

UNHCR Evaluation Management Response	
Evaluation title:	Evaluation of effectiveness of the Protection Transfer Arrangement in Central America.
UNHCR evaluation reference:	ES/2018/12
Entity that commissioned the evaluation:	Regional Bureau for the Americas and Caribbean
Date of Management Response:	1 March 2019
General comments on the evaluation:	<p>The Protection Transfer Arrangement (PTA), in the two years it has been running remains an innovative, multi-country protection response which responds to a complex set of risks faced by people persecuted through violence in El Salvador, Guatemala and Honduras. The Regional Bureau for the Americas (RBAC) commissioned the evaluation at a time when the PTA was moving from a pilot phase into a more consolidated structure which is now embedded in the national protection strategy of each country. RBAC is committed to ensuring that adequate measures are put in place to guarantee maximum impact of the PTA including where necessary introducing further flexibility to meet the urgent protection needs of individuals identified by partners and UNHCR.</p>
RECOMMENDATION 1:	<p>Introduce a Risk Scale which helps define 'heightened risk' for the PTA</p> <p>Introducing a risk scale could be useful for partners and could help resettlement countries understand better the situation of the individuals referred in the PTA. A risk scale could distinguish levels of risk from death threats as the highest risks and needing to be relocated immediately to life threatening events such as physical and verbal abuses that require protection but are not death threats. UNHCR has a Heightened Risk Identification Tool (HRIT), which could be adapted for the PTA.</p>
Management response:	<p><input type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input checked="" type="checkbox"/> Disagree</p>
Reasons (if partially agree or disagree):	<p>RBAC partially agrees for the following reasons:</p> <ol style="list-style-type: none"> 1. The definition of heightened risk by UNHCR is not the issue. The main challenge faced by partners in their identification process is matching individuals with resettlement country criteria, which do not limit themselves only to risk but also a range of other factors including family composition and inadmissibility considerations, for example. Whether individuals receive a death threat or not is not the indicator to determine whether the applicant is at heightened risk or not. By inclusion in the program, they are all

	<p>considered at imminent risk of very serious harm or death. The real indicator is to what degree applicants can be kept safe and for how long given the particular threat against them and the resources available to do so, which is actually a very difficult assessment, as a key factor is how long people can tolerate the safe house conditions.</p> <ol style="list-style-type: none"> 2. RBAC considers that partners referring individuals to UNHCR for inclusion in the PTA process are sufficiently equipped with guidance to identify persons at heightened risk. Further, they have been carefully selected as PTA partners by UNHCR precisely because of their direct interaction with persons at heightened risk. 3. The risks faced by persons fleeing violence in the three countries of origin are highly contextualised. RBAC considers that the concept of risk can be further contextualised even at a country level. The heightened risk identification tool is of global application and has been developed with this global application in mind. It would therefore further constrain well understood national and sub-regional concepts of heightened risk for the purposes of PTA referral that partners and UNHCR have carefully crafted over the project's lifespan. 4. RBAC agrees that further work is needed with partners in all three countries of origin to ensure that the level of risk faced by individuals who are recommended for submission to the PTA have a high likelihood of acceptance by the resettlement country, noting the current length of processing time, the ensuing costs and expectations management for PTA applicants. 				
Unit or function responsible:	UNHCR ROPAN with Country Offices, RBAC and DIP/Resettlement Service				
Top line planned actions	By whom	Comments	Expected completion date	Progress	
				Status	Comments
RECOMMENDATION 2:	<p>Review and improve the formulation of the PTA criteria in its SOPs and the tools used in the PTA.</p> <p>Improving the flow and alignment between the different steps in the assessment, clarifying concepts and definitions, and harmonising the structure of the different tools would make them easier to use. This separation of the steps would enable partners to tailor the selection to different resettlement country criteria, allowing for PTA cases to be submitted to States which have other admissibility or exclusion criteria.</p>				
Management response:	<input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):	<p>Whilst RBAC agrees that as holds true for any mechanism involving case processing, country offices now having rolled out and bedded down the PTA can further streamline the steps and refine the tools, including through sharing good practices across the three UNHCR country offices. However, RBAC disagreed that case processing</p>				

