCR management arrangements

### Human Resources management

One of the curious features of the Turkey operation is that, despite hosting the largest refugee population in the world and being a key part of the largest L3 emergency in recent history, the Turkey response was never considered to be a full-blown emergency by either the UN system (there is for example no HC/HCT activation) or by UNHCR. This is for reasons outlined in the Context Chapter above, and notably the fact that the Government of Turkey did not initially request UNHCR assistance and, when it did, this was for specific elements of a non-emergency nature (for example Core Relief Items (CRIs) to supplement Government stocks, support for registration equipment and training, support for Turkish schools hosting Syrian children).

### Finding 14. The fast-track staffing mechanism worked as intended for Turkey

Practically speaking, Turkey was handled as a slow-onset emergency, with a gradual adaptation of a prior programme to a different situation with new needs. The figure below clearly shows the transformation in staff composition from a non-Syrian RSD and Resettlement operation, over to one focused on protection and assistance for Syrians: mostly in the period under evaluation.

*Figure 3.1    UNHCR Human Resources response to the increase of Syrian refugees in Turkey*
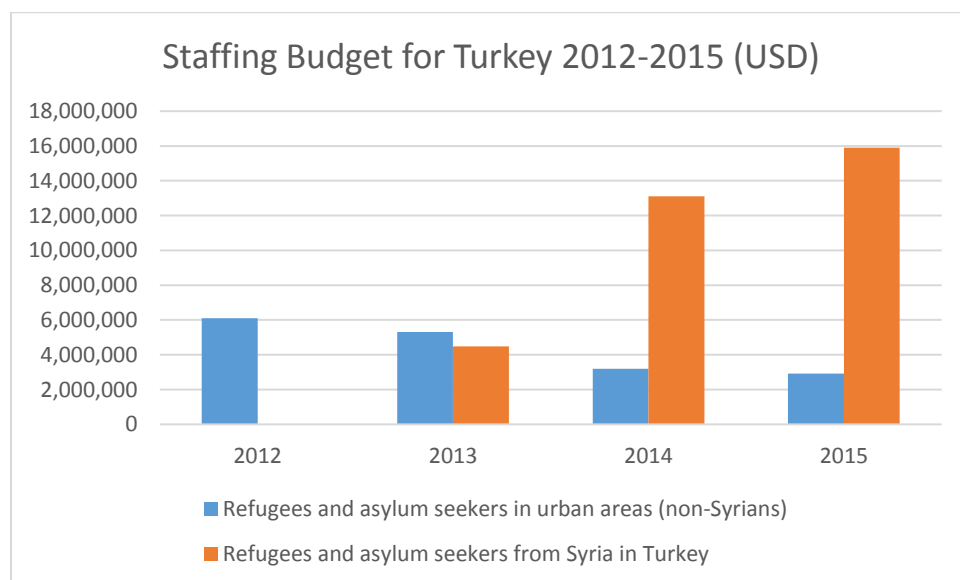
Accordingly, even though Turkey was eligible for emergency[37] and fast-track[38] deployments as part of the greater Syria response, there were few requests made by the Turkey operation, especially few relative to other Syria response countries in the late 2012 - late 2013 timeframe, when Turkey was relatively quiet and the action was in Jordan and Lebanon. Altogether, between late 2012 and mid-2014, 20 international staff were assigned on fast-tracks: 15 to Ankara and 5 to Gaziantep (including some for the cross-border operation). With a couple of notable exceptions, including the critical positions of the Head of the Gaziantep Field Office and the Information Management Officer in Ankara, the deployments were made between 8-10 weeks after the advertisements were launched – a remarkable achievement and **a validation that the fast-track process is generally working well for those who are requested, identified and assigned**.[39]

However, an analysis of the staffing tables for the period under review also revealed that several critical positions were left vacant for considerable periods,[40] and we conclude this is either because they were not requested by Ankara, and/or because they were requested but suitable candidates could not be identified, and/or because the staffing processes in the field were slow.

| Finding 15. | National staff are a key success factor for the Turkey operation |
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At the Ankara level we have concluded that one reason for the high level of local staff **vacancies is that the key enabling functions of Administration and Human Resources were understaffed** and slow to scale-up when the operation needed to rapidly recruit new national staff outside the traditional areas of refugee status determination and resettlement.[41]This was all the more serious, and became a significant bottleneck, because the Turkey operation relies heavily upon national general services staff and national officers. Indeed, the number and proportion of **national officers in Turkey is among the highest in the world, and there is no doubt that this is both essential and key success factor** for all UN agency operations in Turkey. From the table below (note this is a table of positions not staff - and many positions were vacant), it seems that the overall strategy was first to staff up national officer positions[42] (more than doubled in 2014), then in a second phase to recruit national general services staff (also more than doubled between 2014 and 2015) as well as recruit more international staff (mostly for Gaziantep). **This seems to**

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[37] Temporary deployments, extended missions, usually 2 weeks – 3 months to fill a specific short-term gap or to deploy someone in advance of a permanent deployment expected to follow in a few months

[38] Regular assignments where the processing is accelerated and out of the annual cycle, in response to a fast-changing high priority situation

[39] The suggestion was made by national staff and by Turkish officials that UNHCR international staff – especially those on short assignments – should be given targeted orientation to Turkish bureaucratic culture in order to smooth over likely misunderstandings arising from the preconceived notions of globally-mobile international staff and the very specific systems and proud traditions of the Turkish government. It was also observed that Turkish officials highly value both education and specialisation, and that in cases where UNHCR international or national staff appear to be inexperienced or under-qualified, they have difficulty to be accepted by Turkish officials and partners

[40] 20% of all positions were vacant in January 2014 and 25% were vacant in July 2015

[41] In January 2014, there was no international Admin and Finance Officer position, there was a vacant Admin and Finance NOD position, and the only staff handling HR were one NOA Assistant Admin and Finance Office and a G5 Senior HR Associate. The HR officer was staffed by January 2014, but then three different HR officers filled this position over the next 2 years

[42] In addition to new positions and recruitment, the Turkey operation should be recognised for its ability to identify strong national staff and promote them from within, including important jumps from the GS to NO categories, and promotions within the NO category. There is no doubt this has provided essential continuity and performance

**the evaluation team to have been the appropriate strategy** – and it is evident from the dramatic increase in positions as of January 2015 that a huge effort was invested in staffing in the second half of 2014 – but it would have been better still if that recruitment push had been started 6-12 months earlier.

*Figure 3.2     From 2014 to mid-2015, UNHCR national positions (GS and NO) more than doubled*



Approved positions all Turkey (2014 - mid 2015)

| | General Service | National Officer | International Professional |
|---|---|---|---|
| Jan 14 | 121 | 15 | 27 |
| July 14 | 107 | 33 | 28 |
| Jan 15 | 227 | 37 | 46 |
| June 15 | 226 | 36 | 46 |
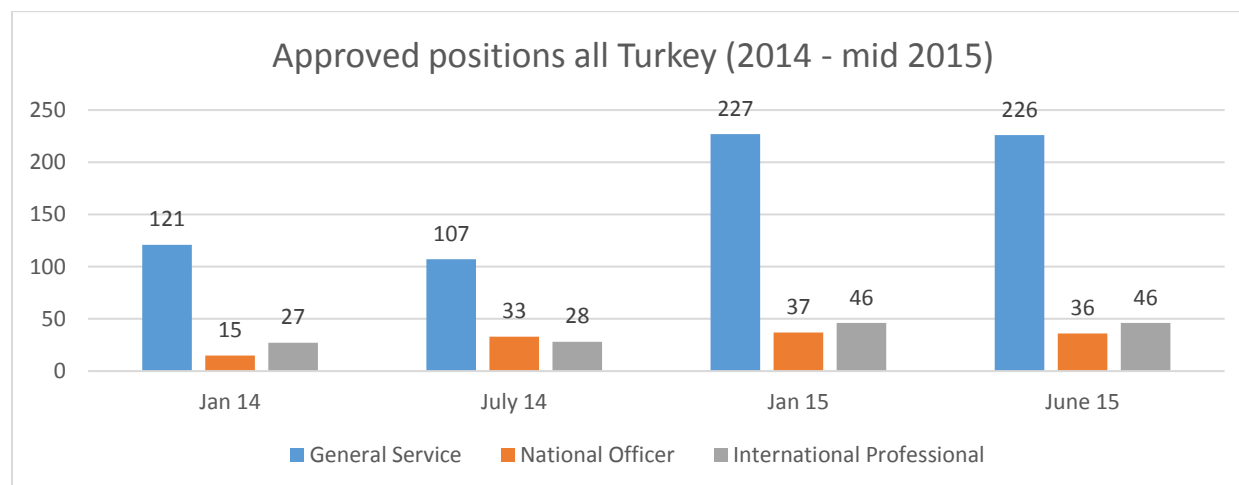
## Finding 16.     Some critical positions were left unfilled for too long

Beyond the lack of a strong dedicated HR function within the Ankara office, additional factors contributing to slow staffing were reportedly (a) late recognition on the part of management of the need to staff up certain areas that could have been anticipated (for example programming and supply),[43] (b) difficulty finding candidates for certain types of positions (programme, supply, project control, human resources management, information management) that are in short supply system-wide, and (c) cumbersome staffing procedures particularly for local recruitment that falls outside the fast track processes.

For whatever combination of these and other factors, at a time when operations were expanding rapidly, essential Programming and Supply sections were characterised by unfilled international and national positions, and short-term assignments that did not permit relationship-building with Government and partners, consistency of programming and contracting approaches, and continuity throughout the programming or procurement cycle.[44]  In addition, positions that are critical for interagency coordination, donor relations and communications were left unfilled or at too junior levels for longer than necessary.

The problems of staffing were even more evident at the Gaziantep level, where positions were slow to be created and staffed despite front-line pressures.  The vacancy rate was 60% in July 2014 and 40% in January and July 2015, and strong national staff were lost to other agencies offering better terms and more job security as soon as Gaziantep became a hot job market for skilled national staff.

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[43] In March 2014, a senior management mission to Turkey assessed the need for an organisational redesign and for priority staffing.  The mission recommended a protection-centric approach including more resettlement resources, but was silent on programming, operations and even Gaziantep

[44] It is important to note that these shortcomings observed in the period under evaluation have been partly addressed in the course of 2015, and that as of the end of 2015 all functional areas of the operation have a core of stable and experienced staff.  The rapid turnover seems to have stopped, although there are still insufficient positions in some key areas and in particular in areas planned for greater attention in the near future

**Recommendation 4.**  **UNHCR Turkey should continue strengthening its HR capacity in order to support the continuing growth of its programming and protection commitments in Turkey.  Specifically: (a) UNHCR Turkey should intensify efforts to recruit mid-level managers and officers with 21st century skills, including information management, cash-based interventions, modern HR management, and strategic communications; and (b) UNHCR in Turkey should maintain the current policy of staffing key positions with national officers, wherever appropriate**

## Management efficiency

UNHCR has a lighter administrative and management regime[45] for emergencies, and a heavier one for regular/ongoing refugee situations.  Because Turkey is not considered as an emergency operation, it is subject to the heavier and more cumbersome requirements of a normal programme.  However, with more scale and complexity, and without a commensurate growth in programming and administrative capacity, the operation is caught in an uncomfortable squeeze where it is often unable to meet HQ requirements on time or at the levels expected, or it does so by placing huge stress on a small hard-working team.

**Finding 17.**  **Several staff in the country office feel that the burden of complying with heavy corporate processes detracts from their ability to manage more strategically**

By way of example, the new HQ procedures for the selection of Implementing Partners requires a cumbersome universal proposal submission and evaluation process, which in Turkey generated 53 detailed proposals to evaluate,[46] of which 12 were recommended after review by Ankara and UNHCR HQ, and a further 19 were retained as "potential".  In another example, the requirement to make public announcements for national staff positions, combined with the need to receive paper applications on P11s, has resulted in over 3,000 paper applications being received and manually processed, for about 70 local staff vacancies.[47]UNHCR has reportedly received six different audit or evaluation missions led by various stakeholders in a six-month period (including this evaluation team).  And a final example (cited earlier) is that UNHCR in Turkey is now planning with 5 Population Planning Groups (PPGs), essentially requiring UNHCR to sub-divide the operation for planning, results measurement and budgetary purposes into five separate sub-programmes – some of which are managed in whole or in part by four different offices inside Turkey.  At a time when the activities for different groups are actually <u>merging</u> as UNHCR moves towards area-based community-based protection and integration with national systems, and as UNHCR is seeking to gain economies of scale, it makes even <u>less sense</u> to artificially separate the operation into 5 PPGs.

To a large extent these problems are corporate and cannot be resolved locally or maybe not even globally[48] – but the evaluation team has to note that the combined effect of so many HQ processes and accountability mechanisms is that the small programme team spends too much time on data entry and paperwork, and not enough on ensuring the quality of programme design and IP agreements, or on monitoring programme performance.  Similarly, the administrative staff spend so much effort on required

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[45] Lighter processes, higher thresholds, more delegated authorities

[46] Communication from UNHCR Ankara

[47] UNHCR staff interviews

[48] Many of these administrative requirements result from UN regulations, EXCOM decisions or donor requirements

paperwork that they are not able to devote as much attention as they would like to thinking ahead and strategically managing staffing, travel and financial management. As a way forward, UNHCR Turkey could inventory the corporate processes that are placing an excessive strain upon their limited field capacity, and then UNHCR HQ should assess and explicitly agree with the field which processes can be curtailed or simplified, or moved under "emergency" rules, in order to enable the field to meet essential programming and administrative requirements.

| Finding 18. | Frequent and uncoordinated visits from HQs and donors place a heavy load on senior management |
| --- | --- |

Finally, UNHCR Turkey has attracted a huge amount of public and political attention, receiving a constant and recently accelerating stream of senior UN and donor visitors. While UNHCR does and will no doubt continue to do its best to support all these visiting missions, and whereas senior management sees supporting senior missions and donor visits as an essential part of their jobs, there is also no doubt that the amount of time spent supporting these senior visits leaves less time for their core management work. Visits will not cease and nor should they, but with some advance planning they could be better anticipated and managed, similar visits could be bundled, and timing could be better coordinated. In the development realm, the principle of joint donor missions and "mission blackout" periods are well-established, and have been somewhat successful in leaving field people some predictable time in which to handle their other essential business.

## The problem of targeting when there is no data

| Finding 19. | The lack of systematic vulnerability data inhibited the ability of UNHCR and its partners to prioritise vulnerable Syrian refugees in Turkey |
| --- | --- |

It was observed in the Context Chapter that UNHCR does not register Syrian refugees in Turkey, and furthermore UNHCR does not have access to the Government's registration data (see more detailed discussion in the Protection Chapter below), which in any case does not capture key vulnerability information such as family structure (i.e. whether there are adult breadwinners or girls susceptible to early marriage), disabilities or special needs. Without knowing who the refugees are, or even how many and where they are, it is impossible to effectively target them for protection or assistance.

| Finding 20. | UNHCR attempted, but was prohibited from conducting a comprehensive needs assessment |
| --- | --- |

In normal circumstances, generating, analysing and disseminating data and information are core UNHCR activities and provide UNHCR with the authority and the tools to coordinate other actors in the emergency response, as well as to ensure that its own programme responds to the priority needs of refugees. Especially in a fast-changing and resource-constrained environment, accurate and timely information and analysis is indispensable for tailoring programmes to the needs of persons of concern, and in particular those most vulnerable. To fulfil this core function UNHCR's Emergency Information Management Toolkit[49]recommends that UNHCR should lead a comprehensive nation-wide "joint" multi-sectoral needs

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[49]Emergency Information Management Toolkit, UNHCR, Field Information and Coordination Support Section, Division of Programme Support and Management, UNHCR Headquarters, Geneva

assessment, but despite UNHCR's sincere efforts in this respect from 2013 onwards,[50] the Government did not permit UNHCR to do this. Instead, the Government conducted its own much more limited assessment through AFAD, which to this day is the only general profile of Syrians in Turkey.[51][52]

Whatever the reasons for this,[53]UNHCR staff, implementing partners and other relevant stakeholders[54]universally stated that lack of data from the Government (sex and age disaggregated, numbers of persons of concern, protection vulnerabilities, their ability to access assistance, health and education services, education and skills levels, income and economic potential, housing) was the greatest constraint to the formulation of effective and coherent programming.

*Table 3.2* *Q. 11 (Survey) "How effective was UNHCR in supporting the Government of Turkey to protect the following groups of Syrian refugees?"[55]*

| GROUP/PERCEPTION | STRONGLY EFFECTIVE | EFFECTIVE | SOMEWHAT EFFECTIVE | NOT EFFECTIVE |
|---|---|---|---|---|
| **Women** | 36,4% | | **57,6%** | |
| **Children** | 45,5% | | **48,5%** | |
| **Disabled persons** | 33,3% | | **54,5%** | |
| **Elderly** | 36,4% | | **51,5%** | |

Only a third of UNHCR's policy and programming staff believe that UNHCR is effective in supporting the Government of Turkey to protect the most vulnerable Syrian refugees. One principal reason provided in survey responses was the problem of data: "*the identification of categories at risk and with acute vulnerabilities depends on the introduction of an effective, protection sensitive registration system*", and "*current registration procedures do not allow for an accurate recording of vulnerabilities, thus weakening the capacity to identify and respond to situations of vulnerability,"[56]*and *"since UNHCR is not involved in the registration of Syrian refugees and has limited access to data on vulnerabilities (through partners), designing and implementing effective interventions can be challenging."[57]*

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[50] UNHCR planned and contracted a comprehensive profiling exercise profiling exercise in 2013, but just prior to launch the Government requested that this be handed over for implementation by AFAD. Similarly, a nutritional assessment was conducted by the Government and UNICEF but its release was cancelled by the Government

[51]Syrian Refugees in Turkey 2013; AFAD, 2013, followed by another profiling report on Syrian women based on the same data. The evaluation team was informed that, in the next round of registration validation planned for 2016, DGMM intends to collect vulnerability data and bring the registration closer to UNHCR standards

[52] A comprehensive nutrition survey of Syrians was conducted by the Government and UNICEF, but was shelved a few days before its planned release and has still not been made public

[53] The evaluation team heard several reasons why the Government might not have shared their data: the logistical magnitude of assessing millions of refugees scattered all over the country, institutional capacity weaknesses, jurisdictional obstacles, legal concerns around privacy of personal information, policy concerns around "guest" status etc.

[54] Interview notes with UNHCR, UNDP, UNICEF UNFPA and UNHCR's IPs

[55]Survey results, Q.9 (See Appendix IV)

[56]Response to Q.13, Survey report

[57]Other response to Q. 13, Survey report

The evaluation team was informed[58] that the Government of Turkey intends to include a wide range of profiling information in a planned round of registration validation. Even though it seems unlikely that the Government of Turkey would release the raw data from this exercise, assuming that it goes ahead as planned, the data would at least be captured and would (a) presumably be made available to Turkish authorities who are the primary providers of services to Syrian refugees, and (b) in some de-personalised and aggregated forms the data could be used to provide a much more accurate profile of the Syrian population that would support the evidence base for planning.

**Recommendation 5.** **UNHCR Turkey should support the Government to conduct a comprehensive vulnerability assessment in conjunction with a validation exercise planned to take place in the near future, taking care to ensure that the hard-to-reach populations (which are also likely to be among the most vulnerable) are included**

**Finding 21.** **Distribution of e-vouchers and CRIs provided a pathway to household vulnerability assessment when a direct survey was not possible**

In the absence of a comprehensive survey, a wide range of agencies, NGOs and government bodies have been conducting their own local, unconnected and issue-specific surveys. While there was a considerable caution initially (given the Government's blanket prohibition on collecting personal information on Syrians in Turkey), the number and range of these local surveys grew as the need for them became inescapable, and in particular in order to allow Government and UNHCR partners to determine to whom winterisation and other material should be distributed.

During the evaluation mission the team identified five main sources of such piecemeal assessment data: (a) surveys conducted by municipalities and local NGOs with little or no reference to UNHCR and the formal refugee assistance system, (b) surveys conducted by UNHCR's and WFP's partners in order to target Core Relief Items (CRIs), food assistance, or cash/e-vouchers to out of camp populations, (c) intake and programme data collected by community centres,[59] (d) ad hoc studies on regions or issues conducted by Turkish and international NGOs and think tanks and published in English, Arabic and Turkish,[60] and (e) periodic participatory assessments (AGDM studies and focus group discussions in the context of 16 days of activism against SGBV) conducted by UNHCR itself. Those vulnerability assessments that were conducted at the household level for purposes of distribution planning used similar criteria, and efforts were taken throughout 2015 in particular in Gaziantep to coordinate the vulnerability assessment criteria through a vulnerability assessment sub-group of the NFI/CRI (Core Relief Items) working group.

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[58] Interviews with Government of Turkey and UNHCR

[59] ASAM, HRDF and STL Needs Assessment Reports in Gaziantep, Hatay and Istanbul

[60] See in particular, IMC-Care's Gender-based needs assessment on the Kobane influx in September 2014, Concern's beneficiary-based needs assessment from 2013, and IMC's beneficiary-based needs assessment from Gaziantep in March 2015

**Finding 22.    Although CRI and e-voucher coverage was low in relation to the population, recourse measures were in place where distribution programmes were operating**

The evaluation team was not able to meet refugees or to validate the quality of this vulnerability targeting, but has no reason to doubt its integrity, and did observe a number of recourse mechanisms in place to allow refugees to seek redress if they felt they qualified for a benefit that they did not receive.

**Finding 23.    Some valuable data is not shared, thereby inhibiting effectiveness and efficiency of service delivery**

Beyond the challenge of actually collecting data from refugees in a regulatory context where this is formally prohibited but practically tolerated, there is a secondary and related problem that organisations which have data are reluctant to share it openly.  Some data is published (often in a sanitised form), but a lot of important raw data is retained by the surveying organisations, and therefore not available to other parties trying to analyse similar problems or even distribute items to the same population.

Data sharing is a missed opportunity in two respects.  Firstly, the existing piecemeal assessments could be assembled to develop a composite portrait of vulnerability.  This could be overlaid with recently-released DGMM data on the distribution of the Syrian refugees, and then this hybrid profiling information could be provided to all stakeholders (including government) to help them improve the evidence base of their planning.

Given the concerns expressed by DGMM regarding a comprehensive needs assessment, and until such time as DGMM conducts a deeper and

### IMC Rapid Needs Assessment in Gaziantep

The Rapid Needs Assessment by International Medical Corps in July 2015 surveyed 5,190 individuals from 948 households in 63 neighbourhoods of Gaziantep.  This study showed the high rate of employment among Syrian refugees and the sectors of their labour market - 93% of respondents had at least one family member gainfully employed and 22% had more than one family member earning an income. It showed that 12% of school-aged children were working rather than attending school, as well as information on why refugees in Gaziantep were choosing to live in urban areas rather than camps.

Such detailed data gathered, compared and validated from other refugee hosting areas could have been compiled by UNHCR and provided to partners as a starting point for joint planning, but such was not the case.

comprehensive assessment as part of the planned validation, it is recommended that UNHCR take measures to consolidate existing needs assessments and refugee-centred consultations at the provincial level in order to assist all stakeholders in their planning efforts.[61]  Such an approach was effectively taken by UNICEF in its work with provincial authorities; despite the fact that it faced many of the same obstacles experienced by UNHCR, UNICEF nonetheless succeeded in establishing shared needs assessments and action plans with most provincial authorities.

**Recommendation 6.    Pending a comprehensive national vulnerability assessment of Syrian refugees in Turkey, UNHCR Turkey should assemble all of the existing needs and vulnerability assessments, and the results of various refugee-centred consultations, and build a composite portrait of the vulnerabilities of the Syrian refugee population**

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[61] The evaluation team was informed that this was included in current UNHCR planning

**Finding 24.** **There is a significant and rapidly-growing body of academic and technical literature on Syrians in Turkey but it is fragmented and hard to access**

But secondly, there is a great need in Turkey for a neutral platform to share all information and analysis on the situation of Syrian refugees. Syrians in Turkey have become a favoured topic of new academic research, and there are presumed to be hundreds of Masters and PhD theses being written on the topic at the moment, especially but not only in Europe and in Turkey, and in Arabic and Turkish as well as English. What is needed is a managed central online repository of this research and analytical material, housed in an established university or non-Governmental policy body, supported by the smallest of Secretariats to continue to search for and classify new material, and possibly to create a periodic digest of key research for distribution to interested stakeholders. A step up from this would be to **convene an annual academic conference where researchers and policy analysts could come together and collectively advance their understanding of Syrians in Turkey**.

**Recommendation 7.** **UNHCR Turkey, in conjunction with other stakeholders, should facilitate the creation of a managed central online repository of data, research and analytical material on Syrians in Turkey, possibly to be housed in an established university**

## Conclusion

In the original TORs and draft of this evaluation, there was no explicit discussion of "Strategic Positioning", but interviews and lines of enquiry kept coming back to an implied central question: "what can UNHCR learn from the unique Turkey experience that can help UNHCR be more effective in similar contexts" where there is a confident host government in a middle income country that is experiencing a huge refugee influx. UNHCR's role in Turkey is quite unlike its role in a "classic" refugee emergency, arguably it is different than its role in Jordan or Lebanon, and closer to what might be expected if ever UNHCR were engaged in a large-scale refugee influx into a BRIC country. Most of the conventional mechanisms of humanitarian coordination, models of assistance and conventions of donor relations are irrelevant – and international staff who come into this sort of context (or who view Turkey from the distance of Amman or Geneva) with deeply-entrenched assumptions about what UNHCR should do and how UNHCR should do it are going to be at a serious disadvantage. Particularly when the context of Turkey is overlaid with the political pressures of the Turkey-Europe relationship and of Turkey's strategic role in the region, nearly every policy or programming move is fraught with risks and tensions. Thus, it is that every UN agency and INGO, and every donor (all of this is not unique to UNHCR) is constantly walking on eggshells: afraid that the slightest misstep would cause offence or break a fragile equilibrium.

