

Evaluation Service



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

January 2014-June 2015

Executive Summary

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UNHCR Evaluation Service

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Executive Summary

The overall objective of this evaluation is to assess UNHCR's response to the influx of refugees from Syria into Turkey from 1 January 2014 to 30 June 2015. It considers the extent to which pre-determined objectives were met, including reasons for success or failure, it identifies protection and assistance gaps, and which factors in the program design and implementation led to optimal results. Importantly, it does not cover non-Syrian refugees in Turkey, cross-border operations from Turkey into Syria, or onward and transitory movement to Europe.

Led by Universal Management Group, the evaluation took place in Geneva and Turkey from December 2015 to March 2016. The evaluation team interviewed a very wide range of UNHCR officials in all field locations, as well as Turkish national and local authorities, UN agencies, donors, international and national non-governmental organizations, and academics. For reasons explained in the report, the evaluation team only had limited exchanges with Syrian refugees inside and outside camps.

Context

The Turkey context is unique. Turkey is an upper middle income country with significant geopolitical leverage, led by a confident government that initially had a deliberate policy of welcoming Syrian refugees, and that still provides one of the best refugee-hosting legal frameworks in the world. Turkey currently hosts the world's largest refugee population (mostly outside camps and scattered across a vast country), and is also by far the largest contributor to the refugee response in the region. One key aspect of this strong national ownership is Turkish management of Syrian refugee registration. Thus, in accordance with Turkish regulations, demographic details on Syrians in Turkey are not made available to UNHCR or to other agencies. Secondly, it is the Government of

Turkey that decides which partners work where, and UNHCR is only one partner among many. Thus, while UNHCR is the UN's lead organisation responding to this massive refugee influx, it does not control most of the information and resources needed to support this function.

Strategic positioning

Given this context, 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 whenever UNHCR is engaged in a large-scale refugee influx in an advanced economy with a strong government. Most of the established mechanisms of humanitarian coordination, models of assistance, and conventions of donor relations are irrelevant in the Turkey context – and in response UNHCR has needed to configure itself quite differently from the norm. Characteristics of UNHCR's approach in Turkey are: a major emphasis on policy and advocacy for protection over programming; a primary role in supporting government rather than providing direct assistance to refugees; a strong reliance on senior national staff to provide effective liaison with senior government counterparts; and maintaining a low profile – occasionally to the consternation of donors and rights advocates.

From the outset in April 2011, coordination of the Syrian refugee response in Turkey has been firmly managed by the Government of Turkey. Initially the Government declined offers of assistance from UNHCR, so UN agencies and INGOs mainly organized themselves in parallel to the Government. This led to 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, and where the Government primarily coordinates its own substantial programs, involving

some NNGOs and occasionally UNHCR; (b) a UN system that coordinates UN agencies and IOM; and (c) various donor-driven and INGO-driven mechanisms to coordinate between organizations working with a particular donor or in a particular sector.

The RRP6 and subsequent 3RP were the main vehicles for interagency coordination, and the COP was the main vehicle for UNHCR's internal planning and coordination. However, both coordinating mechanisms had deficiencies. In 2014-2015, UNHCR was more effective at coordinating with UN partners than with Government or NGO partners. There is more work needed to improve sectoral coordination of education, cash assistance and livelihoods. Unfortunately, there is no 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.

Over time, UNHCR was able to adjust its priorities and its staffing composition to reflect the rapid and massive increase in the refugee population. It re-engineered from case management/resettlement to strategic engagement/programming, but this took longer than necessary and created the impression among external stakeholders that UNHCR was slow to respond and/or out of touch. Efforts to coordinate and plan an effective programme have been hampered by the policy of the Government not to gather or share key demographic data, although some vulnerability profiling was achieved in the 2014-2015 period while identifying beneficiaries for out-of-camp distributions of cash and core relief items.

Protection

From the outset, protection was UNHCR's top priority in Turkey. Its two key objectives were supporting the Government's revision of the regulatory framework, and supporting the Government's machinery for Syrian refugee registration. By the middle of 2015, 1.8 million Syrian refugees scattered throughout every

province of Turkey were registered at a basic level (at a scale that would not have been achievable or affordable using UNHCR's conventional and more thorough methods), sufficient to allow them levels of protection and access to Government services at levels rarely (if ever) seen in a first asylum country. To a considerable extent, this was enabled by the patient, low-key and flexible support of UNHCR protection staff, and in particular a rather unique policy and advisory team of national officers in the Policy Development Unit.

