

## Review of Compliance, Impact and Monitoring opportunities for the Syria HRP 2017 Protection Risk Assessment August 2017



In 2017, the Whole of Syria protection sector proposed a shift from a “mainstreaming” approach to a strategy that promotes and supports “Do No Harm” programming across the response. As a step to achieve the above, all sectors/clusters were required to carry out sectoral-level Protection Risk Assessments/Analyses (“PRA”) for the 2017 Humanitarian Response Plan (“HRP”). At the project level, all organizations submitting HRP projects were required to demonstrate evidence of how they reflected upon and ensured efforts to Do No Harm. At the mid-way point of 2017, this review was conducted to examine the compliance, impact and monitoring opportunities for the PRAs in the Syria HRP 2017, as well as recommendations for how the PRA and related tools can be improved. The review included a desk review of all relevant documentation including: guidance, 2017 HRP, sectoral PRA matrices, Online Project System (“OPS”) submissions (581 projects). Following the desk review, 42 interviews were carried out with: sector coordinators (hub and WOS across sectors), OCHA leads involved in the HRP, a sample of donors, and a sample of UN agencies, INGOs, and Syrian NGOs which submitted projects on OPS.

With regard to **Compliance**, the review found that 65% of the OPS projects had a PRA (though only 43% had a thoughtfully-completed and constructive PRA), while 35% of all projects had no PRA at all. Sectoral PRAs were completed by all but three sectors. Compliance was mixed across hubs and sectors, and despite the requirement for a PRA as per the humanitarian leadership – no hub or sector was 100% compliant. To improve compliance, the review recommends that the OPS template be revised and have a specific section for PRAs. In addition, the Protection sector will lead a series of trainings on the importance of the PRA and how to do this exercise.

**Impact:** The review concluded that the PRA was a worthwhile exercise and despite some challenges, it did make a difference and have a positive impact on the response. It required and resulted in, for the first time for some, an understanding and consideration of the Do No Harm imperative - which is the responsibility of all sectors and humanitarian actors. The PRA held the sectors and the submitting organisations accountable for addressing this imperative across the board. The review recommends that the PRA should, therefore, continue as a practice in the next HRP. The practice should also be applied (with appropriate adjustments) to other response planning such as the development of localized response plans.

**Monitoring opportunities:** In general, monitoring (any kind of risk) is extremely difficult and is something the PRA step of the HRP never set out to achieve (and for which it did not have the resources). The review notes that monitoring should be done by project implementers and systems supported by the sectors and humanitarian leadership (e.g. through Accountability to Affected Populations (“AAP”) mechanisms).

Despite the achievements, improvements can be made particularly to the process of rolling-out the PRA guidance. Challenges should have been expected considering this was the first time the PRA was rolled out, and it was done relatively late in the planning cycle process. In this respect, the PRA compliance and impact were a success. The review, however, reiterates that the PRA serves as a tool to support the sectors and project implementers do what they must (regardless of the PRA’s existence), that is comply with the Do No Harm imperative. The PRA exercise must not become a “tick-the-box” exercise. It should therefore remain light and flexible, so that it can be adjusted by sectors and actors to meet their needs. It should also be required only if there is no other source of evidence which demonstrates efforts are made by sectors and by all humanitarian actors to Do No Harm.

## TABLE OF CONTENTS

BACKGROUND .....	3
OBJECTIVES AND APPROACH OF THE REVIEW .....	3
<b>1. Compliance</b> .....	<b>4</b>
1.1 Desk Review: Compliance .....	4
1.1.1 Sectoral level compliance .....	4
1.1.2 Project level compliance .....	4
1.2 Interviews of Stakeholders: compliance.....	6
1.2.1 Sectoral PRA: interview findings.....	6
1.2.2 Project PRA: interview findings .....	7
1.2.3 Interviewees' recommendations for improvements.....	7
1.2.4 Review's recommendations on Compliance .....	8
<b>2. Impact:</b> .....	<b>8</b>
2.1 Interviewees' recommendations for improvements.....	9
2.2 Review's general findings and recommendations on PRA impact .....	9
<b>3. Monitoring of the PRAs and risks</b> .....	<b>9</b>
3.1 Interviewees' recommendations for improvements in relation to monitoring .....	10
3.2 Review's findings and recommendations on monitoring.....	10
4. Donor discussions .....	10
5. Summary of the interviews' minority views .....	11
6. Conclusion and summary of key recommendations .....	11
6.1 On compliance: .....	12
6.2 On impact: .....	12
6.3 On monitoring:.....	13
ANNEX 1: List of the Sector leads, Agencies and Donors interviewed for this review.....	14
ANNEX 2: Terms of Reference for the Review.....	15
ANNEX 3: Guidance Issued on Protection Risk Assessment/Analysis for HRP 2017 .....	17

## TABLE OF FIGURES

Figure 1: Overall compliance .....	5
Figure 2: Compliance by sector .....	5
Figure 3: Compliance by hub .....	6
Figure 4: Key constraints for compliance, as per the interviewees.....	7
Figure 5: Interviewees' responses on impact of PRA on sectors/projects.....	8

## BACKGROUND

The humanitarian response inside Syria is one of the largest and most complex in the world. The conflict and access situation, combined with diverse programming modalities – often through remote management and cross-border delivery – result in numerous challenges and risks in carrying out activities. While protection mainstreaming efforts by individual humanitarian partners and organizations and through sectors<sup>1</sup> have been made, there remain gaps and concerns: “Communities are highly reliant on assistance, with a dependency on aid reported in 90 per cent of surveyed sub-districts (...). There are physical safety and security issues at distributions due to targeted attacks, the risk of sexual exploitation, and the potential for inter-communal violence and tensions between IDPs and host communities. The perception that assistance is discriminatory often contributes to these protection issues.”<sup>2</sup>

In 2017, the Whole of Syria (“WOS”) protection sector proposed a shift from a “mainstreaming” approach to a strategy that promotes and supports “Do No Harm” programming across the response, and increases opportunities for a multi-sectoral approach to addressing protection threats and risks experienced by affected communities.

As a step to achieve the above, all sectors were required to carry out *sectoral-level* Protection Risk Assessments/Analyses (“PRA”) for the 2017 Humanitarian Response Plan (“HRP”).<sup>3</sup> At the *project level*, all organizations submitting HRP projects were required to demonstrate evidence of how they reflected upon and ensured efforts to Do No Harm. Each HRP project was required to include a brief paragraph in its narrative highlighting any key protection risks and mitigating measures needed/planned in implementing their specific project.