# 4 Protection

## Legal policies and support

**Finding 25.** **Across all sectors covered by this evaluation, UNHCR has provided policy advice and technical support to Government that has been key to the protection and well-being of Syrian Refugees in Turkey**

It was observed in the Context Chapter that Turkey provides an extraordinarily welcome policy and legal environment for refugees, all the more extraordinary considering that the key recent legal changes were approved during a period of political transition and in the midst of a mass refugee influx.   While the bulk of the recognition for this achievement must go to the government and people of Turkey, there is no doubt that UNHCR's patient policy advice and technical support were instrumental both in the framing of this legislation,[62]and in the building of the national institutions to implement it.  Although many Syrians remain in very difficult circumstances that need to be better addressed, as cited elsewhere in this report one of the most impressive features of Turkey situation is the high number of refugees in focus groups and surveys who state that they are satisfied with the conditions of their lives and with their ability to live, work and find protection in Turkey.

**Finding 26.** **The Policy Development Unit is key to the entire operation, and from a value for money perspective is one of the most important investments UNHCR has made in Turkey**

One of the most strategic and efficient work units in the entire Turkey operation is the **Policy Development Unit,** a group of 15 staff within Protection that specialises in providing technical support, legal advice, interpreters and a substantial volume of training to the Government of Turkey.  There was material support as well that was instrumental for building the Government's registration system and building up the new Government Agency DGMM, including 34 purpose-built mobile registration/coordination vehicles, ICT hardware and software, and interpreters - all for a combined cost of over $24 million.

## Registration

The story of Syrian refugee registration in Turkey is convoluted. The very first Syrian arrivals in April and May 2011 were registered by UNHCR in the same way that UNHCR registers non-Syrians.[63]Quite quickly, after it was determined that Syrians would be treated as "guests" and housed in "temporary

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[62] ILO also needs to be recognised for their efforts with UNHCR on the breakthrough work permit regulations of early 2016

[63] Even today, UNHCR has responsibility for registering non-Syrian refugees, although that workload has increased so much in the last three years that this is now handled as a two-step process with a wide-reaching IP ASAM handling pre-registration

accommodation centres", AFAD took over registration – but this was limited to the basic information required for determining family size, allocation of temporary housing and eligibility for camp supplies. AFAD issued "camp cards" with no legal standing, although some refugees initially thought these were government ID cards. Already at this early point, UNHCR was advocating for full formal registration including vulnerability assessment, but the Government assumption was that Syrians were only in Turkey temporarily, and the policy was to treat them as guests (see Context chapter for more details).

By 2013 the number of Syrians outside camps was so significant that the Government decided to begin registration – and was immediately faced with the challenge that Syrians, who had hitherto enjoyed freedom of movement, were dispersed across the country. The task of initial registration was divided between AFAD for camps, and outside camps to the Directorate General of Security of the Ministry of the Interior. Initial registration by AFAD was done using a software COGENT that has a maximum capacity of 1 million records, and registration outside camps was done by the Foreigner's Police using their own software

> ### *The strategic value of interpreters*
>
> By providing interpreters, UNHCR (a) accelerated the registration process, (b) created goodwill with Government, (c) was able to do some quality control on registration, and also (d) obtained intelligence on the nature of the refugee population that could be used by UNHCR for planning.

POLNET that is used for registering foreigners, visitors and also criminals. While waiting for the official process to catch up, some municipalities and NNGOs undertook their own unofficial registration using a variety of local methods.

Thus, in 2013 there were three different registration systems in place. None of these systems were capturing vulnerability data – the sort of data that could be used for targeting, for programme planning (by governments or humanitarian agencies) or for resettlement screening**.**

| **Finding 27.** | **The sharp increase in Syrian refugee numbers in 2014 was mostly due to the rate of registration of refugees already in country, not the rate of new arrivals** |

Meanwhile, DGMM was in the process of being created based on the 2013 Law on Foreigners and International Protection (LFIP) that came into force in April 2014. From 2014 DGMM started to take over responsibility for registration, and in mid-2014 launched a big push to register as many as possible of the out of camp Syrians by the end of the year – which is the primary reason why the Syrian population numbers peaked sharply in late 2014 – this was the result of accelerated registration not accelerated arrivals.

For this big push, DGMM initially agreed with UNHCR's recommendations to include vulnerability profiling data, but as their capacity was still being built, and there was a critical shortage of both interpreters and time, compounded by the broad geographic distribution of Syrians, the Government decided to continue with a limited biodata registration mainly using police registration through POLNET, and DGMM registration in some urban centres where DGMM had established an office, and using mobile registration units provided by UNHCR.[64]

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[64] UNHCR purchased 23 Mobile Registration Units for AFAD and 11 for DGMM

**Finding 28.     UNHCR has significantly supported the Government of Turkey to build the largest refugee basic bio-data registration system in the world**

In early 2015, with considerable preparatory support from UNHCR in 2014, DGMM launched a third software module for registration called GOCNET, which allowed the amalgamation of the POLNET and COGENT databases and permitted the identification of double-registrations.  This system is now stable. There was an important change in all the ID numbers issued in order to remove ambiguity about Syrian access to services, and although there are backlogs in some locations at some periods, for the most part the **Government is now able to keep up with new registrations, location transfers and changes in civil status** for example due to marriages, although there is **still a major gap in the civil registration of newborns** resulting mainly from a lack of awareness on the part of refugees of the need to obtain civil registration from DGMM in addition to the birth registration provided by medical authorities.

There are three main reasons for new registrations: (a) there are still new arrivals into Turkey from Syria: two official land border crossings remain open to Syrians who meet specific criteria (see discussion below), and irregular crossings continue with and without the assistance of people smugglers.  Through the TPR, Turkey has very importantly maintained a provision that Syrians registering within a certain period after arrival will not be penalised for arriving irregularly; (b) there are an unknown number of Syrians in Turkey who have chosen not to register until now, sometimes because they simply do not know how to register or the value of registering, or they were born in Turkey, or they are afraid to approach the Foreigner's Police (reportedly the case for some women and unaccompanied minors), or they want to keep open the option of traveling on to Europe and fear that registration in Turkey will expose them to being sent back to Turkey under a readmission agreement;[65] and (c) there are many Syrians in Turkey who entered with a different status and using their passports, and who now are unable to renew their passports and/or who desire to "convert" their status from student or visitor or resident to temporary protection.

There is no doubt that UNHCR's material assistance (registration vehicles, computer hardware and software) and technical assistance (advice, training and interpreters) was instrumental in enabling the Government to register over 2.5 million refugees in such a short period (mostly in 24 months), and in enabling the Government to merge different datasets into the single consolidated GOCNET.

**Recommendation 8.     UNHCR Turkey should continue to provide technical (including interpreter) support to DGMM for continuous improvement and implementation of Syrian registration**

**Finding 29.     From a protection viewpoint, it was better to do a light but universal registration than a slower and more comprehensive registration**

NGOs, Turkish Government Departments, Turkish municipalities and Turkish academics have all criticised the Government for not having captured vulnerability data that would allow better planning and targeting, despite UNHCR's strong recommendations and multiple offers of support.  However, after weighing up the protection risks of a large number of Syrian being unregistered for longer as a result of a

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[65]Assuming that the exit route to Europe will become more difficult in 2016 onwards, it can also be expected that a significant number of Syrians who are in Turkey "in transit" to Europe will now find themselves "stuck" in Turkey, at which point they are likely to register when they see the benefits of doing so

prolonged but deeper registration process,[66] against the protection benefits of refugees having a summary registration below UNHCR standards but that also provides a photo ID and a number that together immediately provide Syrians with access to government services, the evaluation team **came to the conclusion that the rapid and light registration approach used (by necessity) by the Turkish authorities was the better approach from an overall protection standpoint**. Now the first round is complete, the priority should be (and indeed is) to validate the initial registration and include vulnerability data on the next round.

The challenge facing all stakeholders as they consider deepening their vulnerability assessment and service outreach in the coming years, is that there are four groups of people who are at risk of remaining beyond the boundaries of conventional vulnerability assessment: (a) Syrians in small and remote communities,[67] (b) Syrians who are not in their provinces of registration (usually to find work),[68] (c) Syrians who resist registration or who are socially excluded even after registration (for example the Dom minority, LGBTI persons, Syrian Yazidis), and (d) Syrians who are registered but who are underreporting their vulnerabilities: most obviously the case of domestic violence, family-sanctioned child labour, and early or plural marriage. These "hard to reach" groups of Syrians have been on the radar screen of UNHCR and other stakeholders since the beginning, but finding ways to identify and then support them has remained a constant challenge.

## Access to territory/asylum: reception conditions

### *Reception conditions*

In the Turkey context, "reception services" include a very wide range of places and processes where Syrian refugees transact with Government authorities and with their supporting agencies, including UNHCR. The evaluation team (indeed UNHCR itself) was not permitted or not able to assess all of these locations, and cannot provide a confident overall assessment of the adequacy of reception conditions. However, third party observers, media reports, agency reports and our limited observation provide the following assessment of reception conditions.

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[66] An approximate calculation based on registration benchmarks in Lebanon and Jordan is that registering 2,500,000 people with average family size of 4 and only capturing basic biodata (level 2) through a translator takes 390 person-years – not considering the logistics of doing this in 81 cities across Turkey. This is a task that UNHCR could not possibly have achieved in two years using its normal methodology, and probably not in four years.

[67] The DGMM website as of mid-March 2016 listed 34 provinces where there are fewer than 1,000 Syrian refugees registered

[68] It was reported that in the agricultural season up to 500,000 Syrians many of Kurdish background leave their camps and communities to spend 6-8 months working a cycle of season agriculture labour, following the harvest of different crops in several locations across Eastern Turkey

## *Reception at the border*

| **Finding 30.** | **Instances of mass influx were well-managed by UNHCR, Government and partners during the period under review** |
|---|---|

Those Syrians who were and still are allowed to cross the border into Turkey without passports arrived in small numbers and were reportedly well-received.[69]Because since early 2015 the criteria for official entry are effectively limited to medical emergencies, "humanitarian cases" and family reunion cases,[70] the point of entry also becomes a moment of determination whether the admitted Syrian will be referred to a particular service provider or transferred to a particular

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>
> *Despite the fantastic efforts of the Turkish Government, the sheer volume of this influx has left some gaps in service provision and in ensuring that women, men, boys and girls are safe within the sites which have been set up. The sites used are collective centres, with schools, mosques and other public spaces being converted into temporary shelters. Living in close quarters, with no gender safe spaces or dignified changing areas, is a struggle – especially for women.*
>
> *– NGO worker involved in Kobane influx*
>
> ❞



Syrian refugees being admitted at Akçakale in June 2015.  Note the UNHCR-supplied mobile registration vehicle in the background.  (UNHCR photo)

location or a camp.  In cases of sudden mass influx, notably Kobane in September 2014 and Akçakale in June 2015, by all accounts a full multi-agency screening, registration and service referral machinery was set up at the border with the cooperation of several Government agencies, several UN agencies, the TRC and NGOs. After the initial registration and reception process at the border, Kobane influx refugees were housed temporarily in a range of existing ad hoc sites, where there were reports of overcrowding and inadequate safe WASH facilities for women and girls, as well as some increased risk of SGBV due to close proximity.

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[69] The reported instances of involuntary return or refusal of entry will be discussed separately in the next section

[70] The Government policy remains that the border is 'open' and we were not able to find a public policy document or statement listing these criteria for entry

## *Reception in camps*

**Finding 31.**     **Refugee reception services in Turkey are varied. Reception conditions in camps are considered to be good, but reception services for refugees in urban and non-camp rural areas are limited**

Those Syrians referred to Turkey's 26 "temporary accommodation centres" are welcomed into what have been widely described as the best equipped refugee camps in the world.  They were reportedly built to higher than Sphere standards with some technical advice from UNHCR, and are complete with clinics, schools, markets, electricity, cooked meals and the infamous washing machines. Even though some of the five-year-old containers and many of the tents and mattresses are ready for replacement, and the Government has reportedly cut back some services to a more sustainable level, **in material terms these are probably still the best**

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> *As UNHCR, I am pleased with what I have seen at the camps. The international community needs to be in solidarity for maintaining these high standards and implementing them everywhere.*
>
> *– UN High Commissioner for Refugees[71]*
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> "

**refugee camps in the world.[72]But they are nevertheless still camps.**  With the exception of refugees who are under de facto administrative detention after being sent to camps under a 25 July 2014 directive because they have infringed some regulation or committed a crime outside the camps, Syrians can obtain passes to enter and leave the camp, and if they have sufficient resources and justification they can leave the camps indefinitely. In a heartening example of cross-border pragmatism, approximately 80,000 Syrian refugees were granted permits to return temporarily to Syria to visit relatives during the main Muslim religious festival season, after which they were readmitted to Turkey and returned to their places in camps.

Initially UNHCR had no access to camps – which were set up, financed and managed by AFAD with the support of TRC. From the moment UNHCR was asked to provide material assistance and started delivering cooking kits, tents, mattresses and blankets, UNHCR began to get access, and indeed it has been convincingly argued that **one of the most important benefits of the major CRI distributions of 2013 and 2014 was that they provided UNHCR with access to the camps and a protection foothold**.  Since 2013 UNHCR has visited camps regularly,[73] and through these 4-5 hour visits (initially daily and now twice a week), has been able to provide protection presence and build up mechanisms of camp governance, vulnerability assessment and counselling.[74]

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[71]Syrian Guests in Turkey, 2014, Prime Ministry Disaster and Emergency Management Presidency (AFAD), pp. 95; 98

[72] Since it is reported that few Syrians are detained in removal or detention centres, we have not considered the conditions of those centres in this study

[73] Access is still not perfect – as it was reported that UNHCR field staff currently do not have access to residential areas of two camps despite repeated requests to unblock this issue. The reason access is denied is reportedly due to personalities, although it was also suggested that denial of access might be a response to UNHCR's repeated expression of concern about alleged sexual exploitation in these camps during 2013-2014

[74] One problem faced by UNHCR is a constant rotation of camp management staff such that UNHCR need to provide briefings and training repeatedly: a regular AFAD camp manager training programme might help provide some consistency

Is this enough? Certainly not. The ideal would be a permanent UNHCR presence in every one of the 26 camps. But given the number of UNHCR vehicles and staff available, the large number of camps and their geographic distribution across an area of South Eastern Turkey about the size of Portugal, and given the growing number of out of camp populations and their increased vulnerabilities in relation to camp populations, **a twice weekly visit was probably the most that UNHCR could afford**.

Should UNHCR leave the camps and focus exclusively on the urban populations? Certainly not either. Camps are still camps: dense social and political environments with their own stressors and problems, and attendant risks of domestic tension and violence. Questions that are challenging to raise culturally in Turkey are all the more difficult to raise in a camp setting where there is clear and established Government control, and it is in camps that UNHCR often has the most difficulty raising awareness of domestic violence, SGBV, child labour and especially early marriage.[75]

There is however significant room for improvement in how periodic camp visits are conducted. During the period under review, despite early requests by UNHCR staff, UNHCR has been unable to secure a permanent office space where UNHCR visiting field staff can post regular office hours and thereby ensure that refugees have predictable access to privately consult a UNHCR staff member. In the absence of this, UNHCR tend staff to monitor by driving around the camp, in the expectation that refugees who need to meet with UNHCR can stop and approach the car. The evaluation team agrees with field staff thatthis lack of a predictable time and place for refugees to meet with UNHCR greatly curtails the possibility of a private protection-related consultation, and limits the effectiveness of UNHCR camp visits.[76]

**Recommendation 9.**      **UNHCR Turkey should negotiate with AFAD to obtain a private office space in each temporary accommodation centre, where UNHCR field staff can hold regular office hours and meet confidentially with refugees in order to monitor welfare concerns**

The exception to the above discussion of UNHCR access to camps is a small number of informal refugee camps, mainly in the southeastern and eastern regions of Turkey, that have for the most part been set up by municipal authorities and outside the AFAD-managed camp system. Some of these were opened temporarily to accommodate the Kobane influx of 200,000 Syrians of Kurdish background, 120,000 of whom returned to Syria as soon as they felt conditions were favourable, and others have over time accommodated a mix of Iraqis and Syrians. At the moment, it is thought that these informal camps are empty or nearly empty, but **they remain an area of protection vulnerability because of their informal nature**, and because UNHCR staff are not able to officially monitor their reception conditions. In these regions, it remains vitally important that UNHCR field staff maintain steady contact and warm relations with provincial and municipal authorities, so that UNHCR can seek informal access when necessary.

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[75] According to UNHCR field staff, challenging situations have arisen in which MoFSP social workers and camp management do not agree on the same course of action: cases were cited of domestic violence or child marriage in which camp social workers felt that the police should be involved, but camp management preferred not to have the local police involved, and rather handle the matter themselves. There were also reports of camp managers assisting in making early marriage arrangements

[76] In Q 9 of the online survey (see annexe) respondents feel that UNHCR protection in camps is weaker than UNHCR assistance in camps

## *Reception in Community centres*

**Finding 32.     Refugees are well received and supported by community centres, but their coverage is not and never could be sufficient**

Many Syrian refugees, sometimes deliberately if they crossed into Turkey irregularly, first contact the protection system of Turkey by walking in the door of an NGO office or Community centre.  Initially UNHCR, and now increasingly DGMM and TRC, have worked hard to develop a more **standardised system in Community centres for registration counselling to unregistered Syrians,** and in some cases Syrians who urgently need access to medical services can have their registration processing accelerated through an advocacy intervention of the relevant organisation.  The Community centres are safe places with well trained staff, and on the whole, provide a good mechanism for reception and eventually support or referral for vulnerable cases.  The problem is that even **these centres are only able to reach a fraction of the Syrian out of camp population, maybe 10%.**

## *Reception at ASAM offices*

**Finding 33.     ASAM field offices are vital to monitoring and promoting protection for up to 50% of the refugee population who reside outside the reach of UNHCR sub-offices, camps and community centres**

The evaluation team was able to visit two urban centres where there is no UNHCR presence and no community centre, and where the only presence linked to the UN refugee machinery was a satellite office of ASAM.  UNHCR has supported ASAM to create a network of approximately 40 offices in most Syrian-affected parts of the country, and effectively these satellite offices serve as the remote sensing antennae for UNHCR as well as a local base from which UNHCR can develop relationships with local authorities. If refugees walk in the door of an ASAM office, we are confident that they will be given good advice, referred to the appropriate Turkish authorities, and assisted if they have an urgent need.  This **network of ASAM offices is vital to the ability of UNHCR to monitor reception conditions in remote areas of the country**, and to permit the scaling-up of UNHCR engagement in the event of an incident or emergency.

## *Reception at Government institutions*

Through our very limited and cursory observation of line ministry and municipal offices in regions without a UNHCR office, we obtained the initial impression that **Turkish institutions are welcoming to Syrian refugees** (for example local police offices doing registration, local PDMM offices handling file updates, local hospitals, local schools).  However we were informed that the level of service provided to Syrian refugees is uneven due to two main factors (a) despite the distribution of clear Government circulars governing reception of Syrians, **not all local officials are aware of the prevailing regulations and directives** (for example because of staff rotation), and (b) even when they are aware, **not all officials have the resources to fulfil the requirements** set out in the directives (for example, not all local police offices have the time or equipment to keep up with the pace of registration, not all schools have enough classroom space for Syrian children, and interpreter services are in short supply everywhere).

## *Access to the territory by Syrian asylum seekers*

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| **Finding 34.** | **UNHCR has to some extent been able to verify access to territory by Syrian asylum seekers; but that access and UNHCR's ability to observe it have both become more limited over time** |

UNHCR does not have a permanent presence on the border with Syria or at other border points such as Istanbul's two international airports, although UNHCR does have access to visit borders. Because UNHCR does not have sufficient staff for permanent border monitoring, nor the permission to set up a permanent presence there, for information on border problems and instances of denial of access UNHCR generally relies on reports from IPs and NGOs present in border areas, and intervenes when they hear of a case or a situation that raises protection concerns.

The admission regime from Syria into Turkey has become the subject of considerable international scrutiny, particularly late in 2015. **During the period under review, January 2014 to June 2015, there was a definite and progressive hardening of the land border**. Early in 2014 there were at least six land crossings open all along the border, and Syrians were able to enter without documentation. If they entered in a regular way, they were referred to a camp or to an urban centre to reunite with family, where they could register officially either through the AFAD channel or the foreigner's police channel described earlier. If they entered irregularly, they were (and still are) able to register with the local authorities without penalty, as long as they do so within a prescribed time period.

The first time the borders started to harden was at the time of the Kobane influx in September 2014. Faced with 200,000 people seeking entry *en masse*, **the Government started to manage the arrivals**, ensuring that the crossing was orderly, that people were screened for vulnerabilities, and started to screen arrivals for possible criminals and terrorists. At that time 200,000 Syrians were allowed to enter Turkey, one of the world's largest sudden refugee influxes of recent years, and eventually 126,000 of them returned to Syria.

In January 2015, the Government removed the visa waiver for Syrians entering by air,[77] and thereby slowed the flow into Turkey of Syrians who were previously in Jordan and Lebanon, some of whom were flying to Turkey and from there making the sea crossing to Greece. **From this point onward we can characterise the border as strictly managed**. And then in March 2015, the Government introduced a **very strict management regime** and closed all but two land border crossings: Hatay and Kilis,[78] admitting only people with emergency medical or humanitarian needs, or for family reunion.[79]

During the period being evaluated there were several alleged instances of ill treatment, push-backs, deaths as a result of live ammunition being used at irregular crossing points, and unlawful detention. Most

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[77] An exemption is in place for Syrians entering by land

[78] Technically the crossing point at Suruc opposite Kobane is still open for returns to Syria. Note also that several crossing points are open for cross-border humanitarian operations, but not for refugee entry

[79] As a demonstration of the delicate issues around Turkey's Syrian border, as early as 2013 the European Union was exhorting Turkey to respect principles of non-refoulement, and at the same time formally requiring stricter management of the Turkey-Syria border " … Carry out adequate border checks and border surveillance along all the borders of the country, especially along the borders with EU member states, in such a manner that it will cause a significant and sustained reduction of the number of persons managing to illegally cross the Turkish borders either for entering or for exiting Turkey". European Commission, Roadmap towards a visa-free regime with Turkey

of the third party and media reports on such denial of access derive from the December 2014 Amnesty International Report: <u>Struggling to Survive: Refugees from Syria in Turkey</u>, which also highlighted a particular problem of access on the part of Palestinians from Syria whose documents are not recognised by Turkey and who therefore must risk irregular entry. Determining whether or not these allegations are well-founded is beyond the scope of this evaluation. However, regarding the extent to which UNHCR verified access to territory and took action as a result of allegations such as those of AI, what we observed is that, **when allegations of this sort seemed credible and concerned refugee protection anywhere in the country including at borders, UNHCR informed the evaluation team that it has done what it could and still makes urgent and appropriate representations to the Government** authorities in person and writing. The fact that UNHCR chooses not to "go public" when dramatic protection allegations are made is a judgement call on the part of the Representative that seems reasonable in the highly sensitive political context in which UNHCR operates in Turkey. The specific question of voluntary or involuntary returns is discussed in the following section of the report.

| Finding 35. | With UNHCR advice and support, the Government set standards for camps that met or exceeded SPHERE standards, but the evaluation team could not observe whether they were met in practice |
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## Protection and solutions strategy: durable solutions

### UNHCR's Protection Strategy[80]

UNHCR did not have a fully developed standalone "Protection and Solutions Strategy" in the 2014-2015 period, and argues that the situation was evolving so fast that a multi-year strategy would have needed constant revision. But UNHCR did have elements of a Protection Strategy, including a June 2014 internal policy paper that outlined a comprehensive set of protection priorities, a series of policy notes on the protection of urban (non-camp) populations leading up to a March 2015 Draft Urban Strategy, and specific strategies for resettlement and Refugee Status Determination. Most importantly, the overall approach to protection in any given year is described in great detail in the Country Operations Plan (COP).

| Finding 36. | UNHCR's overall protection approach was appropriate, but too cautious on issues such as early marriage, child labour and domestic violence that that are culturally loaded and difficult to tackle |
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Was UNHCR's protection approach appropriate? On the whole, yes. The focus on legislation and building Government and partner capacity including for registration was absolutely the most strategic investment and helped secure one of the most favourable asylum regimes in the world.[81]

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[80] At the conclusion of this chapter the evaluation team provides an overarching recommendation on analyses, strategies and action plans that proposes a linked set of framing documents to guide the operation's protection work in the future. This recommendation seeks to minimise the amount of new work, link as much existing work as possible, and ensure that analysis and evidence inform strategies, that in turn guide action

[81] A piece of unfinished business regarding the TPR and its regulations is to include explicit reference to the roles and responsibilities of municipal governments, who are providing an increasing proportion of the support to Syrians but without an unambiguous mandate to do so

Regarding the balance between protection monitoring in camps vs urban areas, the operation was perhaps a little slow to shift resources from camps to urban areas and still has difficulty reaching some regions (see above), but has clearly made the transition and is now taking the logical next step towards community-based protection, outreach from the platforms of community centres, and monitoring through area-based multi-functional teams. **Where the evaluation team believes the operation still needs to pay more attention is on those hard-to-tackle issues that are problematic domestically in Turkey and not just for refugees, namely child protection (especially child labour, early marriage and institutionalisation of unaccompanied minors), domestic and sexual violence, and human trafficking (see sections on SGBV and Child Protection below).**

## *Voluntary Repatriation*

Voluntary repatriation from Turkey to Syria has had an interesting trajectory. In the initial years of the influx, when it was assumed by the Government that Syrian refugees were truly temporary, the Government reported several hundred thousand voluntary returns to Syria, as seen in this image taken from the April 2014 UNHCR Monthly Report (note the data source is AFAD).[82]

*Figure 4.1      In 2013/2014 Syrian refugees flowed back and forth across the Syrian border*
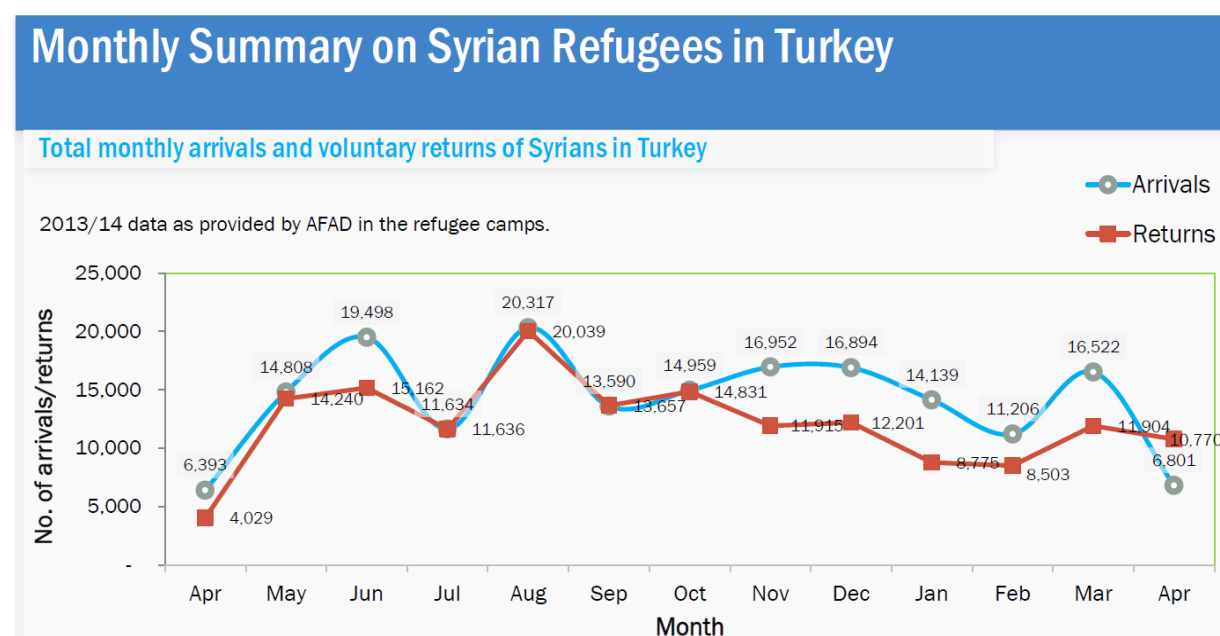


It is not entirely clear what was happening during this period, but it seems likely that what is being recorded here are mainly arrivals and departures <u>from camps</u>, and the departures would have included some Syrians moving to urban areas, some who were returning temporarily to Syria, and others who were returning permanently to Syria. It is important to recall that in this early period Syrians were regarded as guests, the border with Syria was open to two-way flow without much regulation, and there is known to have been a significant amount of back-and-forth movement as families visited, government employees collected their monthly salaries, and business owners checked on their farms and their property.