Access to territory, and UNHCR's ability to monitor it, became more limited as the Government's management of the Syrian border became tighter throughout 2014-2015. Reception services for Syrians are good in camps, but still require monitoring and would especially benefit from access to private office spaces, which would allow UNHCR's visiting field officers to maintain predictable office hours to meet confidentially with refugees. Some 90% of Syrian refugees living outside camps receive administrative services from decentralized offices of the Government ministry responsible for refugees (DGMM) or from the foreigners' police. It is further estimated that less than 15% of the out-of-camp refugee population receives assistance through a network of UNHCR- and donor-supported community centres.

Durable solutions are a long way away for Syrians in Turkey. Small numbers are repatriating voluntarily and UNHCR has carefully and correctly dissociated itself from observing involuntary returns. Resettlement is important as a method of supporting protection space, particularly as a demonstration to the Government of goodwill and burden-sharing. However, it will not significantly reduce the population of Syrians in Turkey, whose birth rate alone is greater than any likely resettlement rate.

Recognising that refugees will be staying for some time in Turkey, in 2015 UNHCR switched its protection strategy from a case management and camp paradigm over to a community-based protection and urban paradigm, which seems to the evaluation team to be the most efficient and

effective approach, and the one most likely to increase coverage and impact.

However, there is one major gap in the entire protection response of the UN (not just UNHCR), stemming in part from reticence to address cultural and traditional factors, and that is insufficient attention to the large and growing risks of SGBV and child exploitation, most often typified by early marriage and child labour. The evaluation team strongly recommends that gathering required data and then addressing these risks through coherent interagency action plans become an immediate protection priority.

Education

The Turkish Government provides unprecedented access for Syrian children to Government schools, but the attendance levels are still very low for many reasons including the Arabic-Turkish language barrier. Furthermore, there is no reliable data on educational achievement. Unfortunately, as a result of different organisational policies and assumptions regarding the likely duration of the Syrian refugee influx, UNICEF and UNHCR initially did not agree on the preferred medium of instruction. This in turn introduced inefficiencies and “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.”¹ While these tensions seem to have been largely resolved in 2015 through an agreed division of labour, as of early 2016 the two agencies have not yet agreed with each other and with the Government on a unified education strategy.

Looking ahead, the evaluation team concluded that the education sector is the single most important priority for significant further programming investment by UNHCR. Education is more than a right in itself; in the Turkey context, it is clear that

education is key to reducing the incidence of early marriage and child labour, to social cohesion, and to sustainable livelihoods, as well as preparing today's youth to eventually return to and participate in the reconstruction of Syria itself. To be efficient in this context, UNHCR first needs to increase its education staff in-country, both in Ankara and in the field offices. Secondly UNHCR should focus upon its agreed operating space within the negotiated 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.

Social Cohesion

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 rapidly and at any time. 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 Turkish nationals for jobs, housing 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, as well as large-scale and visible investment by development actors and INGOs in Turkish communities that are heavily affected by Syrian

¹ Independent Evaluation of UNICEF's response to the Syrian refugee crisis in Turkey 2012-2015, November 2015 P. 44

refugees. The basic elements of this approach, with the important exception of stepping up strategic communications, are already part of UNHCR's Turkey Urban Strategy and of the 3RP.

As many as 400,000 refugees are reportedly working in the informal economy, many in dangerous, precarious and/or poorly paid conditions. With so many Syrian refugees already working, it appears that a priority for UNHCR and its partners should be 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." Key components of such a strategy could be advocacy for refugees to increase their access to the formal labour market *inter alia* by gaining access to formal vocational training, to regularise informal work, and to permit refugees to re-register where they are currently living and working (but without access to social services that are tied to their province of registration).

Programming

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 the Government was in control but itself undergoing rapid institutional changes. 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 FOCUS) that were not well-suited to the Turkey context where the Government is the primary service provider and agencies act in support.