As requested by the Whole of Syria humanitarian leadership, the PRA was *mandatory* for all actors involved in the HRP/humanitarian response, but also aimed to be *light* in terms of process. At a minimum, it aimed to require all sectors to identify and consider the potential protection risks of their strategy/activities (“what could do harm?”) and how they could mitigate those risks. It also aimed to ensure that all humanitarian actors delivering assistance contributed to their relevant sectoral view(s), and also dedicated time to think through the risks and what could be done to mitigate them for their own individual programmes. While many agencies/actors were already doing this, prior to the PRA there was no requirement, *per se*, and no overarching view or guidance. While acknowledging its limitations (i.e. that the PRA alone would not address the risks), the PRA was a step to resolve this, by outlining a process leading agencies to more systematically ensure a Do No Harm approach.

## OBJECTIVES AND APPROACH OF THE REVIEW

This review examined the compliance, impact and monitoring opportunities for the PRAs in the Syria HRP 2017, and provides recommendations for how the PRA and related tools (e.g. matrix, inclusion in projects through OPS, trainings, guidance, etc.) can be improved. The review was carried out by George Fahmy, a Protection Training Officer and member of the Protection Sector and was done under the oversight of the WOS Protection Sector Coordinators.

The review included a desk review of all relevant documentation (including guidance, HRP 2017, sectoral PRA matrices, OPS project submissions). Following the desk review, 42 interviews were carried out with different sector coordinators (hub and WOS), OCHA leads involved in the HRP, a sample of donors, and a sample of UN agencies, INGOs, and Syrian NGOs which submitted projects on OPS.<sup>4</sup>

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<sup>1</sup> For the purposes of this review, the term “sector” is synonymous with “cluster” (as per the Turkey cross-border hub structure) and “working group” (as per the Jordan cross-border hub structure).

<sup>2</sup> Syria Humanitarian Needs Overview 2017, P. 32.

<sup>3</sup> See PRA Guidance in Annex # 3.

<sup>4</sup> List of sector leads, agencies and donors interviewed are available in Annex # 1.

## 1. Compliance

The below provides findings with regard to compliance, based on a Desk Review (section 1.1) and on Interviews with stakeholders (section 1.2)

### 1.1 Desk Review: Compliance

#### 1.1.1 Sectoral level compliance

All sectors were required to complete a sectoral PRA. This included completion of the PRA matrix/tool as provided in the guidance (see Annex # 2), as well as completing a section in the HRP itself which can be found in every HRP sector chapter under the heading “Protection risk analysis and mitigating measures.” The PRA matrix was supposed to be completed under the lead of sector coordinators and in collaboration with sector members, and prior to project development in OPS; the aim being: 1) individual project PRAs should cascade from the sectoral PRA, and 2) this would serve as a tool for the project submitters and facilitate the PRA process for them.

After reviewing the PRA matrices and the HRP narrative sections submitted by the sectors, the following observations can be made:

With regard to compliance in completing PRA Matrices:

- All sectors were compliant with PRA sectoral matrices except three: Coordination, Emergency Telecommunications, and Logistics
- All the matrices were generally comprehensive and clear with regard to the identified risks related to each sector activities and the corresponding proposed mitigating measures. However, the amount of the details varied from one matrix to another, which is reflected in the length of these documents. For example, while the CCCM and WASH sectors submitted one-page sectoral PRA matrices, the Protection sector submitted a 29-page document.
- It is also worth to mention that two of the lengthy sector matrices (Protection and Shelter/NFI) reflected separately the PRA of each hub of the three. This allowed for contextual specificity (but was lengthy). This was not the case in the rest of other matrices which merged the PRA of the three hubs all together, in some cases resulting in generic and less user-friendly/applicable risks.

With regard to compliance for the **HRP’s PRA text in sector chapters**:

- All sectors included PRA narrative sections in their respective chapters except two: Emergency Telecommunications and Logistics.
- Due to length limitations, none of the PRA narratives of any sector could reflect all the risks/mitigating measures mentioned in the sector matrices. The quality of the narratives, however, did vary from one sector to another. While some HRP chapters attempted to be more complete in terms of providing the reader with identified potential risks and mitigating measures, others seemed more minimalistic and listed even only one potential risk (WASH).
- Another example of the disparity of the quality of these narratives can be found in the Coordination and Education chapters which included sections on protection risks and mitigating measures, but without identifying any of these risks or mitigating measures. The section simply reiterated the importance of analyzing the risks in line with the Do No Harm principle.
- The listing of risks and mitigating measures in the chapter was important to publicly and explicitly state; in a widely-read document such as the HRP this is an opportunity to lay out the potential risks and sectors’ commitment to mitigate them.

#### 1.1.2 Project level compliance

All agencies submitting projects to the HRP were required to include “a brief paragraph in [the project’s] narrative (in the “Activities” box in OPS) highlighting any key protection risks and mitigating measures needed/planned in implementing their specific project.” Compliance was measured both in assessing whether or not this task was done, and whether it was done in a manner which demonstrated it was thought-through. In order to check the compliance rate of including PRAs in the OPS project submissions, and whether or not the PRAs were constructive, all OPS project submissions (581 projects) were reviewed and analyzed.

As a result of this review, three categories of projects were found:

- I. Projects including constructive PRA section: 233 projects (43%)

These projects were thoughtfully completed including clear and constructive PRA sections. They clearly reflect the rationale of a PRA and include logical/doable mitigating measures.

- II. Projects including non-constructive PRA section: 118 Projects (22%)

These projects mentioned PRA or Do No Harm, however, this was done to simply “tick the box” of including this requirement and/or with no clear understanding of the logic of including a PRA. For example by mixing protection mainstreaming with PRA or the principle of accountability of affected population, mixing operational risks with protection risks, or by copying and pasting PRA paragraphs of other submissions from the same agency.