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[82] Confirmed by various Government of Turkey reports

In 2014, with the entry into force of the TPR, a legal framework for Syrian voluntary repatriation was put in place. UNHCR does not have an identified role in repatriation within the TPR itself, but the law permits the Government to cooperate with international organisations and civil society organisations. Perhaps reflecting the optimistic mood of the moment, UNHCR expected that observation of voluntary repatriation would be a major activity in 2014, and included this as one of the eight protection performance indicators in the RRP6, recording the observation of 6,712 of a targeted 41,300 interviews.

**Finding 37.     UNHCR is careful only to endorse voluntary repatriation that is truly voluntary**

However, during the course of 2014 the voluntary repatriation context changed in two important ways. The first is that the cross-border ebb and flow seemed to decrease, with more flow into Turkey and less ebb back to Syria.[83] Secondly, the Government enacted a regulation in June 2014 that permitted the authorities to refer to reception centres "those among the Syrian foreigners who are involved in commission of crimes, who are considered a threat to public order and public security due to other reasons, and those who are begging and living in the streets despite warnings."[84] With such a broad scope, this regulation permitted the authorities to round up undesirables, in particular those causing a public nuisance in cities and tourist regions, and offer them two choices: to return to Syria or to be relocated to closed camps.

At this point UNHCR drew a line in the sand, and thenceforth **declined to observe the voluntary repatriation interviews of Syrians who were involuntarily in camps**. Still today, UNHCR declines to observe interviews in these conditions and does not endorse those repatriations or have reliable estimates of their numbers.[85] **UNHCR does continue to observe voluntary repatriation interviews for persons who seem to be expressing an unfettered choice**, and internally reported observing 4,703 Syrian returnee interviews in 2015. Thus, the current position of UNHCR on voluntary return is made up of two components – on the one hand UNHCR clearly believes and publicly states that they do not encourage any return to Syria because the conditions there are not safe for returnees, and on the other hand they do agree to observe voluntary repatriation interviews for a few thousand Syrians each year whose requests to return in an organised way seem to be voluntary. In either case, in the short to medium term, **voluntary repatriation is not a significant durable solution for Syrians in Turkey.**

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> *It takes two to tango. We need to work with the government, we need to respect them.*
>
> *– UNHCR Protection officer*
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> "

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[83] We were not able to find published Government figures for voluntary repatriation to Syria for all of 2014.  In 2014 the major cross-border event was the arrival from Kobane of 200,000 mainly Kurdish Syrians, which included the involuntary return of approximately 120 Syrians in conjunction with that influx (US State Department Annual Human Rights Report 2014), and the voluntary return of about 126,000 within a few months

[84] Government circular, June 2014

[85] The numbers at least until June 2015 are not thought to be substantial, and even Amnesty International stated in late 2015 that "Up until September this year, the main human rights concerns facing refugees in Turkey have not included unlawful detention and deportation", but Amnesty International goes on in that report Europe's Gatekeeper to predict that involuntary returns would increase in 2016 as a consequence of measures agreed with Europe to discourage the Aegean Sea migration

## *Long-term stay in Turkey*

| Finding 38. | Durable solutions are still a distant prospect for refugees in Turkey, and the default path of longer stay in Turkey with temporary status but most economic and social rights seems the most likely |
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There is no doubt that the long term well-being and security of over 2,700,000 Syrians in Turkey is thanks to the considerable moral and material support from the Government and people of Turkey.  The international community has contributed, and more than the Government usually gives them credit for, but that cannot detract from the unprecedented contribution of Turkey itself. Whether the welcome is extended and deepened will also depend upon the Government and people of Turkey.

In this, the Government has been ably supported by many stakeholders and notably UNHCR, whose principal efforts regarding durable solutions have centred on helping the Government create the legislative and enabling policy environment that would provide Syrian refugees with access to social and economic rights in Turkey.  **UNHCR has contributed significantly to strengthening this conducive environment for Syrians to sustain themselves**, to adapt to a long-term stay in Turkey (called "harmonization" by the Government of Turkey), and ultimately to contribute to the social and economic development of Turkey. UNHCR's specific investments in education and community empowerment are the subject of subsequent chapters of this report and will not be covered here.

## *Resettlement*

Before the Syrian influx, Turkey already housed UNHCR's second-largest resettlement programme in the world.[86]  This stems from the conditions under which Turkey ratified the UN Refugee Convention and from Turkish legislation, which essentially consider non-European asylum seekers to be **conditional refugees, allowed to stay in Turkey and to benefit from Turkish social services on the condition that they are first determined to be refugees (a process currently managed by UNHCR) and then resettled**.  At the beginning of 2011, Turkey housed 16,750 persons of concern to UNHCR, about half of whom were deemed refugees (mostly Iraqi) while the remainder were asylum seekers awaiting status determination (mostly Iranians and Afghans). In 2010, 6,800 cases were submitted for resettlement and 5,300 departed – so the situation at the start of 2011 was more or less in equilibrium between low arrivals and high rates of resettlement departure.

Fast forward to 2015, and the scenario is entirely changed.  First of all, the number of non-European and non-Syrian asylum seekers in Turkey has risen to over 250,000, mostly Iraqis and Afghans.  And that is not counting those who are in Turkey "in transit" to Europe and who have not started the asylum process in Turkey, or those who are expected to be returned from Greece. Despite valiant efforts, the **UNHCR office in Turkey has been overtaken by the surge in the caseload, which is colliding with the painstaking and labour-intensive triple processes of registration, refugee status determination and resettlement processing, to create an immense backlog.** The 10,191 non-Syrian resettlement submissions made from Turkey in 2015 were a huge achievement, but only a drop in a bucket that keeps on filling.

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[86]  In terms of submissions, Turkey was second in the world in 2012 and 2013, and first in 2014 and 2015 (UNHCR data http://www.unhcr.org/statistics/unhcrstats/573b8a4b4/resettlement-statistical-database-portal.html)

Regarding Syrians, resettlement was not even considered until 2014.[87]

*Figure 4.2      Resettlement of Syrian refugees from Turkey was limited in 2014 and 2015*
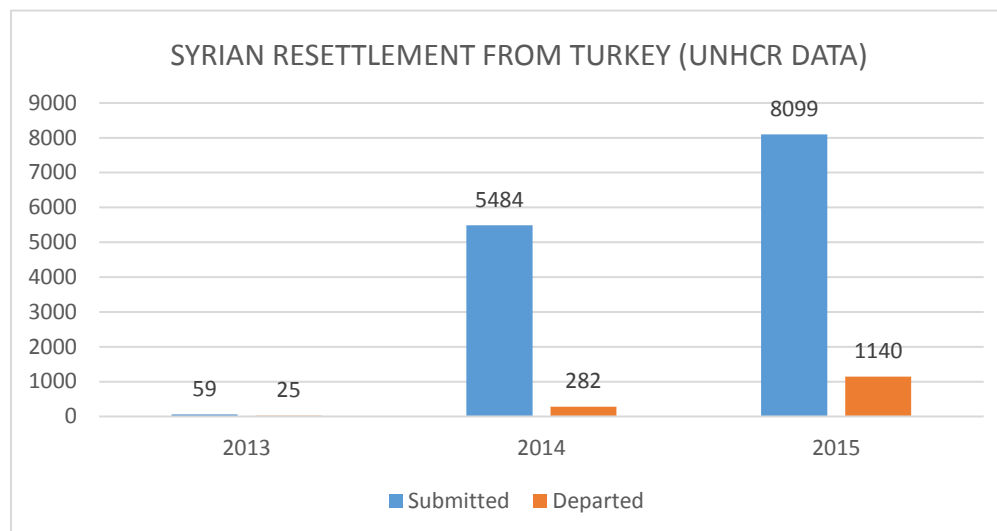


The big difference between processing Syrians and non-Syrians from Turkey is that, for non-Syrians, UNHCR completely manages the registration, RSD and resettlement processing.  For Syrians, the Government manages the registration (at a level of detail and accuracy that is below UNHCR's standards, as discussed above) and does not provide registration data to UNHCR. Furthermore, there is no refugee status determination because under the TPR Syrians are not considered by the Government of Turkey to be "refugees". In this uncomfortable situation, and recognising the genuine protection need for some particularly vulnerable Syrians to be put into a resettlement process, in 2014 UNHCR started to gather names for resettlement from its main NNGO partners who were operating community centres providing counselling to Syrians. In an intense effort starting in August 2014, 5,484 cases were prepared and submitted to the Government of Turkey for exit permits – which were denied.

The refusal of exit permits resulted from a misunderstanding between UNHCR and DGMM: UNHCR had not prepared the way with DGMM by explaining the reasons and the process they were following to select these cases, and DGMM was under the impression that these initial cases were cherry-picked and did not meet the agreed vulnerability criteria. In the end the misunderstanding was resolved, UNHCR agreed to take referrals from the Government,[88] and most of the frozen cases were released for departure.[89]But unfortunately the damage was already done.  As soon as the initial and exhausting effort from UNHCR was stalled, and processing stopped almost entirely from January to March 2015, most of the resettlement receiving countries concluded that resettlement from Turkey was going to be difficult and slow, and

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[87] UNHCR's 2014 Global Resettlement Needs report (drafted in mid-2013) anticipates a resettlement target of 8,475 refugees, all non-Syrian, and in the narrative, opens the door to Syrians being resettled in future years

[88] The referral system is still not working smoothly as the Government itself lacks the data and capacity to identify Syrian refugees who would qualify for priority resettlement, but everyone is working on practical solutions and the Syrian resettlement pipeline is back up and working again

[89] The difference between numbers released for departure and actual departures mainly stems from screening and processing bottlenecks on the side of some resettlement receiving countries, that are expected to be resolved in 2016

shifted their attention and quotas to other countries in the region from which resettlement processing was perceived to be easier.  From summer 2015 - with the refocusing of global attention on Turkey and a re-energised resettlement programme in Turkey based upon improved arrangements with the Government, **it is widely anticipated that resettlement quotas will return to Turkey in 2016, and that Turkey will become a major contributor to the global resettlement initiative for Syrians.**

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| **Finding 39.** | **Resettlement is important for maintaining protection space and demonstrating international solidarity, but it will not significantly reduce the Syrian refugee population in Turkey** |

**Will resettlement be the primary durable solution in this situation? No.** Resettlement will certainly help both Turkey and the Syrian refugees, and the more strategically it is used the better. But in the end, the demographic evidence is overwhelming. Even if UNHCR's resettlement procedures were drastically streamlined and the processing machinery in Turkey were massively bulked up to process 50,000 or even 100,000 cases a year, this would only keep pace with the natural growth in the refugee population (estimated by the Government to have increased by 159,000 over five years)[90] and the rate of new arrivals.

**Recommendation 10.    UNHCR Turkey should increase its resettlement efforts, but any additional spending on resettlement should not be at the expense of ensuring the protection of Syrians who are likely to be staying in Turkey for some time**

## Accountability to Affected Populations

Accountability to affected populations (AAP) can be understood as 'an active commitment by humanitarian actors and organizations to use power responsibly by taking account of, giving account to and being held to account by the people they seek to assist' (UNHCR Emergency Handbook). Operationally, AAP is implemented in UNHCR through its Age Gender and Diversity Mainstreaming (AGDM) policy, and through Community-Based Protection.

### *UNHCR participatory assessments*

The AGD approach introduced in 2004, and the AGD Mainstreaming Policy (2012), provide UNHCR staff and partners with guidance to work in a manner that is inclusive of all groups within a given population of concern.  The key operational elements of this approach are *"i) ensuring the active participation in UNHCR's work of diverse and representative groups of persons of concern, using the participatory assessment (PA) methodology and other tools; and ii) identifying, in conjunction with affected individuals and communities, areas where targeted actions are necessary to address inequalities and support the capacities and protection of groups at risk.*"[91]  According to UNHCR procedures, country operations should organise annual Participatory Assessment exercises to ensure that concerns and feedback from persons of concern are taken into account in UNHCR's annual programme planning.

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[90] And a conservative calculation of 2% crude birth rate in a population of 3 million yields 60,000/year

[91] Age, Gender and Diversity Approach, EC/63/SC/CRP.14

| **Finding 40.** | **UNHCR was slow to start participatory assessments of out of camp populations, but did this effectively from late 2014 onwards** |
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As far as the evaluation team can determine, in 2013 and 2014 UNHCR Turkey did not lead or coordinate any Participatory Assessments with Syrian refugees.[92] At the end of 2014, staff in the Gaziantep Community Services (CS) Unit who were concerned to better understand the evolving nature of the urban caseload organised their own focus groups during UNHCR's Campaign on 16 Days of Activism against SGBV, with emphasis on the topic of early marriage among Syrian refugees. The CS Unit organised twelve FGDs in Gaziantep, Hatay and Sanliurfa, through two UNHCR funded community centres and one community centre funded by an operational partner. This provided UNHCR with important feedback on the causes, consequences and potential solutions to issues of SGBV and early marriage, seen to be on the rise within the Syrian refugee community. Unfortunately, the recommendations and broad strategy generated by this assessment have not been fully implemented as part of UNHCR's programming.

| **Finding 41.** | **UNHCR Turkey used its consultations with refugees as a basis for re-orienting its strategies and programming in favour of the vast majority of refugees in urban areas** |
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In 2015, as the need to engage with the urban population became ever more pressing, UNHCR conducted two Participatory Assessments and included a range of partners. This extensive data gathering exercise on UNHCR's part eventually fed into UNHCR Turkey's 2016 planning, and informed the new Urban Strategy in the course of 2015.  The Participatory Assessment in March 2015 covered Syrians and non-Syrians, and mobilised 16 multifunctional teams to conduct 40 focus group discussions, 7 semi-structured interviews and 11 in-depth interviews in eight cities across Turkey.  The evaluation team was informed that the results of the participatory assessments were shared with national authorities and NGOs in order to inform their policy making and programming. UNHCR also enhanced the coherence of these assessments by contributing to participatory assessments conducted by other organizations and institutions, many of which aimed to cover the main protection gaps in Turkey including self-reliance, coping mechanisms, relations with the host country/host community, and prevalence of harmful traditional practices. Thus, by mid-2015, UNHCR Turkey can be seen assuming leadership on the question of refugee-centred assessment and data gathering, and putting this information to use in its own strategic planning and that of its partners.

UNHCR Turkey's Urban Strategy, prepared in spring 2015, demonstrates a strong commitment to incorporating the results of Participatory Assessment and consultation with persons of concern into its strategic approaches and programming for 2016.  UNHCR should be congratulated for this effort to re-orient its operations in order to expand its protection coverage and to incorporate the needs and perceptions of persons of concern.  According to the Urban Strategy document: "*This strategy aims to bring UNHCR's policies and activities on the protection of persons of concern in urban areas in line with UNHCR's global strategic objectives and policies, and aims to expand UNHCR Turkey's protection space through enhanced outreach. Based on the principles and policies of UNHCR,[93] and in assessment [sic] of*

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[92] Although reports suggest that AGD Participatory Assessments maybe have been carried out in 2013 with non-Syrians.

[93]Refugee Protection and Solutions in Urban Areas (2009); Implementation of UNHCR's Policy on Refugee Protection and Solutions in Urban Areas (2012); UNHCR Policy on Alternatives to Camps (2013); Livelihood Programming in UNHCR- Operational Guidelines (2012); UNHCR Tool for Participatory Assessment in Operations (2006); Handbook for Self-Reliance (2005); Urban Refugees, A Community-Based Approach (1996).

*the findings of participatory assessments conducted in 2015, this strategy outlines the objectives and activities for UNHCR Turkey in its policy and implementation on a broad range of issues including outreach, community-based protection, livelihoods and self-reliance.*"[94]

## *Community-Based Protection*

**Finding 42.     The community-based protection approach adopted in 2016 seems an efficient way of increasing protection coverage to remote populations**

As discussed earlier, it became evident over the course of 2014 that protection monitoring of Syrians needed to rebalance between the earlier focus on camps/border points to include out of camp populations.  The shifting of resources to out of camp populations continued throughout 2015, although it remained difficult to access rural populations and groups of Syrians in secondary and more remote cities.  At the same time, there was a transition in emphasis from case management to institutional capacity development.  The intention in 2016 is to embrace the principles and best practices of **Community-Based Protection and reorganise protection monitoring on an area basis with mobile multi-function teams working with both Syrian and non-Syrian refugees**.  This is a logical progression in light of the protracted nature of the Syrian caseload, which over time has evolved such that for practical purposes it can best be supported with assistance mechanisms[95] similar to those used for non-Syrians.

One important element of community-based protection is increasing Turkish institutional and public awareness of the special mental health and psycho-social needs of Syrian refugees as a specific cultural group.  Several UNHCR partners have documented the trauma experienced by refugees before leaving Syrian. In one example of a census done by TRC[96] "*60% of the participants expressed that they had lost at least one relative in the war with 90% of these were reported to be immediate family members. Furthermore, 70% of the participants expressed that they witnessed clashes, 11% expressed that they actively participated in the clashes. Due to these traumatic experiences, 60% of the refugees' state that they and their children live in constant fear and psychological breakdown.*"

**Finding 43.     UNHCR has enabled the design and delivery of more effective psycho-social services to Syrian refugees**

Within this context, the UNHCR and its partners have been working to try provide mental health and psycho-social support (MHPSS) framed in ways that are understanding of and acceptable to Syrian refugees.  According to one partner: "MHPSS services have been an important area supported by UNHCR. Turkish practitioners have a much more clinical approach, whereas UNHCR has helped to introduce approaches that include community-based methods, support groups and a range of activities that may make it easier for Syrians to receive the support they need." Among other initiatives, a good practice in MHPSS is that UNHCR regularly trains partners on appropriate responses and referral pathways for different case types, and in order to improve MHPSS services for Syrian refugees, commissioned a literature review and a study to provide MHPSS practitioners with insights into ways that Syrian refugees

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[94] UNHCR Turkey Urban Strategy, March 2015, p.1

[95] But not yet from a legal or registration point of view, due to the separation of temporary protection from conditional protection in the law

[96] TRC Community centre Project Needs Assessment Report, Report No 200, July 2015 p.18

express their suffering, depression and mental anguish, which might not otherwise be obvious to medical and mental health practitioners. IMC has been a strong implementing partner in the field of MHPSS.

## *Refugee feedback mechanisms*

**Finding 44.     Refugee feedback mechanisms are weak in Turkey, partly because the operating context discourages open criticism**

An important element of AAP are mechanisms to actively seek the views of affected populations to improve policy and practice in programming, and to ensure that feedback and complaints mechanisms are streamlined, appropriate and robust enough to deal with (communicate, receive, process, respond to and learn from) complaints about breaches in policy and stakeholder dissatisfaction.  Although we did learn of Government, UNHCR[97] and NGO "hotlines", as well as complaints boxes in camps and in community centres, and we saw some examples of both complaints and responses, this is generally an area of weakness in the Turkey operation.  Rather more important, there appear to be very few means whereby refugees can actively participate in the development of policies, plans and programmes that affect them.  To a large extent this is beyond UNHCR's control, as service delivery is in the hands of the Government, access to refugees is logistically challenging, there are real language barriers, and the prevailing management culture does not encourage participatory planning or public criticism. Furthermore, the evaluation team observed that in several locations, UNHCR's offices and operations are generally quite invisible and inaccessible to refugees in Turkey, and direct contact with UNHCR staff is highly restricted. If refugees were experiencing ill treatment, only a few of them would be likely to identify UNHCR as a recourse channel and access assistance.

Where Government, UNHCR and partners are somewhat more effective is in providing basic information to refugees through points of service (i.e. Community centres or DGMM regional offices) and via the internet.  For example, UNHCR's Turkey website provides the basic legal and services access information that Syrian refugees need, and a full set of FAQs, in Arabic.  UNHCR Turkey's Facebook page is another vehicle for transmitting information, but neither of these mechanisms is effective for listening to refugees or for dialogue.

*Figure 4.3     Example of a Frequently Asked Question on the UNHCR website[98]*

**Does UNHCR Turkey register Syrian refugees?**

UNHCR Turkey is not carrying out registration or refugee status determination for Syrians in Turkey, as their protection is ensured by the temporary protection regime. Syrian refugees are registered by the Turkish authorities. UNHCR however supports the Government and humanitarian partners in identifying vulnerable Syrian refugee s with specific protection needs who may require additional/complementary protection interventions. Individuals referred to UNHCR for a protection assessment may be contacted by a UNHCR staff for follow up. A protection assessment is meant to determine the most appropriate solution to your protection needs in the country of asylum. A protection assessment is not a registration process.

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[97] An estimated 15-20% of refugee emails to UNHCR receive an answer back, 15% for the phone calls: information from UNHCR Turkey

[98]Frequently Asked Questions, p. 8. The evaluation analyzed the FAQ document in English and has no opinion about the Arabic nor the Turkish translations which are available on the same website.

## Child Protection

**Finding 45. Partly due to lack of access to education, the most serious protection problems facing Syrian refugee children in Turkey are child labour and early marriage**

During the period under review, UNHCR continued with a case management approach to child protection, in particular identifying and supporting Unaccompanied and Separated Minors (UASMs) in camps and identified through community centres, as well as those picked up by police in the street, and has attempted to conduct Best Interest Determinations whenever UNHCR is aware of UASM specific cases and has access. This task has however been difficult because data on UASMs is not available or not provided to UNHCR, and despite systematic objections from UNHCR, the Turkish authorities at different levels of Government seem to prefer to institutionalise UASMs either in government orphanages or in children's sections of camps, or sometimes in detention centres (particularly in the context of the 25 July 2014 regulation to prohibit begging). A key UNHCR support has been the provision of assistance in registration of UASMs as well as translation services for Turkish state institutions that receive them. While the situation of UASMs remains a serious concern for UNHCR and continues to be the subject of policy advice, advocacy and training, it can be argued that the more serious systemic protections problem facing Syrian children are the high rate of Post-Traumatic Stress Disorder among Syrian refugee children and youth in Turkey, and **family-sanctioned child exploitation in the forms of child labour or early marriage.**

Regarding PTSD, a 2013 study by Bahcesehir University in Turkey was among the first to document the extremely high rates of PTSD among Syrian refugee girls and boys living in Southeast Turkey. According to this study, nearly half (45%) of Syrian refugee children experienced PTSD symptoms-more than 10 times the rate observed in other children around the world.[99] Thus, treatment for PTSD and provision of community-based mental health services adapted to the needs of Syrian refugee children and youth in Turkey must be considered as a protection priority to be included in UNHCR and NGO/Government programming in community centers, outreach initiatives and education.

In addition, the evaluation finds that, in part due to the lack of access to education, **child labour (most common protection problem for boys) and early marriage (most common protection problem for girls) reflect the socially acceptable ways for Syrian refugee households to deal with the challenges and societal pressures that they face in exile**.