All agencies involved, including the Government of Turkey, have embraced Cash-Based Interventions, but the evaluation team felt there was still a place for targeted in-kind assistance in camps and for response to sudden mass influxes. While coordination of cash distribution between UN agencies and INGOs has improved in late 2015,

there is still little coordination with the substantial Government welfare system. In this complex and crowded environment, it is not clear what UNHCR's comparative advantage is in relation to the many other cash actors. The evaluation team felt that UNHCR had "turned a programming corner" in 2015 in some respects, but that capacity increases consistently lagged behind needs, and that programming focus should be more on consolidation of program streams where UNHCR has a comparative advantage: notably by simplifying procurement by moving to cash, reducing the number of partner agreements, focussing on a few areas of evident priority and comparative advantage, and leaving some sectors to other actors.

Conclusions

Overall, UNHCR has contributed significantly to the protective environment for Syrian refugees in Turkey, particularly by focusing on the legal and institutional framework needed for Syrians to be registered and to access social services.

As the Syrian population continued to rapidly grow and spread across the country, UNHCR was slow to shift from the case management and camp paradigm, but during 2014 and 2015 was adapting - first by building up community centres, and then by ramping up Community-Based Protection grounded in an Urban Strategy.

To consolidate this progress and address some remaining critical gaps, UNHCR needs to increase management emphasis on coordination and on strategic communications, and focus policy and advocacy work specifically on the exceptional vulnerabilities to SGBV, early marriage and child labour experienced by Syrian women and children in Turkey.

Two key elements of tackling these remaining protection gaps and to enhancing social cohesion in the long term are (a) to greatly increase investment in education, and (b) to work at the policy and advocacy level on regularising informal labour, and on allowing Syrian refugees to re-register where they are actually living and working.

List of Findings

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
- Finding 2. There are three distinct communities of coordination in Turkey, each with its own "coordination culture"
- Finding 3. The UN Resident Coordinator and the UNHCR Representative disagree on who should coordinate UN agencies supporting Syrian refugees in Turkey
- Finding 4. UNHCR was more effective at coordinating with UN partners than with Government or NGO partners
- Finding 5. In RRP6, each agency's submission was internally coherent but there was no mechanism obliging agencies to be horizontally coherent
- Finding 6. In 3RP, the quality of coordination is better but resistance to and frustration with coordination is also higher
- Finding 7. UNHCR and UNICEF have improved coordination on education but are not implementing the same strategy
- Finding 8. For cash and e-vouchers, there is no unified coordination mechanism that includes governmental, international and non-governmental organizations
- Finding 9. Despite widespread agreement that it is a priority, livelihoods has problems of coordination, funding and implementation
- Finding 10. Donors are not satisfied with the briefings from UNHCR Turkey
- Finding 11. Coordination was more effective in Istanbul and less effective in Gaziantep
- Finding 12. Coordination within UNHCR Turkey needs improvement
- 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

UNHCR Management arrangement

- Finding 14. The fast-track staffing mechanism worked as intended for Turkey
- Finding 15. National staff are a key success factor for Turkey-based operations
- Finding 16. Some critical positions were left unfilled for too long
- 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
- Finding 18. Frequent and uncoordinated visits from HQs and donors place a heavy load on senior management

The problem of targeting where 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
- Finding 20. UNHCR attempted, but was prohibited from conducting a comprehensive needs assessment
- Finding 21. Distribution of e-vouchers and CRIs provided a pathway to household vulnerability assessment when a direct survey was not possible
- 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
- Finding 23. Some valuable data is not shared, thereby inhibiting effectiveness and efficiency of service delivery
- 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

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
- 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

Registration

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

Access to territory/asylum: reception conditions

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

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

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

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

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

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

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

Finding 36. UNHCR's overall protection approach was appropriate, but too cautious on issues such as early marriage, child labour and domestic violence that are culturally loaded and difficult to tackle

Protection and solutions strategy: durable solutions

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

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

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

Accountability to Affected Populations

Finding 40. UNHCR was slow to start participatory assessments of out of camp populations, but did this effectively from late 2014 onwards

- 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
- Finding 42. The community-based protection approach adopted in 2016 seems an efficient way of increasing protection coverage to remote populations
- Finding 43. UNHCR has enabled the design and delivery of more effective psycho-social services to Syrian refugees
- Finding 44. Refugee feedback mechanisms are weak in Turkey, partly because the operating context discourages open criticism

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
- Finding 46. There is a serious gap in the data regarding early marriage and child labour among Syrian refugees in Turkey
- 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
- 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
- Finding 49. UNHCR staff and partners informed the team that they need more guidance on gender equality in the particularly complex social and economic context of Turkey