- III. Projects with no mention of PRA or Do No Harm whatsoever: 189 Projects (35%)

Overall compliance - No. of projects (percentage of projects)

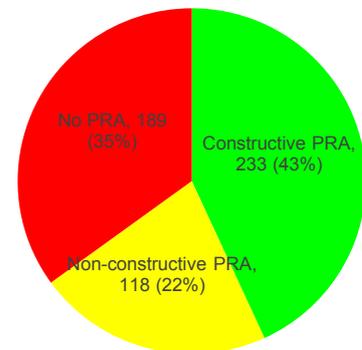


Figure 1: Overall compliance

#### Compliance by sector - No. of projects (percentage of projects)

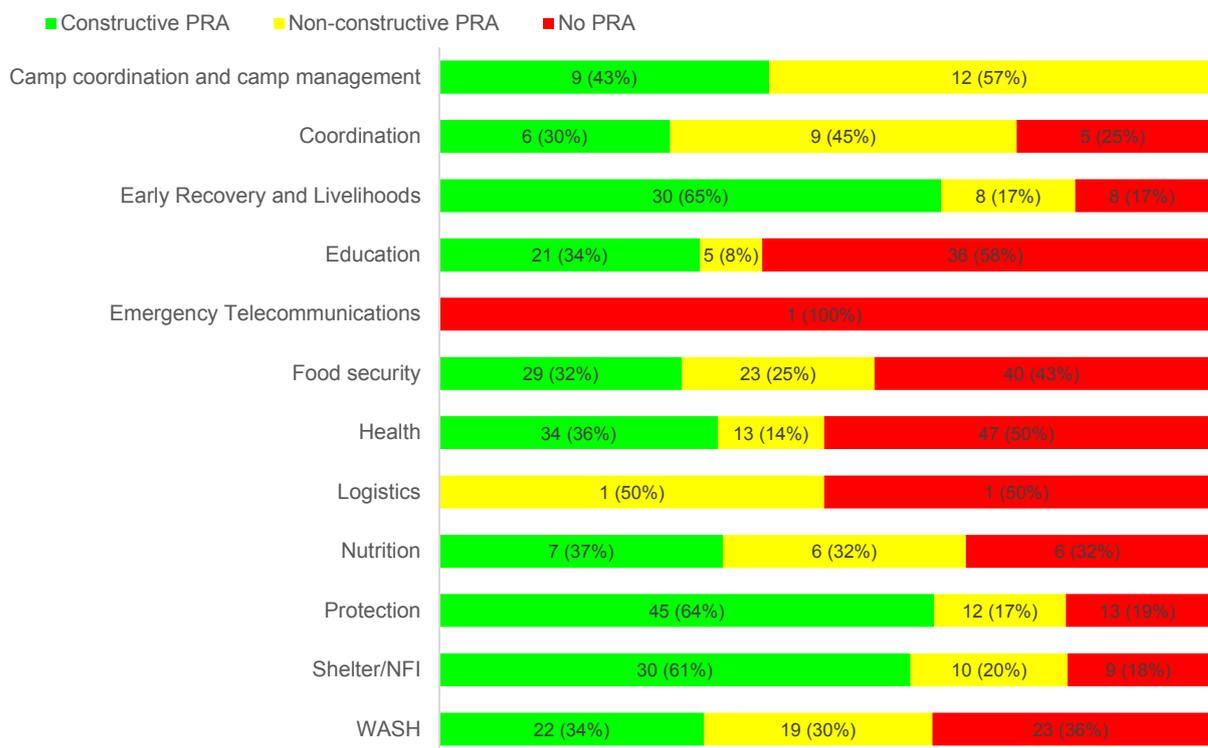


Figure 2: Compliance by sector

### Compliance by "hub" - No. of projects (percentage of projects)

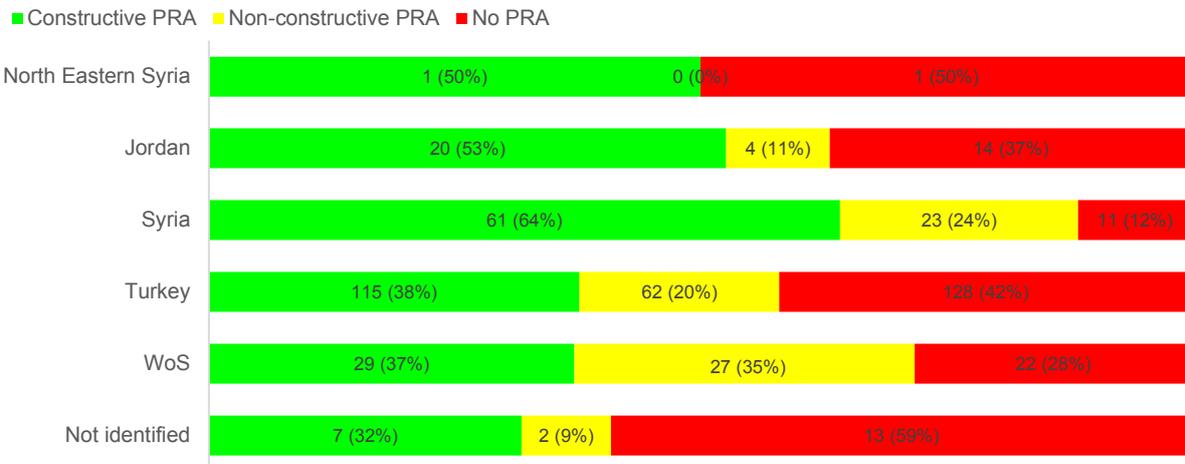


Figure 3: Compliance by hub

In general, compliance was mixed across sectors, as illustrated in the figures above. The Syria hub clearly had the highest compliance rate overall, with a few, specific sectors making up the bulk of the non-compliance. The detailed findings will be communicated to each sector and hub in order to support targeted follow-up and improvements for the HRP 2018. In sum, some hubs/sectors were more compliant than others, but despite the requirement as per the humanitarian leadership – none was 100% compliant.

## 1.2 Interviews of Stakeholders: compliance

Following the desk review of projects and sectoral PRAs, the findings were discussed in 42 interviews with a cross-section of stakeholders. Coordinators and a sample of project submitters were asked the following:

- Was the sectoral analysis done at Whole of Syria or hub level, and what were respective pros/cons?
- How was the project review completed for the PRA? Did coordinators check for compliance and send projects back for review/revision if no (or a poor quality) PRA was included?
- What were the key constraints in doing the PRA? What were the causes and what recommendations are there to improve it (e.g. guidance, training, senior-level messaging, translations, tools such as OPS, etc.)?