**Finding 46. There is a serious gap in the data regarding early marriage and child labour among Syrian refugees in Turkey**

Poverty and lack of formal labour access, lack of viable educational pathways and social acceptance of early marriage/child labour are a toxic mix of factors that have ended up placing many Syrian children and adolescents[100] into exploitative situations of child labour or early marriage.[101] The evaluation team

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[99] Selcuk R, Sirin and Lauren Rogers-Sirin. <u>The Educational and Mental Health Needs of Syrian Refugee Children</u>, Migration Policy Institute, 2015. p. 12-13

[100] Estimates of the incidence of child labour and early marriage vary across a number of Turkish and international studies, surveys and reports. I

[101]<u>Preventing Conflict, Transforming Justice, Securing the Peace: A Global Study on the: Implementation of United Nations Security Council resolution 1325</u>, p. 72, UN Women (2015); <u>Small Hands, Heavy Burdens: How The Syria</u>

searched diligently for reliable data on the incidence of child labour and early marriage among Syrian refugees in Turkey. Although there is data for Lebanon and Jordan[102] that is presumed to be comparable to the situation in Turkey, and there is data on the incidence of early marriage and child labour among Turkish children, the team was very surprised to find that five years into this huge emergency none of the major child protection NGOs or UN agencies including UNHCR has reliable statistics on child labour or early marriage among Syrian refugees in Turkey. However, the evaluation was able to identify a number of qualitative studies, including UNHCR's own internal AGDM and office-led focus groups and those of NGO partners, that confirm local perceptions on the part of UNHCR partners and Syrian refugees themselves that **early marriage and child labour represent the most significant and pressing child protection problems facing the Syrian refugee population in Turkey**.[103]

**Recommendation 11.** **UNHCR Turkey should work with UN Women, UNFPA, UNICEF and leading NGOs, and in close collaboration with Turkish Government authorities and academic institutions, to conduct a comprehensive study of the "State of Syrian children in Turkey," with a particular emphasis on collecting information on child labour and early marriage**

**Finding 47.     Syrian refugee children in Turkey appear to be at greater risk of early marriage and child labour than when they were in Syria**

Regarding child labour, it is generally believed that families have been pushed toward child labour as a coping strategy after their savings are exhausted. This is felt to be exacerbated by the conservative religious values of many refugee households inhibiting adult women from working outside the home in situations where they might come into contact with men who are not family members. In this context, and particularly for the estimated 22 percent of households that are female-headed,[104]even boys as young as nine or ten years old are not seen as 'children' but rather the protectors of their mothers. While UN and western humanitarian organisations are upholding a world view in which children have rights that adults need to protect, in the Turkey context such values and beliefs are not necessarily shared - and indeed it might be seen that it is the duty of male children to protect the rights (and "honour") of adult women. Tackling issues such as these is not easy, particularly when the host society to some extent tolerates them, but that does not make it less imperative.

Early marriage is a particularly serious problem: firstly, because it is clearly an egregious form of SGBV, but also because in many cases these marriages are temporary and/or polygamous and/or unregistered, placing girls at immense health and protection risks, and children borne of these relationships are very likely to be stateless – creating multiple dimensions of exploitation and risk that can be passed along to the next generation. Not only do child labour and early marriage constitute a wholesale removal of children's rights, but they are a clear reversal in relation to the relatively higher rates of education and

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Conflict Is Driving More Children Into The Workforce; Save the Children (2015); Syrian Refugees in Turkey: Gender Analysis: Centre for Transnational Development and Collaboration (2015)

[102] For example, Too Young to Wed: The growing problem of child marriage among Syrian girls in Jordan: Save the Children: 2014; To protect her honour: child marriage in emergencies – the fatal confusion between protecting girls and sexual violence: CARE: 2015; A study on early marriage in Jordan: UNICEF: 2014; "Because we struggle to survive" – Child Labour among refugees of the Syrian conflict: Terre des Hommes: 2016

[103] Among these are UNHCR's 2015 AGDM Participatory Assessment, UNHCR's 2014 Refugee Focus groups on Early Marriage in Gaziantep and the South-East Region

[104] AFAD (2013) op. cit.

lower rates of early marriage and child labour that the same refugees experienced while they were in Syria before the crisis. If this backsliding is to be halted, and if these Syrian children are not to lose an entire generation,[105] then UNHCR needs to work with partner agencies notably UNICEF and UNFPA, and Government authorities, to design and implement a comprehensive multi-year action plan to tackle these critical problems.

Finally, as UN agencies are the standard bearers for gender equality and women's rights, some partners found it perplexing that no UN agency in Turkey had any public response to the May 27, 2015 decision by Turkey's Constitutional Court striking down Sec. 230 paragraphs 5 and 6 of the Turkish Criminal Code that prohibit arranging or conducting a religious marriage ceremony without obtaining a civil marriage as well, and that effectively grants religious legitimacy to early marriage without rights. According to one UNHCR operational partner: "*In Turkish law, civil marriage registration is the only thing that protects the rights of the woman to divorce, alimony, and child support.  For Syrian refugee women and girls, who are tending to see early marriages and second marriages to older Turkish men as a form of social and economic protection, this may have the adverse effect of increasing the number of child brides, and increase polygamous relationships in which young women and their children have no legal rights or recourse.*"[106]

> ### *Solutions to the problems they face, as proposed by refugees in AGDM focus groups*
>
> "Especially for single women, providing income earning activities from home was proposed. Also promoting safe part-time job opportunities for adolescents so that they can continue their education at the same time was another proposed solution from the youth groups.
>
> For families with children of school age, the need for education incentives and more social assistance is underlined to promote access to education by children in general. Promoting the importance of education among parents was another suggested solution to increase enrollment rate and decrease child labour that is stemming from lack of education opportunities..."
>
> AGDM Participatory Assessment Report, March 2015

**Recommendation 12.**  **UNHCR Turkey should step up its efforts regarding child protection and SGBV in particular combating two forms of child exploitation that are considered to be widespread among Syrians in Turkey: child labour and early marriage.  A clear child protection action plan needs to be developed with the Government, UNICEF and other partners, and its implementation needs enhanced coordination and substantial investment from Government line ministries, UNHCR, other agencies and INGOs, as well as from the refugees themselves**

Thanks to UNHCR's AGDM Participatory Assessments, refugees themselves have been able to suggest a range of solutions, and a number of good-practices and pilot projects are already underway: in both Istanbul and the Southeast, UNHCR has been working the MoFSP and ASAM/social workers to develop conditional cash assistance measures providing cash transfers for refugee children at risk of child labour, exploitation and early marriage, on the condition that their families continue to send them to school.  For the time being, such initiatives remain on a limited scale.  In Istanbul, another pilot project is a mother-daughter group where Syrian refugee mothers and daughters can share their issues and concerns, and

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[105]The needs and strategy are well described in UNICEF's "No Lost Generation" initiative http://nolostgeneration.org/about, the problem is that Turkey seems to be lagging behind other refugee-hosting countries in the region

[106] Interview with Operational Partner of UNHCR, February 2016

address the issue of early marriage in the presence of facilitators who can help identify the risks of this practice and alternatives for the families. However, addressing gendered child exploitation needs to move beyond scattered initiatives, and UNHCR and its partners need to work at the same time on awareness-building, legal issues, improving education access (including through conditional cash assistance) and economic opportunities.

The evaluation team firmly believes that **only a well-designed action plan to address all of these pull/push and social factors will have a chance of breaking the vicious cycle in which Syrian families with adolescents currently find themselves. It is for UNHCR and partners to develop this action plan and turn it into a coherent programme, but suggested elements of such an action plan are captured in the figure below:**

*Figure 4.4*      *Elements of a Child Protection Action Plan*



**Awareness-raising**

Awareness among children of their rights and of the costs/risks of early marriage and child labour

Community awareness of the long term individual, family and community impact of widespread child labour and early marriage

Awareness of how to access education and other available service

Awareness of Turkish laws

**Legal/regulatory avenue**

Training of Turkish authorities on the Turkish laws pertaining to Syrians

Enforcing child labour legislation

Enforcing child marriage legislation

Counselling for children who are married or working

**Child Protection Action Plan**

**Education**

Strengthening school infrastructure

School transport

Turkish language training for students

Arabic language training in Turkish schools

Provision of supplies to schools

Provision of supplies to school children

Programme to hire Syrians as educators

Scale up higher education scholarships

**Economic opportunities**

Adult skills training and employment so families have adult breadwinners

Economic incentives (conditional cash transfers) to families to keep male and female children in school

> **Finding 48.**      **Female-headed households are at particularly high risk of both child labour and early marriage, and should be included in vulnerability criteria for income support**

Many of the elements of this outline action plan are discussed elsewhere in this evaluation report. What perhaps deserves a little more explanation here is the dimension of economic opportunities. There is no doubt that Syrian parents and children are making an economic calculation when children marry early or go to work: and to address this the economic push factors needs to be addressed. One aspect of this is to ensure that households have enough adult breadwinners to remove the economic incentive to child exploitation – but this might not be possible or sufficient in all cases. Hence the need to complement

employment-related initiatives with others that either compensate families for keeping their children in school (conditional cash transfers of the type used in Turkey's domestic programmes to combat child labour), or that simply provide income support to families through unconditional transfers that target families with no income and with children at an age where they are at risk of child labour or early marriage. This logic suggests that families with this structure, and **in particular low income female-headed households with adolescent children, should be added to the vulnerability criteria for future generations of cash and e-voucher programmes**

## SGBV and gender dimensions of the response

### *Gender analysis and advice*

With regard to gender-appropriateness of programme and protection responses, it is important to note that globally, UNHCR has reduced the use of gender specialists and eliminated gender focal-points in favour of mainstreaming gender analysis throughout its operations. In theory, in line with UNHCR's age, gender and diversity mainstreaming approach, all UNHCR staff are now responsible and in some way accountable for addressing differential access to protection, assistance and the enjoyment of rights on the basis of age, gender and diversity. In practice, the evaluation team found that UNHCR staff and partners, particularly those in the field, feel the need for more guidance and support to appropriately address issues around gender equality, protection and participation.

| **Finding 49.** | **UNHCR staff and partners informed that team that they need more guidance on gender equality in the particularly complex social and economic context of Turkey** |
|---|---|

Although UNHCR Turkey has shown some degree of organisational commitment to the AGDM approach (see above), UNHCR does not appear to have a **considered and articulated gender analysis and a gender-equality approach** to guide its strategic and programmatic efforts. Instead, too much is being left to individual staff judgement, with conflicting analyses, interpretations and limited guidance provided from higher levels (MENA and HQ). In the words of one UNHCR staff member: *"On a range of issues related to gender and sexual and gender-based violence, including domestic violence and early/forced marriage, staff are very divided and torn as to the best approach on specific cases. Some believe that is best to take the 'culturally sensitive approach' understanding that some of these practices, such as early marriage were brought with them from Syria. Others believe we should take a more 'legalistic approach', to seek to enforce the law because Turkish law has clear provisions on dealing with child marriage and other SGBV issues.[107] Even when we approach those in MENA or HQ for guidance on how to deal with specific cases we can get different answers to the same situation."*

In a second example of the need for guidance, in a focus group discussion with a mixed group of field, protection and community-based protection staff, there was lively debate as to the extent to which the strategy of never mixing men's and women's refugee representative groups was really working, or if it would not be appropriate to bring men's and women's groups together to find joint solutions to some

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[107] Marriage in Syria is legal at aged 16 – so there is a discrepancy between Syrian and Turkish laws Syrian refugees might not be aware of

issues. According to one staff member: "*Men are listening to the opinions of male religious leaders, and women are listening to female religious leaders. Sometimes they are listening to different messages and so they are coming at questions of SGBV and child protection from different angles. Maybe it is time that we bring them together to exchange views and understand where each other is coming from*." On this issue, other team members disagreed.

Another staff member expressed her uncertainty about how to deal with specific protection issues in the following manner: "One of the main protection issues that we face is that of child or early marriage. In general, if we can avoid the legal approach, we try to 'do no harm' - so if the girl is 16 and the boy is 18, and provided the girl has consented and is encouraged to remain in school, then the cost of pursuing a legal solution seems to outweigh the benefits...But what about when the girl is 15 and the boy is 25? Or the girl is 14 and the man is 40? Sometimes it is hard to see how to pursue the best solution...''[108] While early marriage is frequently flagged as a leading protection risk and is seen as a form of SGBV by UNHCR staff, this practice is only the visible tip of a much bigger complex of beliefs, behaviours and inequalities of opportunity, resource ownership, mobility and decision-making that Syrian refugee women and girls in Turkey are experiencing.

While the AGDM framework is useful, its implementation in Turkey would benefit from some technical support from HQ and other experienced parties. Both the 2014 and 2015 COPs refer to supporting IPs and NGOs to utilize an AGDM approach in their planning, and training sessions were given to the staff of the Harmonization Department of DGMM especially focusing on participatory assessment. But despite all these efforts our review highlights **that there is no shared and articulated age and gender analysis, or reflection on best practices regarding the gender challenges of protection, programme and policy dialogue for Syrian refugees in Turkey**.

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| **Finding 50.** | **Many individual UNHCR and partner staff are gender aware, but in the absence of a strong and shared gender analysis linked to a gender strategy, activities to reduce age gender and diversity gaps are fragmented and many opportunities for coordination and leverage are lost** |

Through interviews of UNHCR and their partners we found that there is a high level of individual gender awareness of staff both at central and field levels. But individual awareness and analysis does not easily translate into an operational approach unless such is facilitated and made systematic. For example, the evaluation team met with the Provincial Directorate for Women's Affairs in Gaziantep. This government unit had opened all its services to Syrian refugee women, including women's shelters, and was itself seeking partnerships to analyse the issue of early/child marriage among the local refugee population. With the support of UNICEF and the University of Gaziantep, the Provincial Directorate was initiating a study on early marriage as the basis for developing a response.

Although UNHCR's partners (ASAM and HRDF) collect sex disaggregated data in their Community centres, the statistical analysis of gender issues is limited to an over-simplified analysis of differences by sex. While sex-disaggregation is a first step of gender analysis, it is not sufficient. There remains a critical need to assess, analyse and reveal social roles, social treatment and differentials such as access to services, division of household tasks, domestic violence, different access to and control over resources, as well as gender disparities in employment, education, literacy and age of marriage.

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[108] Evaluation team interview with UNHCR staff

Many informants[109] suggested that a careful analysis of the barriers that Syrian young girls and women face should be conducted. According to one respondent to the evaluation survey: "*As the number [of refugees] is increasing unexpectedly, protection needs and challenges are increasing as well. The targeted community needs to be assessed and evaluated carefully to identify the gaps and the needs, in order to have a better response and prevention in a timely manner before getting difficult to cope with. Women may not be able or [may be] reluctant to express what kind of protection problems they have. This also concerns the vulnerable, and the disabled as they are invisible in the community.*"

**Recommendation 13. UNHCR Turkey should work with MoFSP, UN Women, UNFPA and academic institutions to conduct a country-wide age, gender and diversity analysis to underpin the 3RP and provide the foundations for a Gender Strategy integrated within the Protection and Solutions Strategy, that in turn can frame more effective action plans for Community-based Protection, Child Protection and SGBV**

## *Sexual and Gender-based Violence*

In Turkey's urban areas,[110] UNHCR and its partners are working within the dense institutional network of Turkish government health, education and social services that are designed to address domestic violence, early marriage and other common forms of SGBV within Turkish society. Turkey's comprehensive legal framework on prevention and response to SGBV also covers refugees and asylum-seekers, and refugees who are survivors of SGBV are able to benefit from response mechanisms within the framework of the law including access to legal aid services, health services, safe shelters and psycho-social support. If refugees are not accessing these services it is because they do not know they have access, the Turkish institutions do not know that refugees have access, the Turkish institutions do not have enough capacity, or refugees have language and other social barriers to access.

UNHCR's support for SGBV during the evaluation period was mainly provided through case management by implementing partners in urban community centres. The community centres provide a range of services including information dissemination, referrals, and legal and psychosocial counselling. In addition, UNHCR also increased its cooperation with Bar Associations, and as part of its capacity building activities UNHCR included SGBV and the national legal framework on SGBV in other training activities with national counterparts including DGMM and AFAD. Partners reported that simple things, like UNHCR's investment in the training and provision of women Arabic-Turkish interpreters to police stations and hospitals to accompany victims of domestic violence or abuse, and the training of social workers and receptionists at the community centres, were some of the most valuable ways to assist victims of SGBV.

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[109] Interviews with UN partners, Implementing and Operational partners and UNHCR staff

[110] AFAD and TRC together with other government departments directly provide counselling services in camps

**Finding 51.**   **UNHCR Turkey has been effective in addressing a small number of reported SGBV cases, but has not placed sufficient priority on addressing the systemic causes of SGBV and strengthening the capacity of Turkish SGBV response and advocacy bodies**

The limitations of the case-management approach to SGBV are three-fold. First of all, it is a relatively small number of refugees who have access to community centres at all. Secondly, there were reported inconsistencies in how cases were handled,[111] as well as reports of weak internal coordination within UNHCR.[112]And third, the case-management approach does not tackle prevention and the systemic issues underlying the prevalence of SGBV as reported to INGOs and to UNHCR in their various participatory assessments. UNHCR's Participatory Assessments have revealed consistently that there is a widespread tendency for refugees themselves not to report domestic violence - nor for government officials to respond to them, and that the exploitative practices of child labour and early marriage are widespread partly because they are generally tolerated by refugee families and by Turkish institutions. In this circumstance, more needs to be done by the Government of Turkey and UNHCR, in association with all stakeholders, to tackle the root causes of SGBV and child exploitation among refugees in Turkey.

There are four reasons why it seems to the evaluation team that SGBV and Child Protection have been addressed only partially and late in the situation: (a) these aspects of protection are a shared responsibility between UNHCR, UNICEF and UNFPA, who have been quite slow in coordinating their own efforts,[113] (b) UNHCR does not have a strong and established relationship with the main counterpart Government Ministry MOFSP (which itself does not see refugees as their priority), (c) UNHCR in Turkey was hard-wired for a case-management approach to refugee protection – as a result of which a few individual cases of SGBV and child abuse received specific attention,[114] but the systemic issues were insufficiently addressed, and (d) issues of SGBV, domestic violence, trafficking, child labour and early marriage are genuinely difficult issues to address in the social and political context of Turkey.

## *Conclusion*

In order to bring some coherence and focus to protection, it is recommended that UNHCR conduct three foundational studies/needs assessments, and develop strategies and action plans, as recommended earlier in this report. Many of the key elements are already in place, but there are some important missing pieces and the various elements need to be brought into a coherent whole in order to avoid duplication and confusion, as well as to allocate scarce resources efficiently.

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[111] For example, there was confusion regarding how to handle cases of early marriage where the girl was over 16 – the legal age of marriage in Syria but not in Turkey

[112] For example, there was an IP agreement approved by UNHCR Ankara to support a network of women's centres in Sanliurfa, without consulting or informing the protection or community services teams in either Ankara or Gaziantep

[113] There are few references to SGBV and Child Protection coordination in records of coordination meetings, a national level working group on SGBV was only created in early 2015, an SGBV working group was started late in Gaziantep, and as far as we can determine there is no mechanism for Child Protection coordination

[114] UNHCR's Turkey SOP for SGBV is detailed and case-specific, and as far as the evaluation team could ascertain in the few instances where SGBV cases have been identified by community centres or camp visits they have been appropriately referred for counselling and downstream services – but these instances are only handfuls

To this end, the evaluation team recommends that UNHCR consider the following system of analyses, strategies and plans, that together we feel would enable UNHCR Turkey to address the serious protection concerns of refugees in Turkey more effectively.  In the following schematic, those components that are already in place (albeit in need of updating and harmonising with the others) are signalled with a red check mark (✔).   In the opinion of the evaluation team it is important that the Urban Strategy and Gender Strategy both be integrated (as chapters for example) of the Protection and Solutions Strategy.  Also, the proposed Action Plans could each be subject to a costed annual workplan (through the COP).  The need for a Strategic Communications Action Plan is discussed later in this report.

**Recommendation 14.    UNHCR Turkey should adopt a more structured approach to needs assessments, analyses, strategies and action plans, thereby facilitating priority-setting and the addressing of key analytical gaps concerning child protection and SGBV**

*Figure 4.5      Elements of a Comprehensive Protection and Solutions Strategy*
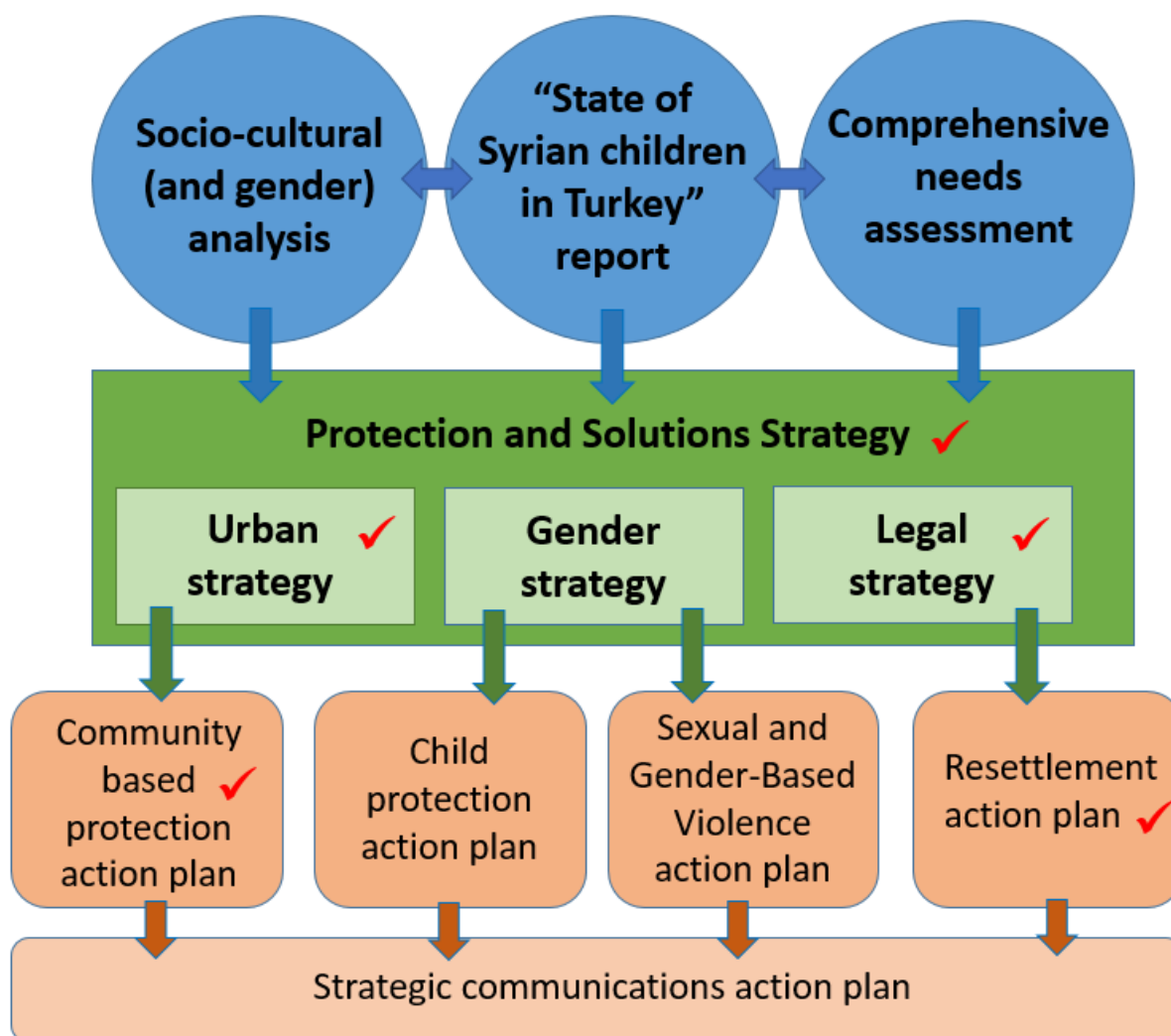
# 5 Education

Education is a basic human right and provides an important entry point in emergencies for reaching the most vulnerable children, youth and adults.  Schools, especially primary and secondary schools, can provide a protective environment for children and youth, allowing them to feel that they are safe, able to live normal lives, and to resume personal growth. Schools also give structure to everyday life and hope for the future. In addition to basic education, non-formal, vocational as well as tertiary education are important avenues for refugees to acquire skills and knowledge for living healthy, productive and self-reliant lives.  Education is an essential component of protection and livelihoods strategies.

## Education approach in Turkey

UNHCR's (Global) Education Strategy[115] takes a two-pronged approach: first is an ***emergency response*** that provides immediate education opportunities and safe learning spaces for refugee children in camps as soon as possible.  The second approach is to promote ***medium to long-term*** education policies and strategies that will build on the education system of the host country, and strengthen government's capacity to meet the educational needs of refugee children. In the case of Syrian crisis that is now in its fifth year, UNHCR has been encouraging partners and government to do long-term planning, while also remaining prepared for an emergency response in case of possible new influxes.[116]

As a matter of policy, UNHCR prefers "integration of refugee learners within national systems where possible and appropriate,"[117] and has been pursuing this policy in Turkey.[118]  Because Turkey does not use Arabic as a medium of instruction, this has led UNHCR to place a major emphasis on supporting Syrian children to access Turkish schools by supporting the legal and policy changes to facilitate access, and by providing Turkish language training to students, material assistance for Turkish schools, as well as guidance and support to Turkish teachers who are in some cases struggling to provide services to Syrian students.