SGBV and gender dimensions of the response

- 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
- 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

Education

Education approach in Turkey

- 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

- Finding 53. Turkish language training for employment, and academic Turkish language training for university students, are particularly efficient and effective
- Finding 54. Vocational training is limited and not well connected to the job market
- Finding 55. UNHCR has provided unprecedented support for tertiary education, although not nearly enough to meet the enormous needs

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
- 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 the argument for UNHCR's preferred approach of Turkish medium instruction in national schools will become

Education performance

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

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

Social Cohesion

- Finding 64. UNHCR's partners are less optimistic about the risks of social conflict than UNHCR staff, and feel UNHCR should be proactive in addressing these risks

Strategic communications

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

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

Engaging with local authorities

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

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

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

Refugee community empowerment and representation

Finding 70. UNHCR's community empowerment activities in camps and urban areas embodied the key components of UNHCR's community-based approach, and increased community capacity

Support for host communities

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

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

Community centres

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

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

Livelihoods

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

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

- Finding 77. UNHCR's (and fellow UN agencies') advocacy for labour access was partly successful but is unfinished business
- Finding 78. UNHCR's programming activities to support livelihoods had very limited impact in the evaluation period
- Finding 79. In this context, UNHCR's comparative advantage is on the policy and regulatory side, enabling an environment for refugees to access work, rather more than livelihoods programme delivery

Social Cohesion

3RP vs COP

- 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 a lack of available data
- 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
- Finding 82. UNHCR is seriously underfunded, especially relative to WFP, IOM and UNICEF
- Finding 83. Participating agencies and donors rarely use the 3RP as the basis for planning or resource allocation
- Finding 84. The 3RP is an improvement over the RRP6
- Finding 85. Monthly 3RP dashboards are inefficient (at least in Turkey), and a waste of valuable skilled staff resources across several agencies
- Finding 86. 3RP reporting does not meet donor expectations and needs to be improved

Procurement and contract management

- Finding 87. Many partners felt that UNHCR is spreading itself too thin programmatically and therefore is at risk of overpromising and underdelivering
- Finding 88. UNHCR addressed concerns identified by an OIOS internal audit concerning weak distribution controls during early CRI deliveries
- Finding 89. The late and uncertain arrival of funds made it challenging for UNHCR to make adequate preparations for winterisation assistance
- Finding 90. UNHCR responded well logistically to more classic emergency influxes at Kobane/Suruc and Akçakale

- Finding 91. National NGOs were disproportionately affected by slow negotiation and approval of agreements
- Finding 92. Although cash has become the preferred medium for assistance, there is still a place for in-kind assistance in camps and in response to mass influxes
- 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
- 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
- Finding 95. Despite the consolidating promise of FOCUS, it 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, while the host government takes the lead on registration and service delivery
- Finding 97. The absence of a Host Country Agreement significantly hindered UNHCR's effectiveness and efficiency
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List of Recommendations

Strategic Positioning

Coordination

- 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
- Recommendation 2. UNHCR Turkey should reassess its thematic coordination roles, in particular in education, cash and livelihoods, and be ready to share or step back where other actors have strong capacity and/or mandates to lead
- Recommendation 3. UNHCR globally should increase investment in the professionalization of its coordination function

UNHCR management arrangements

- Recommendation 4. UNHCR Turkey should continue strengthening its HR capacity in order to support the sustained 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

The problem of targeting where is no data

- 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 hard-to-reach populations (which are also likely to be among the most vulnerable) are included
- 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
- 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

Protection

Access to territory/asylum: reception conditions

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

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

Protection and solutions strategy: durable solutions

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

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

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 requires enhanced coordination and substantial investment from Government line ministries, UNHCR, other agencies and INGOs, as well as from the refugees themselves

SGBV and gender dimensions of the response

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

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

Education

Education coordination

Recommendation 15. 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. 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.
- 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

Social Cohesion

Strategic communications

- 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

Engaging with local communities

- 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

Refugee community empowerment and representation

- 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
- 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

- 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)

Planning and Programming

3RP vs COP

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

Recommendation 23. UNHCR Turkey should strengthen its programming efficiency either by investing in more programming capacity, so that 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

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

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

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

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)