The following are summaries of the views and recommendations expressed during the interviews on the compliance:

### 1.2.1 Sectoral PRA: interview findings

- The majority of the sector leads expressed their satisfaction with the matrices they submitted. The majority also stated that the matrices were done collectively with their partner organizations and before the project drafting stage.
- However, since it is the first time to do this exercise, some sector coordinators did not have enough time to present the PRA rationale to all partners. It was hard sometimes to do proper consultations or collect inputs from all agencies on the hub level. In some cases, the coordinators did the entire PRA, especially on the WOS level. Some organizations were boycotting WOS (this particularly is reported to have affected the Health sector in Turkey hub) and they did not share with partners their inputs to the matrix. Some stated it was unclear if the matrices should include all potential risks or just the major ones.
- For the coordination and logistics sectors, there are no standard activities and therefore it was hard to come up with measurable protection risks and corresponding mitigating measures.

### 1.2.2 *Project PRA: interview findings*

Despite the humanitarian leadership's instruction that inclusion of PRA in projects was mandatory, there was a relatively weak compliance rate with only 65% of sector-approved projects completing PRAs (including constructive and non-constructive PRAs) and 35% of projects having no mention whatsoever of PRAs. The interviews revealed that the main reasons for non-compliance were:



Figure 4: Key constraints for compliance, as per the interviewees

- Concept was not clear and “confusing” (many equated their confusion with the PRA to similar confusion with long-standing elements in the HRP such as gender marker, environment, and Accountability to Affected Populations).
- Many project proposals mixed PRA with operational risks.
- Lack of knowledge/proper training sessions on the rationale and how to do PRA.
- No dedicated section in the OPS for PRA led to the PRA being written in different parts of the OPS project template: sometimes in the objectives, or in the activities and outputs, or even in the indicators and targets sections.
- Many sector leads did not have time to provide constructive feedback about PRA during the projects reviews. Some coordinators stated their focus was mainly on the technical parts of the projects, and they therefore might have approved a large number of projects without any mention of PRA. On the other hand, many other coordinators made clear that any project without a PRA was not be approved. However, due to time constraints and interest of ensuring a project was approved in time for the HRP timeline, approval in many cases was based on simply ensuring the mention of a PRA and not on the quality of the text.
- Some sector leads were not enthusiastic about the PRA requirement since they were not convinced of the effectiveness of the process.
- Some project submitters found some of the content of the PRA matrices generic. Sectoral matrices done at WOS level and even some done at hub level, but which were overly generalized, did not capture the particularities of risks in different locations/contexts in Syria. Some of the mentioned risks were operational/implementation risks rather protection risks/harming the beneficiaries/humanitarians.

### 1.2.3 *Interviewees' recommendations for improvements*

Recommendations for improvements from the interviewees' include the following:

- Provide interactive trainings to sector member agencies on how to do PRA. Trainings should not be conducted during the busy time of the HRP preparations/deadlines. Trainings should be conducted by protection specialists in both English & Arabic and should be close to the reality of the humanitarian workers in Syria, not based on generic concepts. Trainings should include good and weak samples of PRA analysis as a guidance document. Training workshops should be short (half or one day) and explain in detail the differences between Do No Harm, protection mainstreaming and a PRA. An online training module on PRA can be considered including real scenarios from the context.
- PRA cannot be cost neutral. Cost and resources are essential to do PRA properly. Protection coordinators should advise /offer technical support to all sectors and agencies in the drafting of the PRA and provide constructive feedback.
- It should be clear to the organizations that whatever is mentioned as protection risks in their project proposals shall not affect the acceptance or the rejection of their projects. In this regard, it has been suggested to change the last column of the matrix “Acceptable Level of Risks” to “Negative Impacts if Mitigating Measures Are Not in Place.”



- Some criteria should be established to assess the protection part of every project, maybe a marking system like the gender marker, and to be done by a protection specialist.
- One narrative box in the OPS to be dedicated for PRA. Segregation between risks and mitigating measures in the OPS dropdown menu help to avoid generic paragraphs.

#### 1.2.4 Review's recommendations on Compliance

The PRA compliance was mixed, with some sectors stronger than others, and some hubs stronger than others. This applies to both sectoral-level and project-level compliance.

The following are the recommendations of the review vis-à-vis compliance:

1. The OPS template is to be revised to have particular sections for PRAs. One for protection risks and another for the proposed mitigating measures.
2. Trainings on the importance of the PRA and how to do it should be offered as part of the HRP guidance. The trainings should be short (half-day) and be delivered at the three hubs of the Syria response. Attendance shall be open to all partners of the different sectors. It would be better to conduct these workshops in September ahead of the busy deadlines of the HRP process.
3. The new PRA Guidance document shall include good and weak samples of PRAs. It should be distributed in both English and Arabic. The Guidance shall include an Annex with the timeline of the PRA workshops in the different hubs.
4. As was the case for the 2017 HRP/PRA, the Protection sector should offer its support to other sectors, but it is the responsibility for each sector to ensure the PRA compliance and to proactively reach-out to the Protection sector for support at hub and/or WOS levels.
5. Sectoral level PRAs should avoid generic/generalized analyses. The PRAs should be done at hub level and with a sufficient level of contextual specificity so they can be easily applied and understood by operational actors in each hub.

## 2. Impact:

The below provides findings with regard to the impact of the PRA, based on Interviews with stakeholders.

Coordinators and agencies were asked if the PRA had any impact/changed the way sectoral plans and projects were thought-through, developed, submitted, and implemented. The interviews also discussed if the inclusion of the PRA led to a change, and if there was no PRA, would the sectors and/or the humanitarian actors submitting projects have done a PRA or considered Do No Harm?

The following are summaries of the views expressed by the interviewees with regard to the PRA impact:

- To a large extent, the PRA requirement made partners (especially the newly established NGOs) think about potential protection risks and integrate mitigating measures. It acted as an "eye-opener" for many.
- Some of the agencies even changed some project activities that may entail potential protection risks for the beneficiaries, and some others identified mitigating measures that they would not have thought about if the PRA exercise had not been done.
- On the other hand, the PRA requirement was seen by some as a "tick the box" process, as they felt this exercise would be difficult to convert into real actions on the ground.

Did the PRA have any positive impact/ change on sectors/projects?

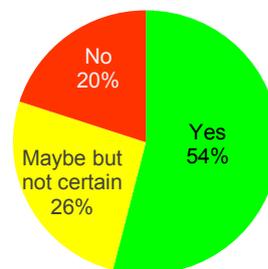


Figure 5: Interviewees' responses on impact of PRA on sectors/projects

- Some noted that projects usually consider Do No Harm. They stated that projects in the OPS are concept notes. If donors approve the concepts, they will ask for proper proposals which normally include Do No Harm.
- With no efficient follow-up, reviewing and monitoring, PRA could be just another routine task of the HRP.