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[115]UNHCR's Education Strategy 2012-2016   http://www.unhcr.org/protection/operations/5149ba349/unhcr-education-strategy-2012-2016.html

[116]UNHCR's public reporting http://reporting.unhcr.org/node/2976

[117] UNHCR's Education Strategy op. cit. p 8

[118] The evaluation team's attention was also drawn to a key UNHCR policy decision of EXCOM 1987, which emphasises preservation of cultural identity: "47 (o) Reaffirmed the fundamental right of refugee children to education and called upon all States, individually and collectively, to intensify their efforts, in co-operation with the High Commissioner, to ensure that all refugee children benefit from primary education of a satisfactory quality, that respects their cultural identity and is oriented towards an understanding of the country of asylum", echoed for example in the EXCOM resolution of 2007 on Children at Risk.  Neither of these, nor other EXCOM resolutions examined, is explicit on the preferred language of educational instruction

**Finding 52.** **Thanks to the concerted efforts of UNHCR and UNICEF, and the generosity of the Turkish government and people, Syrian school-aged (6-17) children have the right to educational services delivered through Turkish state schools as well as through temporary education centres**

Specifically, UNHCR, together with UNICEF and other partners, has advocated for a series of policy changes by the Government, including most importantly the ***Circular 2014/21*** that regularized access to education by Syrian school-aged (6-17) children.  The circular ensures that foreigners under Temporary Protection have access to educational services delivered through Turkish state schools as well as through temporary education centres (TEC), an alternative system of schools set up with substantial support from UNICEF only for Syrian refugee children, and teaching in Arabic using a modified version of the Syrian curriculum (see more on this below).

UNHCR's education programs are built around three major principles: ***access, quality and protection***.[119][120] These principles uphold the minimum standards of the Inter-Agency Network for Education in Emergencies (INEE), and these were the principles used to design education programmes for Syrian refugees.[121][122]

The provision of educational services in Turkish public schools and temporary education centres is the result of a partnership between the Ministry of Education (MONE), UNICEF, UNHCR, and other donors. While MONE is primarily responsible for the coordination and supervision of these services, UNICEF and UNHCR provide technical and financial support. For example, MONE consulted with both agencies on the development of Circular 2014/21. UNICEF has provided technical assistance for the registration and monitoring of Syrian students in the MONE database (known as YOBIS), contributed resources for the construction of temporary education centres, and provided Syrian volunteer teachers in temporary education centres with financial incentives and training.  Since April 2015 this has been supplemented by UNHCR-provided teaching materials to MoNE-recognised TECs inside and outside camps.[123]

## 5.1.1  Early Childhood Education and Care

UNHCR, through its implementing partners, is supporting Child-Friendly Spaces (CFS).  These are not designed for Early Childhood Education and Care, but are primarily intended as safe havens for children in emergencies, and safe places for parents to leave their children when necessary.  Most CFS offer Turkish language courses, catch-up classes, art and play activities, and organise social events such as national day celebrations for refugee and host community children. CFS were supported by UNICEF and UNHCR in

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[119]Refugee Education: A global Review, 2011 Geneva- UNHCR (Dryden-Peterson,2011)

[120]UNHCR Education Strategy 2012-2016

[121]Education of Syrian Refugee Children Managing the Crisis in Turkey, Lebanon and Jordan(Culbertson & Constant, 2015)

[122]An independent evaluation of UNICEF's response to the Syrian Refugee crisis in Turkey 2012-2015, Final Report Nov.2015 – UNICEF, Darcy James and et.al

[123]Human Rights Watch (2015). "Preventing a Lost Generation: Turkey – Barriers to Education for Syrian Refugee Children in Turkey", USA: p 17:

Istanbul, Gaziantep and Sanliurfa.[124] The quality and appropriateness of CFS need to be monitored.[125] It is strategically important for UNHCR, however, to explore additional ways of supporting mothers and families with very young children, helping them to better care for their children's health and education. Collaboration with UNICEF and other organisations on the ground to integrate early childhood education and care into non-formal education interventions is a "sure start" in this regard.

## *Turkish Language Training*

**Finding 53.**    **Turkish language training for employment, and academic Turkish language training for university students, are particularly efficient and effective**

Learning Turkish is crucial for Syrians to attend public schools, to move on to higher education, to get employment, and generally to lead productive lives in Turkey. UNHCR, in collaboration with MoNE and partners, has supported various Turkish language training programs in informal, community or NGO-run facilities.  For example, in 2015 UNHCR provided Turkish language courses to approximately 100 men, 900 women and 400 children in Language Training Centres in Sanliurfa.[126]  In addition, 6,750 Syrians participated in social, language and life-skills activities. In 2015, UNHCR established two dedicated Turkish language teaching centres in SE Turkey to enable Syrian children to integrate in Turkish schools.[127] UNHCR also works closely with TÖMER (a Turkish language and cultural training institution) to enable promising students



Learning beadwork in an Istanbul community centre (UNHCR photo)

to learn enough Turkish to gain access to university.  In partnership with the Presidency for Turks Abroad and Related Communities (YTB), a Turkish government organisation responsible for international students, UNHCR has offered 1,600 advanced Turkish language scholarships to high school graduates. Students who are interested in studying in Turkey and have demonstrated academic potential are admitted to the 10-month programme with little or no prior knowledge of Turkish.

## *Vocational Training*

**Finding 54.**    **Vocational training is limited and not well connected to the job market**

UNHCR, through its implementing partners, supports the government in providing limited **vocational and skills training** to Syrian youth and adults to enhance their employment opportunities and self-reliance.[128]

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[124]Asylum Information Database (May 2015) ``Country Report: Turkey'' p.74

[125]As observed during interviews, the physical conditions of CFS as well as appropriateness of activities need improvement in most cases

[126]Asylum Information Database (May 2015) ``Country Report: Turkey'' p.74

[127]Interviews with MoNE and UNICEF.

[128]Interviews with UNHCR Education Officer, Government officials (Ankara, Gaziantep, Maraş)

Through its implementing partners and in particular through community centres, UNHCR provides a limited range of life skills training to Syrian youth and adults, to enhance their employment opportunities and self-reliance.  With the possible exception of the sewing training in camps that is coordinated by the Government not by UNHCR, for the most part this training does not lead to technical skills certification and is not directly connected to a job market.  Beyond the life skills training provided in community centres, UNHCR advocates for effective use of existing vocational education opportunities offered by MONE and the Turkish Employment Agency (IŞKUR).   However, in order to access these programmes, refugees need to have the information in the first place, and at least intermediate level Turkish.



Syrian children learning Turkish (UNHCR photo)

Furthermore, MoNE training programmes, unlike IŞKUR's technical and vocational training programmes, are not geared towards employment and the labour market.  Noting the added vulnerabilities of female-headed households and the risks of early marriage, all vocational training actors should ensure equal access for girls and boys.

## *Higher Education*

**Finding 55.    UNHCR has provided unprecedented support for tertiary education, although not nearly enough to meet the enormous needs**

In recognition of the important role that higher education plays in strengthening human capacity and building community resilience, the Government of Turkey has waived tertiary education tuition fees for Syrian students and provided 1,000 full scholarships to Syrian refugees. For its part, UNHCR Turkey has introduced the Albert Einstein German Academic Refugee Initiative Fund (DAFI) scholarship programme, offering over 80 scholarships for Syrian students since 2014. The DAFI programme is implemented in partnership with YTB. For 2016 the number of DAFI scholarships rose dramatically to 1**,**000 over the period 2016-2019,[129] the highest of all DAFI programme countries, and this is matched by YTB with another 1**,**000 scholarships.  Though relatively small in relation to the needs, such measures are clearly improving lives for those individuals and their families that have been able to access these services. UNHCR is also in discussion with YTB to transform the existing language scholarship programme into a more structured university preparation programme that will combine language training, academic support and counselling on university admissions procedures. As YTB reported, the Government is aiming at providing higher education to 40,000 Syrian students. This calculation is based on the Syrian rate of university enrolment before the war, which was about 25%.   The estimated number of tertiary school age Syrians is around 160, 000, and 25% of this number makes 40,000. Similarly, for vocational training, particular attention needs to be paid to ensure that women have equal access in this environment of strong gender stereotypes.

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[129] In 2015 there were 5,803 Syrian applicants for 80 DAFI scholarships, the highest number of DAFI applications ever received

## Education coordination

**Finding 56.    Coordination for education at national and local levels is not well organised, with incomplete participation and insufficient attention to joint planning**

Coordination of education has not always been easy, and takes place at different levels. MoNE chairs a Working Group on Education and UNHCR is an active member although the group has not met since November 2015.  This working group is intended to serve as the major platform among government and UN Agencies for identifying and advocating on matters related to the education of Syrian Refugees, but unfortunately it does not have NGO members.  At the Provincial level MoNE, through its Provincial Education Commissions (re: Circular 2014/21), organises Provincial Action Plan meetings supported by UNICEF. UNHCR is *"invited"* to these meetings,[130] but given UNHCR's intention to retain a focus on education in 2016 and beyond, it would be important for UNHCR to become a permanent member of these commissions.  And in Gaziantep, UNHCR and UNICEF co-chair a Working Group on Education with open membership but participation primarily by international NGOs in the region. The major purpose of this working group is to create a platform for information sharing and joint planning. However, partners have criticized the working group on two major grounds: first it is not felt to be inclusive enough, and does not seem to welcome local NGOs; and second, it remains limited to information sharing, and does not lead to joint needs assessment, planning and action.[131][132]

The major coordination issue has however been around the respective roles and approaches of UNHCR and UNICEF (see Coordination Chapter above), which are to some extent also rooted in different expectations of how long Syrians would stay in Turkey. From the outset, these two organisations have followed fundamentally different education strategies in Turkey.  In line with the Convention on the Rights of the Child[133] and the Core Corporate Commitments in Humanitarian Action,[134] UNICEF has consistently advocated for and substantially supported education in Arabic (mother tongue) using a modified Syrian curriculum: an approach that would be well-suited to a short asylum period.  As we have seen, UNHCR's policy is to integrate refugee children into the host country's public schools, and in the host country language, implying an expectation on the part of UNHCR of a longer stay in Turkey.

UNHCR's rationale for mainstreaming refugees into national education systems is based on five arguments: (a) it encourages government to assume responsibility for refugee protection and rights as outlined by relevant conventions; (b) it provides certification to refugees through accredited examinations; (c) there is greater quality assurance of teaching and learning through a national system; (d) it provides opportunities to promote social cohesion between refugees and national children; and (e) it is more sustainable: investment in existing systems strengthens partnership with all education actors

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[130]Handover note of Education Associate in Gaziantep (Oct.2014-Feb. 2015)

[131]Interviews with partners

[132] For further comments on disconnects between Government and UNHCR coordination mechanisms see Chapter 4 above

[133] As per CRC-Article 30 (Children of minorities/indigenous groups): Minority or indigenous children have the right to learn about and practice their own culture, language and religion. The right to practice one's own culture, language and religion applies to everyone; the Convention here highlights this right in instances where the practices are not shared by the majority of people in the country. http://www.unicef.org/crc/files/Rights_overview.pdf

[134]http://www.unicef.org/publications/files/CCC_042010.pdf

for increased access and quality.[135]Similarly, UNHCR also encourages the use of the curriculum of the host country,[136] as it is generally the most sustainable and protective option in the medium to long term.[137] Given that the average length of refugees staying in a host country is around 17 years, and Syrian refugees have already been in Turkey for 5 years, UNHCR's approach seems pragmatic and sustainable.

| | |
|---|---|
| **Finding 57.** | **The longer Syrian refugees stay in Turkey, and the more the Turkish government system gears up to provide education to Syrians according to their own directives and guidelines, the stronger becomes the argument for UNHCR's preferred approach of Turkish medium instruction in national schools** |

UNICEF and UNHCR have recently agreed on an explicit division of labour regarding education for Syrian refugee children in Turkey. In this division of labour, UNICEF is responsible for pre-primary, primary and secondary education, while UNHCR is responsible for Turkish language training, non-formal and vocational, technical education, and tertiary education. Both organisations will be involved in policy development and strategic planning in collaboration with the government and other partners (e.g. ILO, IOM, and NGOs).  Although this division of labour was more *ad hoc* and not agreed in consultation with MoNE officials, MONE seems to accept this approach. Also, given the likelihood of Syrian refugees staying for the long term in Turkey, and the prospect of limited additional donor funding, UNICEF is currently considering opening up more options[138]that include mainstreaming into state schools.

# Education performance

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|---|---|
| **Finding 58.** | **The rate of primary and secondary school enrolment among Syrian refugees in Turkey is approximately 35%**[139] |

While recalling for the readers that there is a fundamental problem of data on Syrians in Turkey, the best estimates available[140]on educational enrolment are presented in the following table:

| Description | Number | Notes |
|---|---|---|
| Estimated number of school aged Syrian refugee children[141] | 782,829 | 34.2% of refugee population of 2,291,900 persons |
| Number of children enrolled in Turkish schools (Grades 1-12) | 55,360 | Data supplied by MoNE[142] |

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[135]EDUCATION: Issue Brief 4, July, 2015 Geneva-UNHCR

[136] With the important addition of instruction in the refugees' own language and culture, with a view to conserving cultural identity and facilitating eventual return to the country of origin

[137]EDUCATION: Issue Brief 3, July, 2015 Geneva, UNHCR

[138] Interview notes

[139] Consistent also with a Turkish Government estimate of 30%

[140] UNHCR's Briefing note: Education access for refugee children in Turkey Feb-2016 (internal)

[141] Numbers of school-aged children are estimated based on numbers of persons registered with Turkish authorities. As of November 2015, there were an estimated 756,000 school-aged Syrian children in Turkey

[142] This represents significant progress compared to the 4,242 refugee children attending school as reported by UNHCR at the end of 2014

| Description | Number | Notes |
|---|---|---|
| Number of children enrolled in temporary education centres in camps | 78,707 | Over 90% of the school-age population of camps. Data supplied by MoNE |
| Number of children enrolled in temporary education centres in communities | 144,823 | Data supplied by MoNE |
| Total number of children in formal education | 278,890 | Includes both Turkish schools and TECs |
| Percentage enrollment (Grades 1-12) (camp and communities) | 35.58% | Consistent with UNHCR reporting from end 2015 (44% primary school enrollment) |

**Finding 59.     TECs are vital in the short term, representing 80% of primary and secondary enrollment in 2015**

**Finding 60.     Education enrolment is by far highest in camps**

**Finding 61.     Education enrolment drops off sharply after grade 4**
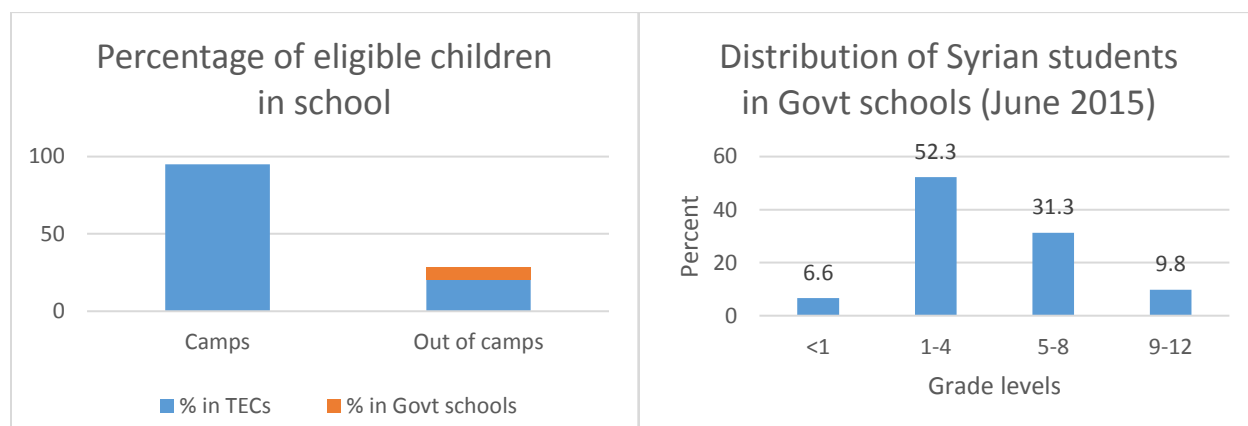


**Finding 62.     Unless education services improve access and quality, significant increases in school attendance are unlikely**

In general, the lack of sufficient and adequate learning spaces and teachers represent the major barriers to scaling up access to education across the Syrian emergency.[143]  But beyond enrolment limitations, the truth is that we do not know anything about the educational achievement of refugee students in Turkey, because neither attendance nor attainment are systematically tracked by MoNE.[144][145]

Furthermore, education of girls remains a particular challenge. There are several reasons for low school attendance and early drop out among Syrian children, and particularly among girls. They include families'

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[143]No author (2015) "3RP Regional Progress Report- June 2015", p19-20:

[144] Foundation for Political, Economic and Social Research (SETA) (2015) "Turkey's Syrian Refugees – Toward Integration" p 24:

[145] "When I Picture My Future, I See Nothing": Barriers to Education for Syrian Refugee Children in Turkey: Human Rights Watch: 2015

lack of knowledge of available options, low prioritization of education over other spending, and dependency on children's income.  In the case of girls, as discussed in greater detail earlier in this report, early marriage, in some cases to older, wealthier men, is seen as a coping strategy for vulnerable refugee families, and as a way to bring economic stability and improved social status to the family.

Although education is free in state schools, there is an associated cost that is often born by the parents, and TECs (especially in Istanbul and other cities) charge tuition fees. This can tip the scales of economically disadvantaged Syrian families.  Language proficiency is another important barrier to enrollment in Turkish schools, particularly for older children.

Additionally, a recent study by the World Bank lists the following reasons for poor access to education: (a) the high degree of mobility of the Syrian population, which exacerbates school dropout; (b) high levels of psychosocial trauma, which disrupts concentration; (c) difficulties in retaining Syrian teachers—most are unable to register for work permits and are paid modest stipends; (d) the lack of quality control of services provided through Community Based Education services; and (e) overcrowding, damage, and disruption to Turkish schools where double shifts are in place.

In the context of Turkey, with aspirations to access new European funding, the Government is currently preparing a comprehensive plan to fulfil unmet needs. The education component of this plan has been prepared by a Task Force set up by MoNE. UNHCR is part of this Task Force, and can use this as an opportunity to promote ***quality, accessible and protective learning*** opportunities for all Syrian refugees.[146]

**Recommendation 15.**  **(a) UNHCR Turkey should work with UNICEF and MoNE to prepare a comprehensive action plan for refugee education that would (a) be based on a situation assessment and analysis of the learning needs and expectations of Syrian children (which could be included within a report on the "State of Syrian children in Turkey" as recommended elsewhere); and (b) include a tripartite agreement on educational approaches, including use of curriculum and languages of instruction, with the Government of Turkey**

**Recommendation 15.**  **(b) In conjunction with Recommendations (12) and 15 (a) UNHCR should work with UNICEF, MoNE and MoFSP to scale up existing efforts to keep both girl and boy refugee children in school.  This could involve a combination of providing quality education opportunities, with community advocacy to prevent early marriage and child labour, and conditional cash assistance to compensate at-risk families for keeping their children in school.[147]**

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[146]In the medium to long term, UNHCR needs to consider that all refugees in Turkey should be able to benefit from such services

[147]This combination has been used successfully in Turkey's domestic programmes to combat child labour, and piloted by ASAM and other partners with MoFSP and education authorities

## Conclusion

**Finding 63.** **UNHCR's staff capacity and education programming allocation are not sufficient to meet the priority needs in this sector that is so pivotal for protection, social cohesion and sustainable livelihoods**

On education, there were unfortunate inefficiencies resulting from tensions between UNHCR and UNICEF in the early part of the Syria response, which "diminished the joint advocacy and influencing potential of the two organisations [and] produced among other actors the impression of the UN investing time and effort on contesting each other, rather than working together."[148] However, these tensions seem to have been largely resolved in 2015 through an agreed division of labour.  Looking ahead, the evaluation team concluded that the **education sector is one that needs significant further investment by UNHCR.**[149] Education is more than a right in itself; in the Turkey context, it is clear that **education is the key to reducing the incidence of early marriage and child labour, to social cohesion, and also to sustainable livelihoods**.  In order to be efficient in this context, UNHCR first needs **to staff up its education capacity in-country, both in Ankara and in the field offices**.  Secondly UNHCR should focus upon its agreed operating space within the agreed division of labour: notably **higher education, non-formal education, and Turkish language training** - aspects of education that are not being covered by other UN agencies. This is an area where UNHCR should identify specific institutional and policy bottlenecks, pin down a few areas where a strategic investment can leverage greater returns, and then deliver on those specific activities at scale.

**Recommendation 16.** **In support of this comprehensive education action plan, UNHCR Turkey should prioritise education according to the agreed division of labour by scaling up its staffing and its programming for non-formal education, Turkish language training and higher education.  In order to facilitate the inclusion of refugees in government schools, UNHCR should also increase the provision of school transport, conditional cash assistance linked to education in order to support children at particular protection risk, and supplies for refugee children in government schools**

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[148]Independent Evaluation of UNICEF's response to the Syrian refugee crisis in Turkey 2012-2015, November 2015 P.44

[149]  A new €10 million project with the Lifelong Learning Directorate of MONE, financed by the European Commission and starting in 2016 will provide a welcome boost to UNHCR's ability to implement its education programme in Turkey

# 6 Social Cohesion

It is incumbent upon UNHCR to be tracking, monitoring and addressing the risk of social tensions and potential for conflict between refugees and their host communities. During the course of the evaluation, the evaluation team spoke both with UNHCR and its partners - government, academics and NGOs - about social cohesion, and what measures UNHCR has taken to address risks of social conflict. This chapter of the report looks at several related aspects of this question, including managing public perceptions about Syrian refugees, engagement with municipal authorities, refugee representation, support for host communities, the bridging role of community centres, cultural appropriateness, and finally, the promotion of sustainable livelihoods for refugees.

Beyond media monitoring, the evaluation team could find little evidence that UNHCR had in place a system for tracking social tensions between refugees and host communities during the period under review, although there is an expectation that the 2016 move towards community-based protection and the 2015 Urban Strategy will begin to address this gap and progressively put in place a framework for identifying, monitoring and addressing social tensions, sector-by-sector and host-area by host-area. UNHCR staff as well as DGMM generally expressed a glossy view that social tensions were not a significant issue, and indeed most expressed surprise at the high level of social cohesion and harmony.  Interlocutors tended to ascribe the apparent high level of social cohesion to the fact that Turks in Southeast Turkey and Syrians from North Syria share a common cultural heritage and numerous extended family connections, and do not really see themselves as 'different' except for the differences in language.[150] This view is also reflected in the sections of the TPIR concerning "harmonisation" (the term used by the Government in preference to "integration") and in the mandate of the Harmonisation Division of DGMM,[151] which is focussed on explaining the applicable laws, how refugees can access services, and on orienting refugees to life in Turkey.

| Finding 64. | UNHCR's partners are less optimistic about the risks of social conflict than UNHCR staff, and feel UNHCR should be proactive |
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This perspective was not shared by UNHCR's implementing partners and some municipal governments, who point to Turkish opinion polling that shows opposition to further Syrian arrivals and Syrian residency,[152] and who consider that UNHCR should be doing more to identify the danger signs that indicate when and where social tensions could suddenly flare up. According to one municipal government partner: "the risks of social tensions are always there, and need to be carefully analysed. If you want to know what the triggers for such tensions are, you need to analyse the vulnerabilities of each refugee hosting area.  In Gaziantep, the problem of housing and high cost of rent has always been an issue, even before the refugee influx. So it is clear that issues around availability and cost of housing can provoke local conflicts and tensions between host and refugee communities. In Kilis, they have a hospital built to serve 100,000 … and now there are 200,000 including the Syrian refugees. So, in Kilis, access to healthcare can be a sudden point for conflict and social tensions. Somewhere else it could be transport that is the problem.  Each

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[150]  Although the evaluation team was not able to visit the Kurdish-speaking refugee hosting regions, the degree of social cohesion is thought to be even higher between the two cross-border Kurdish speaking populations

[151] http://www.goc.gov.tr/icerik/harmonization_917_1066

[152]  For example, Turkish Perceptions Survey; The German Marshall Fund of the United States: 2015

municipality in Turkey has its vulnerabilities that are likely to be where tensions arise, and the important thing is to address the risk factors before they come to the boiling point. It is important to hold monthly press conferences to dispel false notions that can be put out there in the media, that somehow refugees are a threat or a major problem. It is important to set the record straight..."[153]

There have been several well-publicized incidents of violence between Syrians and Turks. There are also anecdotal reports of Syrian children being harassed, discriminated against and bullied.[154]Friction points seem to be: increasing rents, decreasing wages, increasing job competition, longer wait times for hospital services, and the rise of polygamy and crime.[155] But how far these underlying concerns translate into active social tension is difficult to gauge, and it has been argued that even when tensions are real they are less likely to manifest as open conflict as long as the Government maintains a firmly pro-Syrian refugee stance.[156]

UNHCR has put in place a series of activities aimed directly at promoting social cohesion, for example Turkish language training and cultural orientation, activities to bring communities together for religious festivals and national day celebrations, and the recent creation of a number of "peace-building officer" positions in community centres, whose jobs include organising activities for refugees and Turkish citizens to interact and get to know each other. In the 2015 Urban Strategy, UNHCR Turkey commits that "advocacy will be conducted with Municipalities at the local level for the inclusion of persons of concern to their assistance schemes and to promote the role of Municipalities in enhancing social cohesion with the local community through social and cultural activities." In Istanbul, there is a promising pilot to take this one step further (in 2016) and to create mixed District level committees of Syrian and Turkish representatives to address challenges of co-existence issues. The concern expressed by UNHCR partners is that these activities are too small scale, too scattered, and not strategic.  In particular, they are not enough to cope with expected increase in stressors in 2016 as the Turkish economy continues to struggle and Turkey prepares to receive asylum seekers back from Europe.