## 2.1 Interviewees' recommendations for improvements

- The PRA matrix, as well as the PRA sections in all projects should be assessed at the mid-year review. This review process should be supported by the respective sector coordinators, and if asked by the sectors - protection specialists on the ground should be available to explain, help, assess and guide the implementers of the projects, not only the drafters, all year long.
- To keep the discussion alive about the importance of PRA and to catch up with the fast changing protection risks in different hubs, PRA should be included and discussed in each individual sector meetings' agenda at least twice a year.
- SSG should encourage donors who do not already do so to integrate PRA and DNH as a requirement for funding requests (i.e. proposals submitted to donors directly). They may also include PRA in the projects' indicators as well as in the monitoring and evaluation process. Therefore, the PRA matrix should be forwarded to donors and they should use it or something like it to a similar end.
- "Protection analysis" data should be available to donors and agencies on the ground.
- Protection analysis should be part of briefings and conflict overviews during regular meetings at all levels (e.g. WOS/Hub, technical and HCT). The provision of protection analysis to coordinators and members should support the humanitarian actors to better measure (and adjust if necessary) their PRA and related impact. For example, protection monitoring reports should be shared with all actors regularly.
- Do No Harm should be promoted among all actors not only projects planners but also the local authorities. The latter's capacity should be strengthened by their engagement in the PRA orientation/training of the next HRP, as well as in the participation to regular induction sessions about protection.
- PRAs should be required elements not only for the HRP, but also for other interventions such as micro-plans, sectoral and inter-sectoral response plans, and so on.

## 2.2 Review's general findings and recommendations on PRA impact

The PRA step in the HRP did have a positive impact. Most Projects had PRAs, and through the consideration of these PRAs, projects were adjusted if a mitigating measure could not be identified and/or an unacceptable level of risk was found. However, there remains room for improvement.

The overarching recommendation of the review is therefore that the PRA should be integrated into the HRP 2018 (and any related documents going forward). In addition, the specific recommendations of interviewees, as listed above in section 2.1, are also endorsed. This is with the acknowledgement that the responsibility for completing the PRAs and ensuring compliance at sectoral and project level rests with the respective sector coordinators. While the Protection sector should be available to provide support, understanding and completing the PRA must be part of the core functions of the coordinator of any sector.

## 3. Monitoring of the PRAs and risks

The PRA of the Syria HRP 2017 did not aim (and never had the means/resources) to monitor and assess if the PRAs were adhered to. The challenges for simple project monitoring in the Syria context are extremely complex, and PRA monitoring would be even more so. As part of this review, however, coordinators and project submitters were asked whether protection risks (which were highlighted in the PRAs) have arisen. How were they dealt with? Have the mitigating measures and any monitoring



systems been put in practice (e.g. AAP mechanisms<sup>5</sup>) and if so with what results? If not, are these monitoring systems something we should try to put in place, would we be able to respond if so and are there risks associated with doing so?

In response, the interviewees almost all stated that there is no mechanism on the sectors' level to review or monitor the protection risks or the mitigating measures which were highlighted in each sector's matrix. Some agencies have complaints mechanisms/feedback boxes at distribution sites. Some organizations also monitor through regular meetings with programme officers and reviewing reports. In addition, some have community-based complaints mechanisms. In general, monitoring (not only of protection risks and mitigation, but in general) remains one of the hardest activities to do effectively and efficiently in the context of Syria – where remote management and/or access challenges are the norm.

### 3.1 Interviewees' recommendations for improvements in relation to monitoring

- There are some operational monitoring mechanisms in place, such as: Post Distribution Monitoring (PDM) or the Periodic Monitoring review (PMR) which can include some protection considerations in the next round. Protection specialists should advise on how to include protection into the existing monitoring mechanisms.
- PRAs should be integrated in projects and with dedicated indicators.
- Monitoring needs to be downstream with project owners; it would be good to build the capacity of the project owners to monitor/provide them with tools. More resources are needed to do monitoring and evaluation.
- Third party monitoring would be great, not to solely identify mistakes but to monitor also risks and check if mitigating measures are in place.

### 3.2 Review's findings and recommendations on monitoring

The PRA monitoring is something the PRA never set out to do. The review's position is this should be done by project implementers and systems supported by the sectors. Nevertheless, the review does recommend that:

- Sectors consider integrating questions and risks related to their respective PRAs into their existing monitoring mechanisms, e.g. PDM.
- In a review of the AAP-related mechanisms, overseen and championed by the humanitarian leadership, they should also cross-reference the PRA matrices to determine to what degree AAP mechanisms are and are not looking at issues raised in the PRA.
- Continue to promote the strengthening of local partner capacity to carry out meaningful monitoring.

## 4. Donor discussions

The below is a summary of discussions with two donors, noting that requests for donor interviews for this review were made to six major donors. The discussions linked to their views on the PRA, whether or not a PRA-like mechanism already is required by them, and their recommendations in taking the PRA forward.

- Donors usually have their own humanitarian protection policy with an emphasis on protection risks, and they use different terms like protection risks, centrality of protection, and protection mainstreaming to reflect their commitment to the Do No Harm Principle.
- Those interviewed were very supportive of the PRA process which they believe was quite consultative and they see the matrix as an achievement and good tool on the sector level. Protection sector should continue these efforts of support to other sectors in this regard.
- In their view, the PRA reflects good programming practice. On the other hand, it is very hard to monitor this process. In order to convince partners to use PRA, they have to see the positive

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<sup>5</sup>[https://interagencystandingcommittee.org/system/files/legacy\\_files/TOOLS%20to%20assist%20in%20implementing%20the%20IASC%20AAP%20Commitments.pdf](https://interagencystandingcommittee.org/system/files/legacy_files/TOOLS%20to%20assist%20in%20implementing%20the%20IASC%20AAP%20Commitments.pdf)

impact of the process. The impact of the PRA process could be better established by talking to sample of beneficiaries in different locations.

- Training on PRA would be crucial for the implementation of the process, especially if it is contextualized per each hub.
- While the donors interviewed encourage the projects they are funding to be part of the HRP or “the coordination bodies in general,” they also can fund projects outside the HRP.

## 5. Summary of the interviews’ minority views

The following are views expressed by a small number of the participants, which the review feels helpful to share and/or obliged in the spirit of transparency. These were recommendations/views which were not adopted as part of the main findings due to the small number of persons expressing this, and/or the impracticability of applying these to the PRA for the HRP. Some are, nevertheless, helpful ideas to apply in the future and/or beyond this review.

- PRA should not be mandatory. “Agencies should be convinced of including a PRA otherwise it would be useless.” “It was the understanding at the HRP workshop that PRA will not be another burden.”
- Protection analysis should be deepened in each sector strategy, possibly in the form of dedicating a chapter on comprehensive protection strategy. Such a chapter shall include up-to-date protection analysis and surveys, for example on vulnerable groups in a specific geographical area. It should not be only protection and human rights driven but also evidence based. This analysis should be translated into clear indicators in quantitative and qualitative manners. This specification of targets is itself a protection strategy. Projects submitted under the sector framework should clearly indicate which of these specific targets have been taken on by those particular projects. That would be more practical than an addition of PRA.
- Application of a protection marker guided by the framework that the sector developed. But questions remain, who does the marker: 1) self-assessment, 2) the sector (peer review from other partners in the sector), or 3) a third party?

## 6. Conclusion and summary of key recommendations

The review concludes that the PRA was a worthwhile exercise and despite some challenges, it did make a positive difference in the response. The Do No Harm imperative is the responsibility of all sectors and humanitarian actors, and the PRA is a tool which facilitates addressing this imperative across the board.

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**The PRA should, therefore, continue as a practice in the next HRP. The practice should also be applied (with appropriate adjustments) to other response efforts such as the development of inter-sector response plans.**

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Despite the achievements, improvements can be made particularly to the process of rolling-out the PRA guidance. Challenges should have been expected considering this was the first time the PRA was rolled out, and it was done relatively late in the planning cycle process. In this respect, the PRA compliance and impact were a success. **With the adjustments to the process as detailed in the recommendations below, the process should be smoother and more compliant and impactful.**

The Review, however, reiterates that the PRA serves as a tool to support the sectors and project implementers do what they must (regardless of the PRA’s existence), that is comply with the Do No Harm imperative. The Protection Sector can remain guardians of guidance and advice, but it is not the sector’s responsibility to ensure a PRA. The PRA exercise must not become a “tick-the-box” exercise. It should therefore remain light and flexible, so that it can be adjusted by sectors and actors to meet their needs. It should also be required only if there is no other source of evidence which demonstrates efforts are made by sectors and by all humanitarian actors to Do No Harm.

For ease of reference, the Review's recommendations are repeated below:

### 6.1 On compliance:

1. *The OPS template is to be revised to have particular sections for PRAs. One for protection risks and another for the proposed mitigating measures.*
2. *Trainings on the importance of the PRA and how to do it should be offered as part of the HRP guidance. The trainings should be short (half-day) and be delivered at the three hubs of the Syria response. Attendance shall be open to all partners of the different sectors. It would be better to conduct these workshops in September ahead of the busy deadlines of the HRP process.*
3. *The new PRA Guidance document shall include good and weak samples of PRAs. It should be distributed in both English and Arabic. The Guidance shall include an Annex with the timeline of the PRA workshops in the different hubs.*
4. *As was the case for the 2017 HRP/PRA, the Protection sector should offer its support to other sectors, but it is the responsibility for each sector to ensure the PRA compliance and to proactively reach-out to the Protection sector for support at hub and/or WOS levels.*
5. *Sectoral level PRAs should avoid generic/generalized analyses. The PRAs should be done at hub level and with a sufficient level of contextual specificity so they can be easily applied and understood by operational actors in each hub.*

### 6.2 On impact:

1. *The overarching recommendation is that the PRA should be integrated into the HRP 2018 (and any related documents going forward).*
2. *The PRA matrix, as well as the PRA sections in all projects should be assessed at the mid-year review. This review process should be supported by the respective sector coordinators, and if asked by the sectors - protection specialists on the ground should be available to explain, help, assess and guide the implementers of the projects not only the drafters all year long.*
3. *To keep the discussion alive about the importance of PRA and to catch up with the fast changing protection risks in different hubs, PRA should be included and discussed in each individual sector meetings' agenda at least twice a year.*
4. *SSG should encourage donors who do not already do so, to integrate PRA and DNH as a requirement for funding requests (i.e. proposals submitted to donors directly). They may also include PRA in the projects indicators as well as in the monitoring and evaluation process. Therefore, the PRA matrix should be forwarded to donors and they should use it or something like it to a similar end.*
5. *"Protection analysis" data should be available to donors and agencies on the ground.*
6. *Protection analysis should be part of briefings and conflict overviews during regular meetings at all levels (e.g. WOS/Hub, technical and HCT). The provision of protection analysis to coordinators and members should support the humanitarian actors to better measure (and adjust if necessary) their PRA and related impact. For example, protection monitoring reports should be shared with all actors regularly.*
7. *Do No Harm should be promoted among all actors not only projects planners but also the local authorities. The latter's capacity should be strengthened by their engagement in the PRA orientation/training of the next HRP, as well as in the participation to regular induction sessions about protection.*
8. *PRAs should be required elements not only for the HRP, but also for other interventions such as micro-plans, sectoral and inter-sectoral response plans, and so on.*

### 6.3 On monitoring:

1. Sectors consider integrating questions and risks related to their respective PRAs into their existing monitoring mechanisms, e.g. PDM.
2. In a review of the AAP-related mechanisms, overseen and championed by the humanitarian leadership, they should also cross-reference the PRA matrices to determine to what degree AAP mechanisms are and are not looking at issues raised in the PRA.
3. Continue to promote the strengthening of local partner capacity to carry out meaningful monitoring.

## ANNEX 1: List of the Sector leads, Agencies and Donors interviewed for this review

Whole of Syria	Syria Hub	Turkey Hub	Jordan Hub
1-Coordination 2-Early Recovery & Livelihood 3-Education 4-Food Security & Agriculture 5-Health 6-Protection 7-Shelter/NFI 8-WASH	9-Early Recovery & Livelihood 10-Education 11-Food Security & Agriculture 12-Logistics 13-NFI 14-Protection 15-Protection GBV	16-CCCM 17-Coordination 18-Early Recovery & Livelihood 19-Education 20-Health 21-Logistics 22-Shelter/NFI 23-WASH	24-Education 25-Food Security & Agriculture 26-Protection 27-Shelter/NFI

UN Organizations	Donors	NGOs
28-IOM 29-UNDP 30-UNRWA 31-WFP 32-WHO 33-UNHCR	34-European Commission 35-USAID	*Names of national and international NGOs interviewed are anonymized. A number of the sector coordinators also include NGOs

## ANNEX 2: Terms of Reference for the Review

Review of Compliance, Impact and Monitoring opportunities for the Syria HRP 2017 Protection Risk Assessment

### Background:

The humanitarian response inside Syria is one of the largest and most complex in the world. The conflict and access situation, combined with diverse programming – often through remote management and cross-border delivery – result in numerous challenges and risks in carrying out activities. While protection mainstreaming efforts by individual actors and through clusters have been made, there remain gaps and concerns: “Communities are highly reliant on assistance, with a dependency on aid reported in 90 per cent of surveyed sub-districts. There are physical safety and security issues at distributions due to targeted attacks, the risk of sexual exploitation, and the potential for inter-communal violence and tensions between IDPs and host communities. The perception that assistance is discriminatory often contributes to these protection issues.”