## Strategic communications

A key component of enhancing social cohesion is to frame the way that Syrian refugees are perceived in Turkey.  As one interviewee put it succinctly, unless UNHCR and its allies get out in front of the media and public opinion, in Turkish, then refugee perceptions by the Turkish public will be shaped by others who are less informed - and who might have different objectives.  Especially in Turkey, where the emergency is large and complex but information is also in short supply, there is a premium on having a proactive and well-resourced strategic communications function – a **regular and predictable flow of analysis and data packaged in a form that is readily digested and used by stakeholders.[157]**

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[153] Interview notes

[154]  World Bank. Turkey's Response to the Syrian Refugee Crisis and Road Ahead, December 2015, p. 9

[155]  Brookings Institution and USAK, 2013; ORSAM, 2015a; HUGO, 2014

[156]  A leading proponent of this "ticking time bomb" view is Bazac Yavcan, see Governing the Syrian Refugee Crisis Collectively: The View from Turkey; 2016

[157] One senior Turkish interlocutor very specifically asked that UNHCR not disseminate key information simply by directing partners to a website, but that UNHCR make the effort to push out periodic and relevant e-mails directly to key stakeholders, with key information and especially analytical studies or lessons learned that can help stakeholders improve their response

**Finding 65.     UNHCR Turkey did not have an adequate communications strategy at a time when communications needed direction and purpose**

Currently the information that is available in English, Turkish and Arabic on three different websites[158]as well as on Facebook and various corporate and personal twitter accounts is difficult to navigate, some components are out of date, and in general the emphasis is on three aspects of communications: (a) reflecting UNHCR corporate messaging (i.e. celebrity activity or the release of agency reports), (b) information about unmet Turkish needs interspersed with stories about UNHCR activities in Turkey, mainly with heavy UNHCR visibility branding for fund-raising purposes, and (c) information in Arabic to help refugees understand their legal and service delivery context. The information is quite UNHCR-centric, and does not appear to be framed by a strategy that gives direction and purpose to communications.

One dimension of public perceptions to be addressed is the portrayal of Syrians as "guests", as victims, as needing charity.  This will be sensitive because at the outset this image of the Syrian refugee was actively encouraged by Government messaging and is rooted in conservative Muslim ideology, which sees Syrian refugees as benign but dependent foreigners.  While the "charity approach" is itself worthy and has greatly benefited the Syrians so far by driving the massive public spending on camps and the outpouring of community and municipal charitable donations, the welcome is wearing thin.  As time goes on, the scale of the refugee influx and the realisation that it will not be ending soon have tested the limits of charity and revealed that it is not sustainable.  Instead, what is needed rather urgently is the elaboration of and advocacy for a new paradigm where Syrians are seen as economic actors, neighbours, and contributors to society.

Changing public perceptions is not easy or quick.  It needs a clearly defined plan developed in close concert with Government and other stakeholders, particularly shapers of domestic opinion such as academics, parliamentarians and civil society.  It needs to mobilise a wide range of channels and in the current context to have a big focus on social media and journalists.  And it needs resources: resources to develop successful images and messages in Turkish, resources to engage with stakeholders to disseminate those messages, resources for training, and resources for partners to actively mount professional and sustained information campaigns.

**Recommendation 17.     UNHCR Turkey should work with its partners to develop a Strategic Communications Action Plan to underpin the Protection and Solutions Strategy as recommended elsewhere, with a primary emphasis on supporting social cohesion, and a secondary emphasis on fund-raising**

Elements of such an Action Plan could include four different target groups, each with specific messages and in language media, along the lines of Figure 6.1 below.  Two of the target audiences should be donors (globally and their Turkey representatives), and the other UN agencies (as discussed in Chapter 4):

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[158] UNHCR HQs/Global Focus, UNHCR Turkey and the Turkey pages of the 3RP

*Figure 6.1*     *Elements of an action plan for Strategic Communications:*

**Target: Turkish public**

- Who are the refugees?

- Why should Turkey help them?

- What is the government doing?

- *Turkish medium*

**Messengers: Turkish government, Turkish partners, media, academics**

**Target: UN system and partners**

- What is UNHCR's role (UNCT)?

- What are all UN agencies doing (3RP)?

- What is UNHCR's strategy (UNHCR HQs)?

- *English medium*

**Messenger: UNHCR management**

**Target: Refugees**

- What are refugee rights and obligations

- What services are available to refugees

- How can refugees succeed in Turkey

- *Arabic medium*

**Messengers: Turkish government, Implementing Partners, UNHCR**

**Target: Donors**

- What are refugee trends?

- What are refugee needs?

- What is UNHCR doing?

- *English medium*

**Messenger: UNHCR external relations**

UNHCR's role in communicating to the Turkish public will be sensitive as UNHCR is not perceived to be neutral, and UNHCR itself keeps a low profile in Turkey.  The evaluation team also heard from its primary NGO partners that the visual and written public messaging provided by UNHCR about Syrian refugees in Turkey is sometimes inappropriate and can reinforce negative stereotypes.  So, the more likely role for UNHCR here would not be as the main messenger, but as the enabler: the creator of the action plan and then the enabler of other Turkish actors (implementing partners, national civil society, religious leaders, municipal authorities, media outlets, bloggers and documentary-makers) who in turn will conduct the messaging.[159]

# Engaging with local authorities

**Finding 66.**     **Municipal authorities have difficulty planning with certainty because actual refugee numbers are different from registered numbers**

Municipal governments are the primary providers of assistance to the 90% or approximately 2.7 million Syrian refugees residing outside of camps.  Most importantly, municipal authorities are the front line in

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[159] UNHCR has made important steps in this direction, for example through communications training for 50 staff of partner agencies in June 2015

analysing, anticipating, preventing, managing and resolving social tensions between refugees and nationals. Municipalities along the Syrian border are under the greatest stress,[160] but because Syrians were initially seen as guests and (unlike non-Syrians) were allowed to settle and register wherever they preferred, Syrians are found in large concentrations in major cities, especially Istanbul,[161] and scattered throughout smaller cities (see Figure 1.3). Since registration took place in 2014-2015, refugees are only entitled to receive services in the municipality where they are formally registered,[162] but until very recently nothing prevented their movement, and large numbers of Syrians move to locations where they can find work. As a result, although the location of registrations is known, the actual locations of refugees can be very different; for example, up to 500,000 Syrians (mainly men and boys) were reported to migrate as seasonal labourers on a six-month circuit throughout Eastern Turkey where they are neither registered nor entitled to receive services,[163] presumably leaving women and girls in the camps or cities where they are registered. Furthermore, large numbers of Syrians (both registered and unregistered) move temporarily to the departure points for a Mediterranean crossing or to third locations for work. Analysts, particularly Turkish academics, have started studying the social and economic impact of Syrian refugees in Turkey,[164] but the protection and assistance implications of such huge internal movements (and the vulnerabilities of split families) are not well understood and merit further study.

In order to understand how UNHCR engages with local governments, and in turn how those local governments engage with refugees, the evaluation team visited six different locations and divided them into three categories: (1) locations where UNHCR is not present; (2) locations where UNHCR has a limited presence and/or engagement; and (3) locations where UNHCR is present and engages fully.

| Finding 67. | Refugees receive services from a wide range of service providers, requiring UNHCR to engage with local authorities in different ways depending upon the refugee context and the extent of UNHCR capacity in each region |
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In the cities where UNHCR is not present, Bursa and Konya (each with 80-100,000 Syrians), municipal governments together with national (usually Islamic) charitable NGOs provide cash, goods and services with loose reference to national policies and norms, and with little understanding of UNHCR.[165] Both of these cities welcome refugees and have become havens for Syrian businesses. Additionally, there are sophisticated local registration schemes for the purposes of tracking and targeting assistance,[166] a division of labour between service organisations (education, health, clothing distribution, marriage arrangements), and there is reportedly a high level of social cohesion, in part built on local traditions of receiving refugees (known by the term "*muhacir*") from the former Ottoman empire. In both Konya and Bursa, and we would presume in similar locations throughout Turkey, the refugee operation runs on Turkish resources, organisations and principles, with little or no INGO or UN support, thanks to favourable

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[160]Turkey's Response to the Syrian Refugee Crisis and the Road Ahead, World Bank – December 2015

[161] Officials estimate there were 600,000 Syrians in Istanbul and that "80% of these Syrians need support", although the official statistic is 390,000

[162] Transfer of registration to other municipalities is permitted in some circumstances

[163] Multiple informant interviews

[164]Effects of The Syrian Refugees on Turkey, prepared in Cooperation between ORSAM and TESEV, ORSAM Report No: 195, January 2015

[165] Indeed, the evaluation team received the impression, at least in Bursa, that local faith-based NGOs would not welcome the intrusion of international NGOs or UN actors

[166] Reportedly down to the shoe sizes of registered refugees

economic conditions, enabling government authorities and a dynamic philanthropic sector. While there is no denying that Syrians in these situations have benefitted from a huge outpouring of well-intentioned official and public support as well as the protection benefits that come with that - and at a scale well beyond anything the international community could have provided – the absorption of Syrians into the prevailing local culture brings with it some risks for the long term, and in particular the risks of early marriage, child labour and institutionalisation of orphans that are more easily tolerated in conservative circles.   The evaluation team suggests that these are the areas for attention in community-based protection and urban strategy outreach to these and similar regions of Turkey.

In a second model, in cities where UNHCR has some regular interaction with local authorities, for example Sanliurfa, Hatayand even Gaziantep (cities with about 400,000 refugees each), UNHCR has a local office but primarily relates to refugees through proxies: implementing partners and community centres.  In these cases, where UNHCR's presence is insufficient in relation to the size and spread of the refugee population, its direct engagement was found to be ad hoc and mostly ineffective.  If we take community services as an example, the implementing partners initially referred difficult cases uncovered in community centres to UNHCR for advice and onward referral for specialised support.  But as time has passed, the implementing partners have become more experienced and capable, and UNHCR has become less able to deal with the rapidly growing volume of individual cases, with the end result that partners are increasingly resolving cases directly with local institutions and service providers.  Overall, this evolution towards greater capacity and autonomy of the implementing partners is viewed by the evaluation team as progress, and this suggests that in these circumstances UNHCR's primary value-added is in building up the capacity and especially the outreach capability of UNHCR's key partners, notably the community centre operators and local NGOs, and to a lesser extent PDMM and local government.

The third model of engagement with local authorities is that practised in Istanbul, and which can be characterised as "leading through training."[167]  In Istanbul, UNHCR is working with established implementing partners and others funded directly by donors to support a network of 6 community centres.  However, since the majority of the refugee population in Istanbul lives in the peripheral areas of the city, and the size of that population is so large, UNHCR Istanbul has gone one step further and mobilised a second coalition of interested parties: The Union of Marmara Municipalities.  By working through the regional association of municipalities, UNHCR Istanbul is now able to provide information, guidance, technical support and training to a much wider range of stakeholders, and stakeholders with a direct role not only in service delivery but also in the analysis and management of possible points of friction between refugees and the host community.

Given the legal operating environment and the long history of case-management in Turkey, a special kind of local engagement exists between UNHCR and local Bar Associations.  This has proven to have a significant multiplier effect, as training specifically upon refugee law (hitherto unavailable) and more generally on International Human Rights, the Code of Criminal Procedure, Women's Rights, and RSD procedures has unlocked the provision of free legal aid to refugees and migrants, and extended reach for individual cases well beyond anything UNHCR itself could provide. Again, UNHCR's tactical support by providing Arabic interpreters was highly valued by the Bar Associations and greatly increased access at relatively low cost.

One thing that all three models of UNHCR engagement have in common is that in every case it is the local government that is in the driver's seat when it comes to understanding and managing the risks of social

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[167]The Istanbul approach of "coordination through training" has been described earlier in this report

tension, and each municipality has its own local ways of tackling those risks: for example through inclusion of refugees in consultative mechanisms, targeting assistance, addressing the service gaps that are the source of social tension, or actively building mechanisms for mutual understanding and dialogue. Understanding how each municipality[168] tackles these issues, and then adjusting to go "with the flow" and encouraging varied locally-owned approaches, is likely to be a core task of the multi-functional field teams in the future, and a key to success of the community-based protection approach.

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In 2015, UNHCR Istanbul held a strategic planning exercise with the Union of Marmara Municipalities that considered the region's capacities, constraints and limitations, and started to develop a systematic map of refugee services. This exercise also generated ideas for future coordination and information-sharing including:

1)  Municipal commitments to include refugees in their consultation processes and specifically the proposals to create a sub-council for Syrian nationals functioning under the city councils, and a task force to coordinate assistance efforts towards refugees

2)  Creation of a local NGO platform to liaise with refugees and including the proposal to establish a "Syria Coordination Centre" to institutionalize and systematize assistance mechanisms

UNHCR committed to support these initiatives by:

3)  Facilitating coordination meetings with Istanbul municipalities to help establish common standards and information-sharing platforms to share updates on the evolution of the Turkish legal framework as well as good practices

4)  Supporting the Union of Marmara Municipalities in organising capacity building and coordination as well as policy related activities with district municipalities

5)  Helping to design an electronic (e-mail/web) platform and database that will support municipalities to identify vulnerable refugees, to plan, and prevent overlapping of services

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## Finding 68.     City councils, national and regional municipal unions and *mukhtars* are key partners in enhancing social cohesion in urban areas

Finally, in Turkish society a key figure is the *mukhtar*, a respected spokesperson for the community, chosen for his leadership skills, and with responsibility for identifying community needs and problem-solving. *Mukhtars* could be pivotal in enhancing refugee inclusion, and could also undermine social cohesion if they are not supportive, so *mukhtars* should be a key target group for UNHCR training, workshops and community outreach.

**Recommendation 18.     UNHCR Turkey should actively engage with municipal authorities in all refugee-hosting regions, inventory the relevant services provided by municipalities (including MHPSS, SGBV referral mechanisms, community centres and refugee support groups), and then (a) work with municipal governments to anticipate and manage risks of social tension, and (b) enhance existing municipal capacity to include refugees**

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[168] In some cases, the preferred partners would be City Councils, which are themselves multi-functional bodies formed by Article 76 of Law 5393

> **Finding 69.** **UNHCR's investment in Turkish language training, Arabic interpreter training, and in financing interpreters for key government offices was one of the most efficient and valuable contributions made by UNHCR in Turkey**

One common theme that emerged throughout the team's data collection, and that merits being highlighted as a separate cross-cutting finding, is the great benefit from multiple points of view (social cohesion, protection, efficiency, sustainability) of **focusing on the problem of language**. This is something that UNHCR has done well, and arguably should do even more systematically and as much as resources will allow. In Turkey, where a huge population of refugees have unprecedented access to quality government services but only in a foreign language, language has become a pivotal issue. This goes both ways: Syrian refugees need to learn Turkish especially to access education and jobs and to participate in community life, and government officials need Arabic-Turkish interpreters in order to provide individual services including registration, legal aid, health services and MHPSS. UNHCR's training of Arabic-Turkish interpreters (who often become the front line of community relations and service provision) was a **very strategic and cost-effective intervention with a substantial return on investment, and was signalled by Government and partners alike as one of the most significant contributions of UNHCR.**

## Refugee community empowerment and representation

UNHCR defines empowerment as a "process through which women and men in disadvantaged positions increase their access to knowledge, resources, and decision-making power, and raise their awareness of participation in their communities, in order to reach a level of control over their own environment."[169] In line with this principle, UNHCR worked closely with AFAD and camp managers, and advocated for refugee representation in camps that is diverse in age and gender, and based on the traditional *mukhtar* system found in Syrian and Turkish society.[170] Recreating representative structures that were recognisable to all stakeholders was effective in bringing a sense of security and continuity to the refugee population, and enhanced acceptance and ownership of both the refugee population and host communities. The *mukhtar* network had reached 91% coverage by the end of 2014,[171] and in 2015 the focus for UNHCR was on establishing representative committees in urban areas through community centres.

Starting in 2014, and partly in order to work around the male-dominated *mukhtars*, UNHCR began to encourage women's and youth committees in camps and urban areas, with the aim of increasing refugees' access to knowledge, resources, and decision-making power, to raise the level of community participation in community governance; and eventually to develop more resilient communities.[172] Urban committees were linked to host communities as well as to local NGOs and authorities. Host community experts (lawyers, doctors) invested their time in these committees: if a committee has a health focus, for example,

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[169]A Practical Guide to Empowerment: UNHCR Good Practices on Gender Equality Mainstreaming, L. Taylor and W. Stone, UNHCR Geneva, June 2001

[170]COP for Turkey 2014

[171]COP 2014 Year-end Report, internal UNHCR document

[172]COP for Turkey 2014 and 2015

then UNHCR field staff invited local partners from the health sector.[173] Whenever possible, UNHCR field teams attended refugee committee meetings to provide guidance and support.[174]

| Finding 70. | UNHCR's community empowerment activities in camps and urban areas embodied the key components of UNHCR's community-based approach,[175] and increased community capacity |
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Although UNHCR advocated for equal representation of women and men, very few *mukhtars* are women. The evaluation team noted that in both camps and urban communities, gender roles tend to be quite rigid and complex, and women continue to face significant barriers in terms of their participation in decision-making and representative structures. The evaluation team was only able to meet with one women's committee,[176] but this meeting confirmed the challenge of transforming gender roles since gender stereotypes still prevail in Turkish as well as Syrian society.

Refugee representation cannot however be taken for granted, and needs active support and maintenance. The evaluation team heard of committees that were struggling to maintain momentum because they initially had expectations that committee members would be compensated for their participation, and another case where a women's committee had become discouraged because its members could not see short-term results in terms of economic or social improvement. Finally, the team was made aware of the risk that untrained or poorly selected committee leaders could lead their committees astray and possibly undermine social cohesion. Especially in urban contexts far from view, it will be important that refugee leaders are trained on how to identify problems and interact on a daily basis with existing local stakeholders such as housing authorities, community centres, social enterprises, credit suppliers, adult education initiatives and skills training facilities.

> Good Practice: Rehanli Women's Committee has been successful in promoting training for camp women and advocating with camp and municipal officials on behalf of refugee women.
>
> The Women's Committee in Osmania camp mobilised women to checkprices in camp and urban markets to make sure refugee families pay fair prices for food and other necessities.

| Recommendation 19. | Together with local partners, UNHCR Turkey should continue to support camps and municipalities in the establishment of representative and consultative mechanisms for refugees, and actively support the selection and training of effective refugee representatives |
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## Support for host communities

UNHCR clearly recognises the need to work with host communities and to support them to address the challenges they face – as a key element of social cohesion. One of UNHCR's Global Strategic Priorities (2014-2015) is "promoting active participation in decision making of people of concern, and building

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[173] Interviews with UNHCR staff, February 2016

[174] Interview notes with Hatay and Gaziantep UNHCR field staff

[175] A Community-based Approach in UNHCR Operations; UNHCR 2008

[176] Interviews with women committee in Kahramanmaraş

coexistence with hosting communities". Consistent with this, a key component of the 3RP is "to strengthen the capacity of the local economies to absorb the increased labour force and that of the local institutions to provide employment services to all Syrian and local workers." And the 2014 RRP[177] also included a focus on host communities, specifically the objectives that (a) the most vulnerable host communities benefit from improved access to quality essential services and access to livelihood opportunities, thereby ensuring that an increased number of refugees benefit from community based protection, (b) Syrian refugees living in camps and in host communities benefit from access to livelihood opportunities, (c) reinforcing the agricultural livelihoods of rural communities hosting Syrian refugees through the provision of short-term subsidies for key agricultural inputs and capacity development in good agricultural practices, and (d) supporting local municipalities towards the development of an effective Urban Strategy.

| **Finding 71.** | **Despite a conducive policy framework, UNHCR and UNDP were not sufficiently funded to significantly support host communities or livelihoods, nor were they equipped with the skills to do so effectively** |
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Regarding the 3RP, it is only since 2015, with the transition from the RRP (Regional Response Plan) to the 3RP (Regional Refugee and Resilience Plan), that we find a strong emphasis on resilience and the need to shift focus from relief to economic development. Unfortunately, the 3RP appears to have been hampered by serious underfunding, with Turkey the least funded in relation to other 3RP countries. According to UNHCR's mid-year report for 2015: "*UN and aid agencies continue to supplement the government response to the Syrian emergency under the Regional Refugee and Resilience Plan (3RP) framework. As of June 2015, Turkey's component to 3RP was 20% funded. While still lower than the regional average of 24%, it was a significant increase compared to previous years, an indication of increased international commitment as the result of tireless advocacy by the Government and 3RP partners*."[178] Also unfortunately, while a large number of proposed activities are included in the 3RP, there is no prioritisation of these, and no clear message given to donors as to which funding needs are more urgent or important

In 2014 UNHCR funded a project "Mitigating the Impact of the Syrian Crisis on Host Communities in Southeastern Anatolia Region." The project aimed to "build community resilience and contribute to longer-term development in line with three-track approach of the UN policy for post conflict employment, income generation, reintegration" in host communities in Kilis, Sanliurfa, Gaziantep and Hatay. The project had two components: increasing the municipal capacity for solid waste and sewage management in camp and non-camp settings by purchasing new equipment, building infrastructure and providing technical assistance; and a second component to rehabilitate an olive oil processing facility in Kilis, mainly for the benefit of vulnerable Turkish households living in the vicinity of the refugee camps. The evaluation team was informed that the factory was in operation, albeit on an intermittent basis, but was also informed that the project lacked sufficient planning and prior information gathering. No refugees had been engaged as workers, and indeed it was not clear if that had been the intention. The evaluation team was not able to form an independent opinion on the performance of this project for either economic growth or social cohesion, but did note that this whole enterprise was the tiniest drop in the bucket compared to the economic needs of both Turkish nationals and Syrian refugees in these stressed regions

> "
> *UNHCR training helped us understand that the receptionist sometimes acts as a social worker, and the social worker sometimes acts as a receptionist - this training has made a big difference in the way we treat and receive the refugees who come to our centre*
>
> *–Implementing Partner*
> "

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[177] 2014 Response Plan: p. 62

[178] UNHCR mid-year report June 2015 p. 2

than others.  In the circumstances of chronic underfunding, and in the absence of an argument for priority to host communities or confidence in the capacity of UNHCR and UNDP to provide such support, combined with the strong assertions of the Turkish government of their own capacity to support refugees through government systems, UNHCR programming for host communities was below expectations and (somewhat confusingly) well below host government expectations.

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| **Finding 72.** | **Even though UNHCR does not have the resources to finance programmes benefitting the host community, it missed opportunities to systematically advocate for others (donors and development actors) to fill that gap** |

In the absence of UNHCR funding, the evaluation team searched for signs that UNHCR had guided donor funding and other partners, especially INGOs, directly towards host communities.  While several NGOs are working with host communities (for example both the Danish Refugee Council (DRC) and Refugee Education Trust are preparing ambitious programmes in the areas of livelihoods and resilience), these projects do not appear to be connected with UNHCR nor are they included in the 3RP (which does not include INGOs in Turkey).  Instead they seem to be the result of NGOs coordinating among themselves and being drawn into host community programming by a new influx of European funding for Turkey.

UNHCR's March 2015 Urban Strategy has four main components: communications and outreach, community-based protection, partnerships, and self-reliance, and is a good basis for framing UNHCR's future engagement with local governments.  But it seems to be missing a component of supporting (or at least encouraging) economic development for the host community in refugee-affected areas, and therefore lacks this bridge to the resilience dimension of the 3RP, which could be supported through UNDP's efforts.

## Community centres

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| **Finding 73.** | **Community Centres have been effective in reaching out-of-camp populations, but delivering cash and CRIs through Community Centres was disruptive to the Centres and to the host community** |

Evaluation participants from all sides - UNHCR, partners, donors and Turkish authorities - recognise the importance of the Community Centre model as a means of providing services and outreach to Syrians. These centres have emerged as the key reference points and one-stop service centres for refugees outside camps: providing information and advice, interpretation, language courses, legal counselling, MHPSS counselling and support groups, day-care and child-friendly spaces, among other services.  The only major problem encountered by Community Centres was when they were temporarily mobilised as the medium for delivering cash and CRIs – an understandable convenience from one point of view, but one which ended up greatly disrupting the work of the centres - and the problems of crowd control tested immediate neighbourhood relations. From the model developed through the 2013-2015 period, the Turkish government and TRC are now considering how to take this approach to scale: in Istanbul, for example, PDMM is seeking funding for its own Community Centres.

While existing Community Centres do not yet reach even 15% of the total refugee population, they are nonetheless known to a larger number of refugees than those who have direct access, and they provide a stepping stone for needs assessment, service delivery and outreach activities in line with UNHCR

Turkey's 2015 Urban Strategy. Community Centres that both provide services directly and refer clients to other local service providers seem to be the most efficient.

The need for Community Centres (also known as Multi-Service Centres) was not evident at the outset, when the size and character of the urban population were poorly understood. In 2013, at a time when UNHCR had little leverage and was still trying to gain access to camps, it was donors and path-finding NGOs like IMC that started insisting on and then financing out-of-camp services. In 2014, a first workshop with partners started to consider harmonising the activities and service standards of community centres, and by the end of 2015 they had become the norm – with UNHCR funding all or part of 28 community centres (some of which provide full service, and others being women's centres, language centres or child-friendly spaces) spread across the Southeast and Istanbul.

The Community Centres are to some extent now victims of their own success – they have grown so fast in number and variety that UNHCR has difficulty keeping up and there are concerns about dilution of quality: for example one organisation stating that "*UNHCR does not carry out monitoring visits to the centre that involve the substance of their work, but only monitor on administrative and financial matters."*[179] Interviewed Community Centre staff expressed a desire for more standardisation and capacity building rather than more growth: "*there is a need for more systematic and effective cooperation and coordination with UNHCR and between NGOs. Improved coordination in referral mechanisms and more opportunities for sharing of experiences (case work) are also needed."*[180]

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### *Community Centre services*

Identification of vulnerable cases (for referral, material assistance or resettlement)

Turkish language classes

Life skills training (for example sewing, carpet weaving, basic life skills, and non-formal education)

Child-friendly spaces, sometimes including educational play and basic Arabic for children

Cash assistance and/or CRIs (one-time cash assistance or in-kind assistance)

Psycho-social counselling

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**Finding 74.    The high recurrent costs of operating high-quality Community Centres are not sustainable or efficient**

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**Case study:** ASAM Multi Service Centre in Gaziantep. Established in 2014, the Centre was targeting 20,000 refugees at the start of the project. To date (early 2016), they claim to have reached 50,000 refugees and provided essential services including legal and health counselling, primary health services, mental health and psychosocial support activities, referrals to other related institutions as well as social activities including language courses, awareness-raising activities, training on parenting, nutrition, and childcare. The centre has 60 staff working including one project manager, two clinical psychologists, interpreters, admin and finance persons, project assistance, a peace building officer, reception, security officers, and nurses.