In 2017, the Whole of Syria protection sector proposed a shift from a “mainstreaming” approach to a strategy that promotes and supports “do no harm” programming across the response, and increases opportunities for a multi-sectoral approach to addressing protection threats and risks experienced by affected communities.

As a step to achieve the above, all sectors/clusters were required to carry out sectoral-level Protection Risk Assessments/Analyses (“PRA”) for the 2017 HRP. At the project level, all organizations submitting HRP projects were required to demonstrate evidence of how they reflected upon and ensured efforts to Do-No-Harm. Each HRP project was required to include a brief paragraph in its narrative highlighting any key protection risks and mitigating measures needed/planned in implementing their specific project.

The PRA aimed to be *mandatory* for all actors involved in the HRP/humanitarian response, but also *light* in terms of process. At a minimum, it aimed to require all sectors to have a collective view on the potential protection risks of their strategy/activities (“what could do harm?”) and how they could mitigate those risks. It also aimed to ensure that all humanitarian actors delivering assistance had a part of this sectoral view, and also dedicated time to think through in their own programming – what are the risks and would could we do to mitigate them. While many agencies/actors were already doing this, there was no requirement, *per se*, and no overarching view or guidance. The PRA was a step to resolve this, while acknowledging its limitations, i.e. that the PRA alone would not address the risks, but the process of doing it could lead to agencies more responsibly ensuring a do no harm approach..

### Objectives of the review:

The review should provide the following:

- **Compliance:** All sectors and HRP submissions were required to complete PRAs. The review should provide the compliance rates, per sector. It should also analyse the content as to whether or not the PRAs completed were thoughtfully done (in terms of process and consultations amongst coordinators/hubs and most importantly amongst actors. This includes whether analysis was done at WOS or hub level, and respective pros/cons). Did coordinators, in their project review, check for compliance and send projects back for review/revision if no (or a poor quality) PRA was included? If there were faults or gaps, what were the causes and what recommendations are there to improve it (ranging from guidance, training, senior-level messaging, translations, tools such as OPS, etc.)
- **Impact:** Did this have any impact/change on the way sectoral plans and projects were thought through, developed, submitted, and implemented? Did the inclusion of the PRA lead to a change? If there was no PRA, would the sectors and/or the humanitarian actors submitting projects have done a PRA or considered DNH? If yes, how?
- **Monitoring:** While we do not have the resources to comprehensively assess if the PRAs (in sectors and projects) were adhered to; we can anecdotally survey (through interviews) whether protection risks (which were highlighted in the PRAs) have arisen. How were they dealt with? Have the mitigating measures and any monitoring systems been put in practice (e.g. AAP



mechanisms2) and if so with what results? If not, are these monitoring systems something we should try to put in place, would we be able to respond if so and are there risks associated?

**Deliverable:**

As a result of this review, a report will be delivered detailing findings on the three key areas, as well as recommendations for how the PRA and related tools (e.g. matrix, inclusion in projects through OPS, trainings, guidance, etc.) can be improved.

**Approach/Required elements:**

The review lead will have to:

- a. Review all relevant documentation (including guidance, HRP, sectoral PRA matrices, OPS project submissions)
- b. Prepare interview questions and lists, and carry out interviews with:
  - i. A representative sample of different sector coordinators (hub and WOS)
  - ii. OCHA leads involved in the HRP
  - iii. A representative sample of UN agencies, INGOs, and Syrian NGOs which submitted projects on OPS.
  - iv. Select group of donors.
- c. Travel to all hubs for the above meetings.
- d. Prepare draft report for review and consideration by sector leads at WOS and hub levels as well as OCHA.

**Timeline:**

The review must be ready in sufficient time for recommendations to be incorporated into the HPC 2018 process (e.g. updates to OPS, inclusion in guidance, etc.). This deadline is being confirmed with OCHA Geneva, but a first draft of the report should be available by 31 May. The final report by 15 June.

**Reporting line:**

The review will be done under the supervision of the Whole of Syria Protection Cluster coordinator, and with close consultation with OCHA and select volunteers from amongst other clusters and hubs.

## ANNEX 3: Guidance Issued on Protection Risk Assessment/Analysis for HRP 2017

*“We are aware that attempts to provide humanitarian assistance may sometimes have unintended adverse effects. In collaboration with affected communities and authorities, we aim to minimise any negative effects of humanitarian action on the local community or on the environment. With respect to armed conflict, we recognise that the way in which humanitarian assistance is provided may potentially render civilians more vulnerable to attack, or may on occasion bring unintended advantage to one or more of the parties to the conflict. We are committed to minimising any such adverse effects...” –The Humanitarian Charter (Sphere Handbook)*

This note provides guidance to all sectors/clusters to carry out (sectoral-level) and support (project-level) Protection Risk<sup>6</sup> Assessments/Analyses for the 2017 HRP as agreed during the HPC workshop in September 2016. To recall those discussions, making best efforts to avoid doing harm is an **Imperative**. It is each individual sectors’ (and in turn sector members’) **Responsibility** to make every effort to address this imperative. The protection risk analysis is a tool to support sectors and members in fulfilling their responsibility and provides an **Evidence** base that we have made efforts to not do harm.

### Expected deliverables:

1. **Sectoral level:** Each sector will ensure a Do No Harm and Protection Risk Analysis as part of its Sectoral Strategy development. Each sector should, at minimum:
  - a. Identify potential protection risks that may arise from the implementation of your sector strategy (**at HRP activity level**).
  - b. Detail mitigating measures for these risks.
  - c. Identify existing/required resources for mitigating and monitoring these risks in 2017.

**\*\*DELIVERABLE 1a:** Hub-level sectoral protection risk analysis matrix completed (by hubs with cluster members) by or before **16 October** and shared with respective WOS Sector Coordinators and cluster members.

**\*\*DELIVERABLE 1b:** WOS Sector Coordinators submit consolidated (from all hubs) protection risk analysis matrix and relevant paragraph (to be inserted into the HRP sector chapter) to OCHA and to WOS Protection (hepps@unhcr.org) by or before **28 October**.

2. **Project level:** Organisations submitting HRP projects must demonstrate evidence of how they reflected upon and ensured efforts to Do-No-Harm. Each project will be required to include a brief paragraph in its narrative (in the “Activities” box in OPS) highlighting any key protection risks and mitigating measures needed/planned in implementing their specific project.

**\*\*DELIVERABLE 2:** All projects uploaded to OPS include paragraph related to protection risks and mitigating measures in relation to the specific project submission.

### Process (in chronological order):

1. This guidance is circulated to and read by all hub-level cluster/sector coordinators and members (**timing: ASAP**).
2. Hub-level: **Protection coordinators** present the concept for Protection Risk Analysis at the inter-sector/inter-cluster meetings (**timing: first week of October**), answering all process and substantive questions so cluster/sector coordinators are able to roll this out within their hubs/sectors. This should require a maximum one hour agenda item at hub inter-cluster/sector meeting.
3. **Sector/Cluster coordinators, with members**, facilitate hub-level Protection Risk Analysis (at Activity Level) for their Sector Response Plan. This would likely be done during a hub-level sectoral meeting<sup>7</sup> using the tool provided by WOS Protection Sector. (**Timing: as soon as sector plan “Activities” are agreed, no later than 16 October**). The purpose of this process is: a) to ensure each sector plan at hub level (i.e. as close to operations as possible) has

<sup>6</sup> This analysis is concerned with risks that have a direct impact on the person in need. While relevant to the response generally, this analysis is not concerned with compliance/financial-related (e.g. procurement) risks.

<sup>7</sup> If the sector is doing WOS-wide meetings on the sector plans it can be done during these meetings, however, it is essential the meeting is attended by cluster members (i.e. implementing agencies) and not just coordinators.

considered the Do-No-Harm principle and protection risks and adjusted as necessary, and; b) to demonstrate the concept to members (i.e. implementers) so they understand it and can do a similar (albeit lighter and more specific) analysis for their individual projects. Depending on the complexity of the sector plan and number of partners, a 1-3 hour session with partners is required (i.e. it is expected each cluster/sector will organise its own meeting in the context of rolling-out HRP guidance, and this can be a stand-alone session or one of the agenda items). Depending on timing and availability, Protection sector colleagues can attend at a sector's/cluster's request.

4. Results of number 3 (i.e. completed sectoral-level protection risk analysis table) should be shared by **hub sector coordinators** with members and with their WOS coordinators **(timing: no later than 16 October)**.
5. **Sector/Cluster members submitting HRP projects** should ensure the essential protection risk questions are considered and include a relevant paragraph in project submissions (as per this guidance). **(Timing: in line with OPS project submission deadlines)**.
6. **WOS Sector Coordinators** consolidate hub-level analyses and submit to OCHA and WOS Protection (hepps@unhcr.org). **(Timing: no later than 28 October)**.
7. **WOS Sector Coordinators** complete paragraphs related to Protection Risk Analysis (to be inserted in HRP sector plan chapters) and submit to OCHA and WOS Protection (hepps@unhcr.org). **(Timing: no later than 28 October)**.
8. **All Coordinators**, during project review, should ensure the relevant text is included and coherently presented in each project submission. **(Timing: in line with project review deadlines)**.
9. Following HRP completion, **Protection sector** will consult other coordinators to take stock of this effort, including its content, impact, and any follow-up necessary. **(Timing: after HRP process)**.

### Substance – The Analysis:

The recommended tool for the **sectoral level analysis** is the below table (including guiding questions and an example).

Activity	Protection Risk/Threat	Likelihood	Impact	Mitigating Measure	Monitoring	Resources Required	Acceptable Level of Risk
List the "Activity" in your Sector Response Plan.	What are the key Protection risks beneficiaries or humanitarians may be exposed to through this activity's implementation?	What is the likelihood of this risk actually occurring?	What would be the level of impact on beneficiaries and/or humanitarian workers?	What are ways we could reduce the risk or weaken its impact?	How can we monitor for this risk?	What resources, if any, would be required to mitigate and/or monitor the risk?	Is this an acceptable level of risk? Do we go forward with the activity?
<b>Example</b> Provision of NFI packages.	Increased risk of inter-community tension due to varied assistance packages across members	High	High	1. Agree to minimum assistance package across sector. 2. Assess and validate any changes before they occur. 3. Identify and exclude from variance any items particularly prone to create tensions.	1. Include item variance monitoring in M&E. 2. Monitor for correlation between assistance varying packages and inter-community tensions.	1. Human resources to analyse data on assistance variation(s). 2. Protection sector assistance during the analysis.	Yes/No

Prior to carrying out the analysis at sector level, it is recommended that sector coordinators also review the (two page) Sphere Project Guidance on this exercise. These two pages alone, along with your knowledge of the operational and sectoral context, provide sufficient guidance and prompts for carrying out the analysis. The guidance can be found at: <http://www.spherehandbook.org/en/protection-principle-1-avoid-exposing-people-to-further-harm-as-a-result-of-your-actions/>



For those sectors or partners seeking more guidance, the *Handbook for the Protection of Internally Displaced Persons* also provides specific and brief sections on protection risks related to: *Food, Nutrition, WASH, Health, Education, and Livelihoods*. (See relevant sections of Part IV of the Handbook which can be found at: <http://www.unhcr.org/protection/idps/4c2355229/handbook-protection-internally-displaced-persons.html>). Sectors and members are, of course, invited to contact the Protection sector with any questions or for further advice.

For the **Project level analysis**, considering the wide variety of projects and diverse partner capacities and working modalities of different clusters/sectors/hubs, it is expected that each coordinator will tailor the process as appropriate to their members. It is recommended that organisations submitting HRP projects, when doing their individual analysis, have at minimum the sectoral-level protection analysis, and the two page Sphere Project Guidance. Based upon these documents (and their experience/exposure during the sectoral level analysis) they can ensure an internal reflection upon their proposed project, the protection risks and mitigating measures, and can document this in the project narrative as required.

TOR final version: 3 Oct. 2016 (ver. 2)

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