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[179]Interview at a Community Centre, February 2016

[180] Ibid.

The drawback with "five star" Community Centres such as the one profiled in Gaziantep is their high cost: each full-service Community Centre costs approximately $1 million per year,[181] and depends upon year-to-year external funding in an uncertain donor environment.

Given this widely-recognised constraint, there are two schools of thought as to how to develop the Community Centre model over time.  One school of thought (apparently favoured by Government and encouraged by INGOs with independent external funding) is to create ever more Community Centres and over time to harmonise them with Turkish government community service delivery.  The two obstacles this approach needs to overcome are (a) a technical weakness on the part of PDMM and local authorities to develop "donor-ready projects" that comply with exacting (especially EU) donor standards; and (b) a jurisdictional and legal gray zone concerning the mandate for local governments to develop programmes specifically targeted for refugees and asylum-seekers.  These are both areas where UNHCR's support could be most helpful to Turkish authorities.

The other school of thought is to limit growth in Community Centres in favour of extending their reach by favouring greater referral pathways to other local service providers, and community outreach from the platform of the Community Centre, providing broader but shallower coverage through the mobilisation of refugee outreach volunteers and the strengthening of refugee representation.  In practice, both approaches have merit and there is also room for them both, provided that there is a clear division of labour between UNHCR and the Government to avoid duplicated effort or an unseemly competition for the same donor funding sources.

**Recommendation 20.   To increase efficiency and sustainability, rather than invest in new community centres, UNHCR Turkey should (a) continue to use all existing community centres (UNHCR-funded and others) as platforms for outreach, so that they can extend coverage and enhance understanding of the persons of concern, and (b) support the Turkish authorities with their plans to increase the number of government-managed Community Centres**

# Livelihoods

## *Legal context*

**Finding 75.      Possibly as many as 400,000 Syrians are working in the informal economy, mostly in poor labour conditions**

During the period under review, Syrian refugees were theoretically allowed to apply for work permits under article 29 of the TPR,[182] but implementing arrangements for that provision were not in place, and the 3,686 Syrians who were reported to have obtained work permits did so on the basis of having received

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[181]  Estimate from UNHCR, whose full funding of six Community Centres is the second largest item in UNHCR's programme budget for Turkey after delivery of CRIs

[182] Syrians in Turkey with resident permits, not under temporary protection, were eligible to apply for work permits

residence permits under different regulations at the beginning of the influx.[183] Thus, the majority of the estimated 400,000 Syrian refugees working in Turkey were in the informal economy.[184] Many were engaged in agricultural labour and unskilled jobs in the textile and service sectors. Because the informal economy is not recognised or protected under legal and regulatory frameworks, this has left Syrian refugees including Syrian children – as well as non-Syrians - vulnerable to abuse and exploitation.[185]

Within this context, UNHCR in conjunction with other agencies (notably the ILO) advocated with the Government for regulatory changes to allow work permits to be issued to Syrian refugees. The draft revised labour regulations were ready in 2015 but their approval was delayed by Turkish elections, and then fast-tracked as part of negotiations with the European Union late in 2015. Evaluation team discussions with various stakeholders concluded that **unless there are further regulatory adjustments most Syrian refugees are unlikely to qualify for work permits, but it will nevertheless have a positive effect** because (a) some key Syrian professionals will be able to obtain work permits, especially valuable if as medical professionals and educators they can provide services to Syrian refugees in Arabic; (b) the fact that work is now allowed at some level removes from employers the need to conceal informal labour, and this in turn could improve the conditions of informal labour; and (c) this opens up the possibility for UNHCR and its partners to openly provide and scale up employment-oriented vocational training and employment counselling.

## *UNHCR policies and planning to promote livelihoods for Syrians*

UNHCR is well equipped with policies and global strategies to promote livelihoods. The reduction of dependency of refugees through economic empowerment and the promotion of self-reliance are central to UNHCR's protection mandate. UNHCR's Operational Guidelines on Livelihoods[186] articulate the need to advocate for refugees' right to work and to pursue livelihoods in all refugee settings. Promoting the right to work and supporting peoples' economic self-reliance are also objectives in the 2014-2018 UNHCR Global Strategy for Livelihoods.[187] While the UNHCR Livelihood Strategy and Minimum Criteria apply to Turkey, they are mainly intended for situations where UNHCR has a direct role in implementation. For this reason, UNHCR needs to take an additional step to define a clearer position on livelihoods, and pin down its "added value" in the Turkish context in relation to its 3RP partners UNDP and ILO.

| **Finding 76.** | **In the evaluation period, UNHCR seemed undecided as to whether it was following a large-scale "economic integration" or a targeted "welfare approach" to refugee livelihoods in Turkey** |
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RRP6[188] and UNHCR County Operation Plans for Turkey contain a clear commitment to develop programmes that will enable the refugee population to enter the legal job market, by building their skills, abilities, and confidence – in particular through skills and vocational training for camp and non-camp

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[183]Perspectives, expectations and suggestions of the Turkish business sector on Syrians in Turkey; TISK-HUGO 30 December 2015; Murat Erdogan

[184] ibid

[185]The Economic Effects of Syrian Refugees on Turkey: A Synthetic Modelling; Orsam Report No: 196 January 2015

[186]Livelihood Programming in UNHCR: Operational Guidelines, UNHCR 2012

[187] Strategic Objectives 2014-2018

[188] 2014 Syria Regional Response Plan, Chapter K on livelihoods

refugees.  RRP6 also includes a more traditional (for UNHCR) "welfare approach" to livelihoods usually managed as part of community services, less focussed on economic integration and instead aiming to provide support for the financial autonomy of the disadvantaged by identifying persons with special needs or at risk, and designing programmes and livelihoods protection models for the non-camp Syrians using an AGD approach.  There is a place for both approaches to livelihoods in a refugee programme, but it is important to note that "integration" and "welfare" objectives are not the same and suggest different strategies and mechanisms.

## *Initiatives taken by UNHCR to promote access to livelihoods*

**Finding 77.     UNHCR's (and fellow UN agencies') advocacy for labour access was partly successful but is unfinished business**

Despite limited resources, UNHCR endeavoured to support refugee livelihoods in several ways in the 2014-2015 period. Firstly, as described earlier, **UNHCR proactively advocated for refugees' right to work and helped get work permits for Syrians on the agenda of the TPR.**[189] This required influencing and working with a wide array of partners, including policy makers, government and civil society leaders, and donors.[190] The TPR article 29 enhances access to employment and self-reliance by Syrian refugees affected by the humanitarian crisis, but as described earlier, it has limitations and needed subsequent regulations to become effective. The subsequent regulations issued in January 2016 go some way to towards improving access, but not far enough since several mobility and quota restrictions have been maintained. **It will be important for UNHCR to continue its regulatory advocacy until such time as most Syrian refugees are actually able to work formally in Turkey.**

Also, in 2014 UNHCR supported UNDP[191] and RET[192] to conduct "**labour market and training needs assessment studies**" to identify viable economic pathways for the purpose of developing demand-led skills training programmes for Syrian and Turkish youth in South and Southeast Turkey. The needs assessments were a sound beginning for the development of a well-planned skills training strategy, and the fact that the RET needs assessment was carried out in cooperation with İŞKUR (Turkish Employment Agency), Public Education Centres and local development agencies increased the relevance of the assessment. However, after reviewing the assessment, the evaluation team felt that it was not sufficiently comprehensive to take into account the rapid changes in the labour market.



A further area of UNHCR focus **was informal technical and life skills training,[193] both in camps and through community centres in urban areas, as well as Turkish language courses** to enhance Syrian refugees' self-reliance. Data was not available on the impact of these courses on fostering

Sewing training in a camp (UNHCR photo)

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[189] Turkey Monthly Update – April 2015

[190] Interview notes with UNHCR Protection Officer

[191] Project Performance Report, 2014

[192] Ibid.

[193] This was not formal vocational training leading to certification of the sort delivered by Turkish institutions

livelihoods and improving refugees' standards of living, and the courses' market linkages were not clear, although anecdotally it seems that the linkage of a sewing training programme and a textile factory in one camp is promising. It is important that the refugees participating in skills training are followed up to find out whether the improved skills are leading to livelihood outcomes, and to allow courses to be adjusted and adapted to the changing and diverse urban context.  In addition to possible livelihood benefits, interviews with partners indicated that this training had positive psychosocial results for the participants (socialization, confidence), "vocational therapy" results that are important to capture but not to be confused with sustainable livelihoods.

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| **Finding 78.** | **UNHCR's programming activities to support livelihoods had very limited impact in the evaluation period** |

Despite these efforts, UNHCR Turkey was not able to effectively support refugee livelihoods and self-reliance.[194] Two reasons cited in the planning for COP 2015 were (a) "income generating and self-reliance activities remain limited inside camps"; and (b) "the majority of Syrian refugees currently have no legal right to work in Turkey, which represents an obstacle to addressing their livelihood needs, although many are believed to be working in the informal sectors of the economy."[195]

| | |
|---|---|
| **Finding 79.** | **In this context, UNHCR's comparative advantage is on the policy and regulatory side, on the enabling environment for refugees to access work, rather more than livelihoods programme delivery** |

With so many Syrian refugees already working, it would seem in retrospect that a more effective approach for UNHCR and its partners would have been to try to improve the conditions and terms in which they are working, rather than try to "create jobs" or "connect refugees with the labour market."  Evidence suggests that Syrian refugees are already well-connected with the labour market – the problem is that this is reportedly in dangerous, informal and/or poorly paid conditions.[196] This precarious work is not addressed by the new work permit regulations (with the important exception of a work permit exemption for agricultural labour – which allows refugees to work in this sector), and suggests that three fruitful avenues for UNHCR and partners to pursue would be (a) further advocacy for the work permit regulations to be loosened so more refugees can qualify; (b) advocacy with Government for regulatory change to allow refugees the right to move officially (move their registration location) to the province where they are working; and(c) advocacy with Government to regularise informal refugee labour in Turkey.[197]

The country has a large private sector including many enterprises owned by Syrians, and the government has strong technical expertise, backed up by mature institutions such as the Ministry of Labour and Social Security, Turkish Employment Agency, and the Union of Chambers and Commodity Exchanges of Turkey (TOBB).  Government itself is concerned with refugee livelihoods and self-reliance, and İŞKUR is leading the Working Group on Employment for Refugees, set up by the Chief Advisor to the Prime Minister on refugees and containing Ministry of Labour, ILO, employers' and workers' organizations, Chambers of Commerce, and other related governmental organizations.  The future for refugee livelihoods in Turkey

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[194] Annual Report on the 2014 COP

[195] COP 2015 narrative

[196]Turkey's Response to the Syrian Refugee Crisis and the Road Ahead, World Bank, December 2015, p. 6

[197] Informal labour is a problem for Turkish society not just refugees, and an area where Turkish trade unions and labour activists could enter into alliance with refugee advocates

lies through alliances with these organisations (and with sister UN agencies such as UNDP and ILO), and not through stand-alone UNHCR-funded livelihoods projects. It has been argued earlier in this report that, in the Turkey context, livelihoods is not an area of UNHCR experience and comparative advantage. To the extent that there should be active livelihoods programming (vocational training, credit projects, small business development), the evaluation team concludes that, in an inter-agency division of labour and especially given the 3RP context of resilience and increased development focus, this domain should be coordinated by UNDP.

**Recommendation 21.** **Regarding Livelihoods, UNHCR Turkey should focus on where it can best add value: (a) upstream work on advocacy, policy dialogue/advice, and regulatory reform related to refugee employment, including the right to re-register where refugees have found work; (b) support for skills assessment (in conjunction with vulnerability assessment and registration); (c) continued investment in Turkish language training; and (d) promoting greater investment by other UN partners, INGOs, private sector bodies and the Government in the whole spectrum of market-driven and employment-oriented technical training (from life skills, to skills-specific, to certified formal vocational training in state institutions)**

## Conclusion

While Syrian refugees currently benefit from an exceptional welcome from both the Turkish Government and the Turkish people, this cannot be taken for granted as both the political and economic contexts of Turkey could change. The refugee welcome is wearing thin as it becomes increasingly evident that refugees are going to stay for some time in Turkey, and more visibly compete with nationals for jobs and public services, especially in hotspots where refugee concentrations are high and the local economy is stressed. Anticipating and managing the social cohesion challenges ahead will require active engagement with local governments, stronger refugee representation, proactive strategic communications with social cohesion and not UNHCR fundraising as the goal, more effective outreach from existing community centres, large-scale and visible investment by development actors and INGOs in Turkish communities that are heavily affected by Syrian refugees, and steady advocacy for refugees to increase their access to the formal labour market.

# 7 Planning and Programming

## 3RP and COP

In 2014 and 2015 UNHCR had two planning frameworks in the Turkey situation:[198] the Country Operation Plan, which is a UNHCR plan for internal purposes,[199] and the 3RP, which is a regional interagency planning document containing a Turkey chapter that is effectively an interagency plan for external purposes.  Both documents were analysed in detail for the two target years of the evaluation.

*Table 7.1    Country Operation Plan and 3RP have different scopes, purposes and characteristics*

|  | COP | 3RP |
|---|---|---|
| Scope | UNHCR and UNHCR's implementing partners | All UN agencies including UNHCR |
| Prepared by | UNHCR in consultation with IPs and other partners | All UN agencies in consultation with Government of Turkey |
| Coordinated by | UNHCR | UNHCR and UNDP |
| Main purpose | Providing a detailed plan (protection and durable solutions) for UNHCR | Providing a strategic framework for all |
| Secondary purpose | Resource allocation | Resource mobilisation |
| Style | Detailed, technical, very long | High-level, graphic, brief |
| Orientation | Internal users,[200] programme staff | Public, donors, senior management |
| Reporting | Semi-annual and always late in Turkey | Monthly or quarterly and often late |
| Strengths | Detailed allocation of resources to activities, rolling up to results at the country level compatible with global resource allocation/reporting system | Permits a regionally comparable overview of the response to Syrian displacement across five countries |
| Weaknesses | Constrained by UNHCR standard metrics unsuited to Turkey-like situation of rapid changes in direction led by a strong government and supporting role for UNHCR | Emphasis on funding gaps rather than real time assessment of needs and gaps |

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[198] It is most important to note that the Government of Turkey has drafted a planning framework for Syrians in Turkey for 2016-2018, released in draft form in March 2016.  This a very welcome development and might require all 3RP parties to review their 2016 3RP plans for Turkey

[199] All the UN agencies involved have similar internal annual planning frameworks of varying degrees of complexity

[200] Technically a summary version of the COP is available in a publicly-accessible form through Global Focus

## Country Operation Plan (COP)

The evaluation team found that the Turkey operation's 2014 and 2015 COPs had the same strengths and weaknesses as most UNHCR COPs. Among the strengths, we observed **narratives that were strong** in their comprehensive analysis of the main problems and their strategies to overcome them, but weakened by the fact that **narratives for the next year (for example 2014) are drafted in February and March of the preceding yea**r (i.e. March 2013)- and even though there is a November update this was quickly overtaken by events. This structural problem of all COPs was made worse in Turkey due to the fact that the context of the operation changed very fast – for example at the time of <u>drafting</u> the 2014 COP narrative, the extent of out of camp requirements were not known, the new TPR legislation was not passed, DGMM was not yet created, and the primary emphasis (in response to the Government's requests) was still support to AFAD and camps. The end of year reporting on 2014 shows in many ways both **the extent of UNHCR's response and how little of 2014's activities were foreseeable in March 2013**. Still, with regard to the COP narrative, the evaluation team felt that the **gender analysis was weak,**[201] but confirmed that the **2015 analysis and programming directions were informed by the Participatory Assessments.**[202]

In addition, **the 2014 and 2015 Risk Registers confirm that management in UNHCR Turkey had a comprehensive understanding of a full range of risks and had considered risk mitigation strategies,** although the evaluation team did not analyse the alignment of the risk registers with the operations plans.

## The problem of planning in a context with many unknowns

**Finding 80.**     **The two planning processes (3RP and COP) were timely and each was completed according to prevailing guidelines, but both had weaknesses mainly stemming from unavailability of data**

The COP's planning of activities, selection of results indicators, and estimation of baselines and targets involved a considerable amount of guesswork on the part of UNHCR staff, because of two main variables over which UNHCR had little control: (a) the most fundamental planning variable – the actual size and geographic distribution of the target population - was not known; indeed even after the Government completed registration this information was not provided to UNHCR and external agencies;[203] and (b) the areas that UNHCR would be invited to work in were determined by Government and often on the basis of short-notice requests. So, while UNHCR could anticipate several elements of its 2014 and 2015 planning it could not anticipate with confidence the scale and the nature of in-kind requests for CRIs, the extent of

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[201] See discussion of gender analysis in the Chapter on Protection

[202] In the context of Turkey, where UNHCR generally does not have easy direct access to refugees because of their geographic dispersion, the Government responsibility for registration and the limitations on household vulnerability assessment, the annual Participatory Assessment becomes central as the main mechanism for UNHCR to assess the most important challenges facing Syrian refugees in Turkey

[203] The Government has responsibility for registration of non-Syrians, and as far as we can ascertain, it was only in January 2016 that the Government first published a breakdown of the Syrian refugee population by camp and by province for the out-of-camp populations, and even then, the published data did not provide a gender or age breakdown, or any vulnerability profiling

UNHCR's involvement in registration, how acceptable would it be for UNHCR to encourage self-reliance and livelihood activities outside camps, or whether UNHCR would be permitted to open new field offices.

## *Narrative reporting*

| | |
|---|---|
| **Finding 81.** | **There is a COP paradox: the most valuable elements of the COP are the planning and reporting narratives, which are not generally made public and therefore reach few interested stakeholders; while quantitative elements that are made public and transferred into the 3RP reporting are generally flawed in design, and uneven in quality** |

The narrative reporting on the programme is very complete and provides the single best source for understanding what actually happened during the year being reported upon, and no doubt the drafting of the annual narrative reports provides many opportunities for teams to come together and take stock of what has worked and what has not, and to shape future thinking.  But most unfortunately the detailed narrative reports are not made public,[204] and at 110 pages (2014) they are unlikely to be read in detail by many staff within the operation.

## *3RP*

| | |
|---|---|
| **Finding 82.** | **UNHCR is seriously underfunded, especially relative to WFP, IOM and UNICEF** |

The RRP/3RP is the framework of interagency planning and reporting for the whole Syria refugee emergency.[205]  It is always underfunded, Turkey is always funded even less than the other three countries in the appeal, and as shown in figure 7.1, within the Turkey chapter, **UNHCR is the least funded of the major appealing organisations**: UNICEF, WFP, IOM and UNHCR.[206]

*Figure 7.1      Other UN Agencies attract more funding for the Syrian refugee crisis than UNHCR (FTS)*



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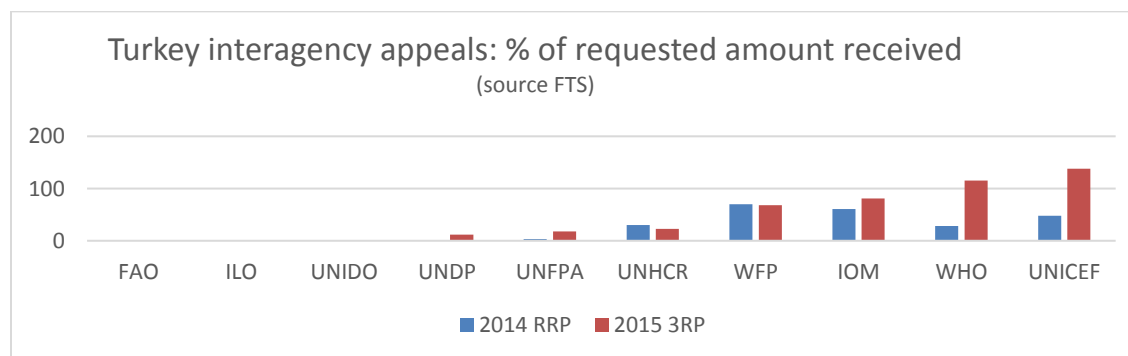
[204] A summary version is made available on the UNHCR website long after the year has ended, but it lacks the sensitivity and depth of the full narrative version, and is published so late that it only has archival value

[205] Excluding the programmes in Syria itself, which are captured in separate OCHA-coordinated Syria Response Plan

[206] WHO is proportionately well-funded, as seen in figure 6.4, but the amount requested is small.  Several UN agencies have been included in the Turkey RRP/3RP and never been funded

One of the central problems of assessing efficiency in a humanitarian context is that the amount of funding received by an agency is not known in advance.[207] Therefore, plans are always greater than funding, expected ("comprehensive") results are always far greater than likely ("prioritised") results, and essentially there is no fixed denominator in relation to which efficiency can be measured.[208] The evaluation team did attempt to quantify results achieved in relation to results expected, and to see if there was a useful correlation between underfunding and underachievement of results, but the nature of UNHCR's activities in Turkey is so heterogeneous, and the indicators so weak, **that a viable quantitative assessment of efficiency could not be derived.**

| Finding 83. | Participating agencies and donors rarely use the 3RP as the basis for planning or resource allocation |
|---|---|

While a regional framework is absolutely required by donors and stakeholders in order to demonstrate that there is a coherent approach between the 3RP countries as well as between 3RP actors within each country, in itself it does not shape anyone's planning or programming priorities.  This is because the 3RP is essentially a high level aggregation of five 3RP national chapters, each of which is in turn made up of all the national-level Agency plans.  The **methodology for developing the 3RP has improved from the RRP6, especially in the move towards an underlying organising principle that is sectoral rather than institutional** (see earlier discussion in the Chapter on Strategic Positioning).  And the methodology for linking the COP to the 3RP is sound as it allows for UNHCR's detailed plans and indicators to be rolled up with those of other participating agencies, with some adaptation of the standard UNHCR indicators to accommodate to the interagency, negotiated and aggregate nature of the 3RP indicators. But there is no escaping that the **3RP as a whole and the 3RP in Turkey both follow rather than determine the plans of participating agencies.**

By the same token, the **donors for the most part decide what to fund based upon their assessment of institutional capacities and agency appeals, rather than on the basis of the 3RP.[209]**  Thus it is that every year the participating agencies invest a huge amount of planning and drafting effort to create a high quality and coherent framework for support to Syrian refugees that **neither the agencies nor the donors actually use as the basis for planning and resource allocation.[210]**  Instead we see a perpetuation of a historical pattern throughout the humanitarian system where donors repeatedly fund the same agencies because of their perceived performance or the inherent political/domestic/media attractiveness of either the emergency or the target sectors, whether or not in any given situation those are really the most efficient investments.

It would be a **significant step forwards in efficiency if donors, acting in the spirit of Good Humanitarian Donorship, agreed to less earmarking against the 3RP**– thus allowing UN coordination machinery at the regional and national levels to determine resource allocation between countries, or between agencies, on the basis of agreed priorities rather than donor preferences.

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[207] This is exactly not the case in a classic development project, where needs are assessed well in advance, planning is detailed, funds are allocated commensurate with relatively stable and known variables, all the requested funds are provided, and then efficiency can be assessed with more realism

[208] Unfortunately, this has two other consequences: one is that it is too easy for UNHCR (indeed any humanitarian agency) to ascribe underperformance to underfunding without risk of repercussions, and that there is no penalty for over-reaching, for example by overstating the expected results

[209] Interviews of five of the major donors conducted in the course of this evaluation

[210] The same argument could be made of many consolidated appeals and humanitarian response plans

## *The Turkey chapter of the 3RP*

### Finding 84.      The 3RP is an improvement over the RRP6

There is widespread agreement that the **Turkey chapter of the 3RP is not only better in quality than the RRP6, but that it has more involvement and buy-in from the Government of Turkey, and that the addition of a resilience/development dimension is a necessary progression** given the protracted nature of the Syrian refugee community and the nature of their needs in the coming years. It is also considered wise to have removed sectoral/agency financial details from the document so as to reduce the temptation of earmarking.

### Finding 85.      Monthly 3RP dashboards are inefficient (at least in Turkey), and a waste of valuable skilled staff resources across several agencies

3RP continues to have some weaknesses, particularly regarding reporting.  First among these is the inordinately cumbersome machinery for reporting results, on either a quarterly or monthly basis (depending on the sectors).  Because of the way the 3RP is constructed sectorally and with different sectoral leads (some of which but not all are UNHCR), and in the absence of a robust IM platform to support the 3RP,[211] the monthly or quarterly results (dashboards) are manually compiled based upon e-mail inputs from all the participating agencies, who in turn have to gather the data from their various implementing partners and field offices.  In 2015, the 3RP had 34 indicators in 8 sectors, and gathering the data for these 34 indicators from ten agencies on a monthly basis carries a huge transaction load – most of which falls on the highly experienced staff responsible for each sector, and whose time would be much better deployed on substance.  Since the quality of monthly updates is doubtful given that meaningful change is not usually measurable on a monthly basis, since donors to do not routinely track the monthly dashboards, and since they are not used to direct changes in planning or priorities, the monthly frequency does not seem justified.  Instead the **management and coordination effort would be better spent gathering more meaningful quarterly information, and then taking the time to use that information to inform mid-year programming course corrections**.

### Finding 86.      3RP reporting does not meet donor expectations and needs to be improved

Second, donors want more in their periodic 3RP reporting than a statement of incremental changes in 34 indicators, a safe neutral description of activities across the region with few country specifics, and a repeated appeal for more funding because the unmet needs remain so high.  What donors want is something more substantive: a sense of specific trends at the regional and national levels, analysis of the evolving political and economic context for Syrians, frank assessment of the operational challenges that agencies are facing, and reassurance that the UN system is constantly evaluating risks and opportunities so it can shift resources from low to high priorities.[212] Given this expectation, it is easy to understand why the current 3RP reporting disappoints, and it should be possible to consider both some internal

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[211] Agencies are optimistic that a new software ActivityInfo, due to be introduced in early 2016, will improve the quality of reporting by moving much of it to a web-based platform

[212] The ideal to strive for would be a briefing that donors eagerly await, that provides refreshed information on trends, challenges and strategies to overcome them, written in a style that the donor agencies can cut/paste into their own briefing notes for senior management and ministers. This reporting should aim to shape the narrative

improvements to the 3RP reporting, as well as additional reporting that is less glossy and provides real time analysis of issues and trends.[213]

**Recommendation 22.**  **UNHCR MENA should move all the 3RP dashboards to a quarterly reporting cycle, and the analytical depth of the narrative quarterly reports should be enhanced to a quality that would provide a strategic quarterly briefing for senior managers of donor agencies, supplemented with offline tactical briefings to key donors**

## Procurement and contract management

### Finding 87.      Many partners felt that UNHCR is spreading itself too thin programmatically and therefore at risk of overpromising and underdelivering

There is a widespread perception among Government counterparts, implementing partners, UN agencies and donors that UNHCR was operationally weak in Turkey in the period under evaluation.  It is inevitable that an evaluation provides an opportunity for stakeholders to gripe about problems or to seek leverage or benefit, and we were not able to validate much of what we heard (partly because of the lack of programme staff continuity).  We can however signal some general issues that were reported by several parties, and that were confirmed by review of project documentation and financial reports.

First among these is the sense on the part of some Government agencies, some donors and some UN partners that **UNHCR is spreading itself too thin sectorally,[214] and taking on projects in areas that are not UNHCR's programming comparative advantage or where UNHCR does not have sufficient expertise**. As a result of UNHCR raising expectations that have not been met by delivery, we heard through interviews that some beneficiaries are not receiving the promised goods or services as expected, some partners and donors are frustrated with slow implementation and inadequate reporting, and some UNHCR staff are placed under severe stress.  Given that the UNHCR programming system is wired in its financial and procurement systems and in its staff skillset for the COP cycle, and for partner agreements and direct procurement based upon funding of the COP, it is understandable that the evaluation team found evidence that **UNHCR is not well equipped to handle special donor projects – and especially not multi-year uniquely designed (not**

The problem of additional funding at year-end

In early 2014 the overall population was estimated as low and donors were uninterested in Turkey, but additional funding flowed in at year end after the scale of the out-of-camp population became known.  In early 2015 donors were again lukewarm regarding Turkey, but by mid-year there was a sudden "European migration" dimension to galvanise donor enthusiasm. In both years, UNHCR received large amounts of additional funding late in the year, and this obliged UNHCR to find ways to spend the additional funding quickly.  While we do not have any concerns about the integrity of this end-of-year spending, its lateness contributed to a somewhat hasty programme of winterisation procurement that might not have been best value for money – particularly given that winter in-kind supplies procured late in the year were delivered after the worst of the winter had passed.

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[213]  The evaluation team was informed by MENA that greater attention has been paid to 3RP reporting in 2016

[214] This seems to be more the case for UNHCR direct delivery than for projects delivered by implementing partners

**boilerplate) projects funded by development donors whose planning and reporting cycles and expectations are outside the normal UNHCR system.**

In some cases, it could be **more of a reputational and performance risk for UNHCR to receive special project funding and underperform, than to decline**. Indeed, the evaluation team feels there is **a strong argument for UNHCR resisting the temptation of stand-alone donor-funded projects unless they are exceptionally large and exceptionally close to UNHCR's existing programming** so that special project management can be harmonised with ongoing work.

**Recommendation 23.    UNHCR Turkey should strengthen its programming efficiency either by investing in more programming capacity so it can manage a larger number of partner agreements in multiple sectors, or by simplifying the range of sectors and aiming for fewer and larger partner agreements**

## *Winterisation: procurement and timing*

In 2012 and 2013, UNHCR Turkey provided Core Relief items to the Government for distribution in Syrian refugee camps through TRC, for an aggregate value of $21.4 million. During 2014, UNHCR reported continued distribution of an impressive range of CRIs for Syrians in camps and in urban locations (see box).

| CRIs PURCHASED BY UNHCR (2014) | |
|---|---|
| **ITEMS PURCHASED** | **UNITS** |
| Cooking facilities (hot plates, cabinets and fridges) | 40,200 |
| Kitchen sets | 75,044 |
| Jerry cans | 197,600 |
| High Thermal blankets | 1,213,538 |
| Medium Thermal blankets | 604,220 |
| Foam mattresses | 270,000 |
| Sleeping mats | 622,000 |
| Plastic sheeting | 24,038 |
| Sanitary napkins | 1,930,880 |
| Hygiene kits | 63,496 |
| Clothing (children) | 30,370 |
| Winter clothing | 552,254 |

**Finding 88.       UNHCR addressed concerns identified by an OIOS internal audit concerning weak distribution controls during early CRI deliveries**

Two challenges were encountered with these distributions: accounting/accountability and timeliness. Regarding the accounting/accountability, UNHCR Turkey's first distributions were the subject of critical comments from an OIOS internal audit, which found that the UNHCR Representation in Turkey must "*strengthen arrangements for the delivery and distribution of core relief items in the camps".[215]*

This recommendation stemmed from observations that "*staff concerned with the distribution could not provide the details,"[216]* the Representation "*did not put in place an appropriate reporting mechanism over on-site and post-distribution of core relief items (...), and did not request the partner of camp authorities to submit reports", (...) "did not have specimen signatures of camp officials for use in verifying the authenticity of the receipts that suppliers attached to invoices as evidence of quantities delivered",* and finally "*the Representation did not have a mechanism to verify the authenticity of these distribution lists."* The evaluation team considered carefully these earlier observations, the exceptional circumstances

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[215]Ibid.  Note that this evaluation report is not an audit and did not consider risks of procurement fraud

[216] These facts are related to a distribution of winter clothes earlier than the period covered by the evaluation, e.g. 27 Nov. 2013

prevailing at the time (for example limited UNHCR access to camps, the weaknesses of the early camp registration system, the extent of Turkish government management control, and the combined political pressures from UNHCR leadership, the Government of Turkey and from donors to urgently release essential supplies) as well as the improved control measures subsequently taken by UNHCR and AFAD, and was satisfied that in the period under evaluation UNHCR has done all it can to bring distribution controls up to satisfactory standards.

**Finding 89.**     **The late and uncertain arrival of funds made it challenging for UNHCR to make adequate preparations for winterisation assistance**

A second set of concerns relates to the perceived slow response to Government requests, and **late procurement of winterisation CRIs as well as late management of winterisation cash assistance**. In 2013-2014, 2014-2015 and 2015-2016 (admittedly beyond the target evaluation period) winterisation distribution of electric heaters, blankets, coats and boots was taking place after the worst of the winter was over, and some of these items reportedly turned up in a resale market at heavily discounted prices. The 2014-2015 distribution of electric heaters outside the camps and in urban areas far from the Gaziantep warehouse created further complications for partners and for the Istanbul sub-office, and the challenge of providing size-sensitive items



UNHCR distributed 60,000 electric radiators costing $2.7 m (HCR photo)

(boots and coats) added another level of difficulty. To some extent this was a consequence of late approval of funding (see box) and late approvals from AFAD, and no doubt compounded by procurement bottlenecks in HQ and in-country as well as a surge in the workload not matched by increased experienced staff, but nevertheless, the evaluation team believes that **the vulnerability assessment and year-end procurement could have been planned further in advance**, so that quality materials were able to be distributed to target populations on time.

**Recommendation 24.**     **Where it is determined that CRIs are more efficient than cash, UNHCR Turkey should ensure: (a) early agreement between UNHCR and the Government of Turkey on beneficiary targeting in areas where e-vouchers or cash assistance will be hard to put in place;(b) early definition of the scope of the winterization programme; and (c) early preparations for procurement and delivery of CRIs**

**Finding 90.**     **UNHCR responded well logistically to more classic emergency influxes at Kobane/Suruc and Akçakale**

Finally, it is important to mention that UNHCR was widely considered[217] to have responded well to the logistical challenges of an "emergency within the emergency," when some 170,000 refugees flooded across into the Turkish region of Suruc from Kobane in September 2014. At that moment, UNHCR airlifted CRIs from its central stockpile, and complemented these with locally produced items available at competitive prices. In the second half of 2014, UNHCR Turkey greatly enhanced its logistics infrastructure (framework agreements for CRIs, transport network, warehousing, inspection and customs clearance services), as a result of which it issued 673 purchase orders with a total value of more than $60 million

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[217] Interviews with partners and senior AFAD officials

and handled more than 20 million items in its four warehouses.[218] Simultaneously, UNHCR initiated two new partnerships to boost the distribution of humanitarian assistance in urban and rural areas in the region of the influx, and supported the Government to set up a new camp with a capacity of 30,000 beneficiaries while providing support to other nearby camps (Nizip, Islahiye, Nusaybin and Derik), as requested by AFAD.


Syrian Kurd receiving distribution (UNHCR

## Particular constraints experienced by national NGOs

| Finding 91. | National NGOs were disproportionately affected by slow negotiation and approval of agreements |
|---|---|

A different set of timing concerns surrounds the **slow negotiation and approval of agreements with Implementing Partners in 2015** (2014 does not appear to have been delayed). Globally, UNHCR works most often with international NGOs who have strong corporate weight in negotiations, who are accustomed to how UNHCR works, who have financial reserves that can tide them over short-term funding breaks, and who receive much-needed contributions to their HQ operating costs from UNHCR in addition to the direct programme costs. National NGOs do not have these same advantages, in particular they do not have UNHCR support for their Ankara-level corporate overhead costs, and yet they are both essential and cost-effective in the Turkey context. By delaying signature and first payment of several NNGO agreements until March, April and even May, in 2015 UNHCR placed unnecessary stress upon local partners, and risked interruptions in service delivery.

**Recommendation 25.** UNHCR globally should make it easier for national NGOs to work with them, in particular by: (a) including as many NNGO corporate management and head office costs as possible within the direct costs portion of project budgets; (b) prioritising NNGO partners for annual negotiation of agreements, to provide greater continuity of financing

## The choice between in-kind or cash assistance

| Finding 92. | Although cash has become the preferred medium for assistance, there is still a place for in-kind assistance in camps and for response to mass influxes |
|---|---|

All implementing agencies including UNHCR and the Government have embraced some form of cash or e-vouchers as the preferred method for future delivery of assistance in Turkey. This begs the question: is there still a place for in-kind assistance? The evaluation team concluded that there is justification for a programme of replacement of damaged camp items (notably tents and mattresses), and there is a strong argument for building, using and replenishing a stockpile of essential relief items that can be deployed in case of emergency influxes. The stakeholder consensus was that **henceforth in-kind items should be limited to emergency stocks for sudden influxes (tents, blankets, solar lamps, cooking kits etc.) and replacement of used items in camps (tents, mattresses), and that the rest of the material assistance for normal distribution to vulnerable groups or for winterisation should be provided as e-vouchers or cash.**

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[218] Turkey 2014 Year-End Report Narrative Reporting, "Refugees and Asylum Seekers from Syria in Turkey"

The coordination of Cash-Based Interventions (CBI) was late to develop in Turkey (November 2015), and the technical working group[219] is now working intensely on issues such as coverage, reducing duplication, standardisation of packages, training, market price monitoring and targeting criteria. There is a very wide range of CBI actors including municipal governments, national and international NGOs implementing schemes funded by their own resources, government resources or directly by donors, UN agencies, and the Government itself mainly through TRC. Some of this assistance is conditional, some is not; some is intended for basic needs, some for food, some is tied to specific suppliers; some is cash transfer, some is debit card, some is e-voucher. In this crowded environment, it is certain that UNHCR is not the major player, and it is not entirely clear what UNHCR's comparative advantage alongside others may be.

**Recommendation 26.**   **Where it is determined that Cash-Based Interventions (CBI) are more efficient than in-kind assistance, (a) UNHCR Turkey should scale-up cash (in preference over e-voucher) assistance in those locations and sectors where UNHCR has a comparative advantage and in close coordination with other cash actors, and consider providing this assistance to women rather than to men; and (b) stop the provision of CRIs to out of camp populations once effective CBI schemes are properly in place**

## *UNHCR's results planning and reporting framework*

**Finding 93.**   **UNHCR Turkey does not have dedicated professional M&E capacity and so monitoring and reporting functions are part time activities fitted alongside everything else**

Analysis of the reported end of year performance against the targets[220] reveals **that in 2014 most of the targets were not met, and mid-year reports for 2015 suggest the same** (end of year results for 2015 were not yet available). There are several reasons for this: one is that some indicators are inherently weak ("# of government staff trained" does not distinguish between different depths and lengths of training, so workshop participants and staff undergoing intensive 3 months training are counted the same) and others are hard to measure objectively ("extent cooperation among partners effective"). Secondly, there were weaknesses in the way the data was gathered and entered: for example, there were targets without baselines, baselines that reduced from one year to the next, aggregation of incompatible indicators, changes in indicators from year to year, and confusion between absolute and relative values.

**Finding 94.**   **Reported programme results were well below targets, but the evaluation team could not determine the extent to which this was due to poor performance of the country team or weaknesses of the reporting system itself**

A third reason is overestimation of the expected results in relation to the resources available and in relation to control over the outputs – such that planned results are sometimes more "aspirational" than realistic. A fourth reason for poor performance is simply underfunding. And finally, it is more than likely that there was some actual underperformance.

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[219] Unfortunately, the Technical Working Group does not have significant Government participation although DGMM are listed as a member

[220] Prioritised targets not Comprehensive targets

> **Finding 95.    Despite the consolidating promise of FOCUS, it does not provide reliable or useful real-time performance information at the country level**

The main point the evaluation team wants to make here is not so much about performance of the country programme, as about the weaknesses of the quantitative results reporting framework of UNHCR, which might have the benefit of providing some aggregate results at the global level and the basis for approximate comparison between operations, but does **not provide reliable or useful real-time performance information at the country level.**

> **Finding 96.    UNHCR's results planning and reporting framework is ill-suited to situations where UNHCR's primarily role is policy and advocacy, and the host government takes the lead on registration and service delivery**

There is no doubt that some of the weakness described above are due to the limited menu of indicators available in UNHCR's results planning and reporting framework is ill-suited to situations like Turkey - where the host government is genuinely coordinating the refugee response and providing most of the assistance to refugees,[221] where UNHCR's space for intervention is limited by the Government (i.e. UNHCR does not work in all regions or in all conventional assistance sectors), and where arguably UNHCR's most important contribution is advocacy and strengthening of Government institutions.  In this respect, UNHCR Turkey has been clear in the COP narrative but struggled with the COP results indicators – for example the corporately-required indicator for registration assumes that refugees are primarily registered by UNHCR,[222] indicators for WASH and shelter assume that UNHCR has responsibility for these and do not capture the limited role of UNHCR in providing tents for some camps, and indicators for health and education assume that health and basic education services are provided or at least supported by UNHCR – which is not generally the case in Turkey.[223]

> **Recommendation 27.    When revising the performance indicators, UNHCR globally should develop or adapt indicators to measure the performance of work done by UNHCR to support major host government and partner programmes (e.g. registration, camp management, education)**

## A case for outcome mapping

Outcome mapping is an established methodology for planning and reporting results in situations where the number of actors and actions is so great that direct **attribution of results to investments is hard to determine**, and where the **most important work in the programme is to strengthen the capacity of**

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[221] A similar observation was made by the Report of the Board of Auditors; February 2014; para 16: "We recommend that UNHCR develop corporate KPIs [Key Performance Indicators] for use in operations where third parties lead on delivering the refugee response, to allow country operations to appropriately measure and report on their performance in a supporting role"

[222] As an example of the complexity facing UNHCR at a level not normally visible to outside observers, technically UNHCR does register the non-Syrian refugees but not the Syrians – so the COP indicators need to capture some variation by refugee category or "population planning group".  It is a further complication for UNHCR planning that in 2015 they were encumbered by six population planning groups in Turkey, and needed to disaggregate their activities, reporting and their funding into four main categories: Syrians, non-Syrians except Iraqis, people moving to Europe, and Iraqis. There are reasons for this, but there is also no doubt that this is most inefficient

[223] UNHCR's support for basic education is limited to some school supply kits and transportation support

**intermediary actors** who actually provide the services. Rather than planning and measuring the end results of activities (i.e. the number of SGBV incidents that received an appropriate response – an indicator that in Turkey could only be a wild guess), outcome mapping works to assess the greater capacity and performance of the intermediary institutions (i.e. community centres, MOFSP offices, health centres) that are providing SGBV services. While fully recognising that UNHCR's existing planning and programming machinery is unlikely to change in the foreseeable future, the evaluation team believes that the Turkey situation meets all the criteria where outcome mapping would be a preferred methodology for both planning and reporting, and recommends that UNHCR consider piloting outcome mapping in Turkey if this can be done in a way that does simply overburden the country team – i.e. in a way that it substitutes for the regular programme planning process rather than duplicating it.

## *The need for a Host Country Agreement*

| Finding 97. | The absence of a Host Country Agreement significantly hindered UNHCR's effectiveness and efficiency |
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For many years, all UNHCR Turkey Representatives, as well as visiting High Commissioners, emphasized at the highest levels of the Turkish Government that the absence of a Host Country Agreement prejudiced the programming and procurement activities of UNHCR in support of the Government of Turkey. A Host Country Agreement was signed in mid-2016 and is a most welcome development for which all parties should be warmly congratulated. Until that point, and notably during the period under review, UNHCR was the only major UN agency in Turkey without a Government agreement. Quite apart from the protocol and representational implications of this, and the lack of normal immunities and exemptions for international staff, the absence of a Host Country Agreement directly affected the ability of UNHCR to procure and import essential goods at VAT-exempt prices in a timely way, and limited their control over commodities that were imported through proxy arrangements which left ownership in the hands of partners.

## *Sustainability*

As described in depth throughout this evaluation report, UNHCR has appropriately focused a major part of its efforts on strengthening the capacity of national NGOs and in particular ASAM, as well as helping build up the new Government ministry DGMM with material assistance, technical advice[224] and training. In the past and into the future, **the vast majority of support for the Syrian refugee population is going to be provided by Turkish government departments, local governments, NGOs and communities**. Such a high degree of local ownership suggests good prospects for the sustainability of a favourable protection and assistance environment, but there are still four important measures that UNHCR can take to consolidate sustainability.

Firstly, UNHCR should maintain its focus on the regulatory and enabling environment – moving beyond DGMM and also working more strategically with the Ministry of Labour and Social Security, IşKUR, MOFSP

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[224] The important role of UNHCR in advocating for regulations regarding temporary protection, education and work permits all bear re-emphasizing as they were key enablers for much of the support Syrian refugees have received in Turkey

and MONE –key ministries that are not UNHCR's traditional counterparts.  In addition to this policy and advisory work, the evaluation team felt very strongly **that capacity building of intermediary institutions (government and non-government), including the provision of interpreters and translators, is more efficient and effective in the Turkey context than direct delivery**.  There is still some role for direct delivery, particularly as it provides "entry points" into service areas and communities and establishes UNHCR's credibility with partners, but this role should be much more limited than would normally be seen in "typical" UNHCR operations.[225]

Secondly, UNHCR should **follow through on its Urban Strategy and on the transition to Community-Based Protection** – both of which imply a gradual shifting of resources from case-management to building relationships with local counterparts in order to reach the greatest number of refugees in this vast country.  As part of this transition, community centres should be regarded as a stepping stone to a future where community services are provided by the relevant municipal and national authorities, either through community centres managed and financed by the Government, or through similar community service providers in the Turkish system.

Third, the UN community should **maintain the broader resilience dimension embodied in the transition from RRP6 to the 3RP**, confirm a clear division of labour, and together advocate firmly with donors for increased resources to be allocated to livelihoods and to host communities.

Finally, as argued earlier in the chapter on Social Cohesion, UNHCR needs to work more on the way that Syrian refugees are portrayed and perceived in Turkey.  At a technocratic level, government officials are clearly adapting to the prospects of a protracted stay, and gearing up local authorities and line ministries to include refugees within their regular planning and programming. Academics are also fully aware of the trend towards protracted stay and anticipating social tensions. However, there is the risk of a cognitive disconnect because the way refugees are presented by political figures and by the media to the Turkish public is still characterized by images of temporariness, dependency and charity. In order to pave the way for the Turkish public to get used to Syrians as neighbours not guests, and for them to widely accepted in Turkish society, it will be important for **UNHCR and key messengers to change the narrative regarding Syrian refugees from difference to inclusion, from dependence to economic engagement, and the assistance model from charity to development.**

## Conclusion

Overall, programming was not UNHCR's strength in Turkey during the period under evaluation.  Turkey was a difficult programming environment: in part because of the lack of data, the very large and scattered character of the refugee population, and the limited room for manoeuvre in a situation where Government was firmly in control but itself undergoing rapid institutional changes that resulted in unclear decision-making. UNHCR's ability to be effective in this already difficult programming environment was further hampered by a slow build-up of the programming and supply team, and a range of planning and programming tools (in particular 3RP, COP and the corporate performance framework) that were not well-suited to the Turkey context.  The evaluation team felt that UNHCR had "turned a programming corner"

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[225] UNHCR also needs to work more with AFAD and TRC on readiness for new influxes, because it is vital that a new influx not distract from the long-term agenda and destabilise all that is being achieved with and for the 2.7 million Syrian refugees who are already in Turkey

in 2015 in a number of respects, but that the increased capacity was still only staying a little ahead of the needs, and that the focus should be more on consolidation of programming streams (simplifying procurement by moving to cash, reducing the number of partner agreements, focussing on a few areas of evident priority and comparative advantage, leaving some sectors to other actors) rather than expansion.

# 8 Overall Conclusions

When the evaluation team looked back at the six original evaluation parameters, we drew generally positive conclusions about UNHCR's work in the 2014-2015 period: with some evident areas where UNHCR had broken new ground and found innovative ways to overcome a challenging context, but also occasions where there had been missed opportunities and room for improvement.

**Coordination** of the Turkey operation has been difficult. From the outset, UNHCR correctly invested in its core relationships with the central Government, and broadened its approach to coordinate with local governments (in different ways, and more effectively in Istanbul than in Gaziantep) when it became clear that the bulk of the refugees were going to live outside camps.  Coordination within the UN system has been a mixed experience: the transition from the RRP to the 3RP is leading to better country-level planning, but most stakeholders have doubts about the value-added of trying to link the Turkey chapter of the 3RP to the overall 3RP.  Unfortunately, there is an unresolved divergence of views on overall mandates for coordination between the UN Resident Coordinator and UNHCR, and there are some sectors where agencies still need to finalise a coherent strategy (education, cash) with a clear division of labour (livelihoods, cash).  Now the response is moving from an emergency to a consolidation stage, there is a need to work with Government to review and reset the coordination structures across the board.

With regard to **efficiency**, since relatively few resources flowed through UNHCR compared to the resources provided by the Government and through other UN and non-UN channels, UNHCR has correctly focused its attention upstream on the policy and regulatory environment, and on the capacity of key intermediaries to deliver services more effectively with little or no UNHCR funding.  Investment in Government systems, training and interpreter support has had important multiplier effects, and has generally been more efficient than direct in-kind material assistance (although the argument was clearly made that UNHCR needed to get involved in material assistance in order to gain access to camps and to build a stronger relationship with key Government partners).

Demographic data was a problem in Turkey.  However, anecdotal and partial sources suggest that **coverage** of basic services was exceptional within camps and adequate outside camps (but poor in education), with coverage assured largely thanks to the substantial investment and goodwill of the government and people of Turkey.  The introduction of community centres and (later) the build-up of outreach services from the platform of community centres have been effective at reaching a limited number of urban refugees with quality services.  The move towards an Urban Strategy and Community-Based Protection are designed to further increase coverage.  However, there was and remains a critical gap in analysis, capacity and programming to address two major threats to child protection: the prevalence of child labour and early marriage. The widespread transition to cash is expected to further increase coverage and efficiency, but will rely upon targeting information that is currently not available.

Beginning in late 2014, UNHCR established mechanisms for consulting refugees and was able to better shape its response to refugees expressed needs and priorities. **Appropriateness** of policy and technical assistance to the Government of Turkey was enhanced by the extensive use of senior national staff (in all organisations not just UNHCR), and the provision of Arabic-Turkish interpreters to key Turkish institutions (DGMM, courts, medical facilities) has been instrumental in enabling Syrian refugee access to appropriate services.  With respect to material assistance, the in-kind assistance was mostly considered to be appropriate but winterisation assistance was late, and it is widely believed that cash is more appropriate.

**Impact** is particularly difficult to measure and attribute in refugee situations.  The evaluation team considered impact through the lens of the four main sectors of UNHCR's programme, and concluded that UNHCR's work on the policy and regulatory framework for refugees had helped provide a high level of protection to Syrians (albeit with temporary protection rather than refugee status).  Unfortunately, Syrian refugee children are highly vulnerable to child labour and early marriage, and these two domains of protection need to be addressed as a priority in Turkey in the near future.  The more limited impact of education, community empowerment (including livelihoods) and CRI/cash distribution were largely determined by the limited amount of resources available, although in all three domains the evaluation team felt that impact would have been greater if UNHCR had coordinated better with the key partner and particularly UN agencies. With an increased focus on education, an Urban Strategy that supports refugee relations with local authorities and the transition to cash, the evaluation team is optimistic that impact will increase in the coming year.

The policy and institutional environments in Turkey are conducive to a **sustained level of government support** for Syrian refugees, including eventual absorption of the (unsustainable) community centres into Government social service systems.  Nevertheless, close attention will need to be paid to social and economic forces that could threaten social cohesion between refugees and their host communities.  To increase the prospects of sustainability, and as outlined in its Urban Strategy, UNHCR should step up its engagement with local authorities, and complement this with more investment in analysis and strategic communications aimed at anticipating community friction points.  This should then be followed up with support for Turkish intermediaries to deliver messaging to the Turkish public that advocates for the acceptance of Syrians as long-term neighbours, and sees them as eventual contributors to Turkey's social and economic development.