		steps and tools in and of themselves would facilitate tailoring to different resettlement country criteria. The PTA criteria as formulated by UNHCR, will inevitably, and regardless of process steps and tools, be tested by further requirements related to resettlement country criteria and process steps.			
Unit or function responsible:		UNHCR ROPAN with Country Offices, RBAC and Resettlement Service			
Top line planned actions		By whom	Comments	Expected completion date	Progress
					Status
					Comments
2.1	Maintain regular training with partners and UNHCR resettlement staff for common understanding and clarity on resettlement profiles, tailored to specific resettlement country needs	ROPAN and country offices	<p>Two trainings with IOM and USCIS carried out – on 26 November 2018 and on 28 January 2019, in El Salvador and Honduras, respectively.</p> <p>Training in Guatemala pending for 2019.</p> <p>Organise pre-briefing and de-briefing sessions with USCIS officials during circuit rides to discuss situation in each country, security and profiles (pre-brief).</p> <p>Maintain regular communication with USCIS also with a focus on speeding up most vulnerable-at risk cases.</p>	El Salvador and Honduras in February-March 2019	
RECOMMENDATION 3:		<p>Conduct a thorough stakeholder mapping and capacity gap assessment of local partners.</p> <p>UNHCR Country Offices should conduct a stakeholder’s mapping exercise in order to ensure due diligence, effective partnership, and a clearer understanding of power relations within the partnering organizations. Such process is critical to identify strategic partners and avoid fraud, corruption and security breaches. The mapping should be combined with a capacity gap assessment to understand the level of staff, numbers of staff, recruitment needs, and capacity needs with respect to PTA identification and protection demands, in order to prepare training plans and to potentially widen the web of organizations across the country.</p>			
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree			
Reasons (if partially agree or disagree):					
Unit or function responsible:		UNHCR Country Offices			

Top line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
3.2	<p>Harmonize security training for staff and partners, and security assessments for safe houses with follow up on implementation of recommendations.</p> <p>Ensure continued support of the activities of the security advisor based in Honduras on PTA related activities, given his acquired knowledge of the program and its unique security risks.</p>	ROPAN and country offices				
RECOMMENDATION 4:		<p>Review the SOPs and conduct regular needs-based trainings.</p> <p>UNHCR Country Offices should strengthen the SOPs through regular and planned exchanges of lessons learned and best practices amongst Country Offices and ROPAN. This could include considerations of whether a pre-screening by UNHCR is suited before partners invest in developing the full referral file. UNHCR Country Offices should coordinate more closely with the partner organizations and offer them on-going training on case identification, self-care, security protocols, international protection and refugees' mechanisms. Online trainings could be an option to reduce staff time investment in training for both ICMC and UNHCR Country Offices.</p>				
Management response:		<input type="checkbox"/> Agree <input checked="" type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		<p>RBAC does not agree that a pre-screening by UNHCR is necessary as it introduces a further layer of case processing. RBAC agrees that investing in regular training would be better suited to ensuring proper referrals. Such trainings are taking place on a regular basis with partners, IOM, and DHS, until now. New resettlement countries should in the future be added to these trainings. Further, since the evaluation was carried out, DHS, IOM, UNHCR and partners have introduced a bi-weekly coordination call which RBAC observes has improved coordination.</p>				
Unit or function responsible:		UNHCR Country Offices				
Top line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
4.1				Security training: ongoing		

	<p>Finalize Regional SOPs on individual assistance.</p> <p>Include the anti-fraud focal points, as well as resettlement focal points in the Americas anti- fraud training. Offices to conduct fraud awareness training with partners.</p> <p>Share confidentiality sensitization good practice with other partners.</p>	ROPAN		<p>Anti-fraud training: Feb 2019</p> <p>Sharing good practice: ongoing</p>		
RECOMMENDATION 5:		<p>Introduce consistent case management, such as ProGres4, across the participating countries allowing for better monitoring and case tracking.</p> <p>It is critical for data analysis and for closer management and strengthening the effectiveness of the PTA that a standardized monitoring process is crafted and agreed upon by UNHCR Country Offices, ROPAN and RBAC. Better monitoring could also serve as the basis for more targeted capacity development to improve the partner assessment and referrals where data show particular weaknesses and clear data sets could strengthen the efforts to identify resettlement countries and potential donors.</p>				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):						
Unit or function responsible:		UNHCR Country Offices and ROPAN				
Top line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
5.1	<p>Data Management Officer from El Salvador recommended for mission to Guatemala pending the hiring of a new Data Manager in Guatemala.</p> <p>Recommend ProGres support mission to Honduras for ProGres roll-out.</p> <p>Recommend recruitment of Registration Officer within ROPAN to oversee ProGres v4 roll out.</p>	RBAC and ROPAN		Mid 2019		
RECOMMENDATION 6:		Ensure coherent management of the PTA, including budget and expenditure oversight.				

	Consistent and coherent needs assessment and monitoring of the outputs (such as creation of safe houses, services to individuals with PTA cases, staffing costs, etc.) would be required every year to improve results and mitigate risks, while budgets and the expenditures should be closely reviewed, every six months to ensure financial due diligence, monitor the cost of each office and partner, and take corrective steps as required.					
Management response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree					
Reasons (if partially agree or disagree):						
Unit or function responsible:	UNHCR Country Offices and ROPAN					
Top line planned actions	By whom	Comments	Expected completion date	Progress		
				Status	Comments	
6.1	Hold regular PTA focal points meeting as well as mid-year regional PTA staff and partners meeting. Ensure coordination between the Regional Resettlement Officer and the Regional Programme Officer, including through continued planning of joint field missions.	ROPAN		Coordination: ongoing Focal points meeting: June 2019		
RECOMMENDATION 7:	<p>Carefully consider managing the future of the PTA, depending on funding available.</p> <p>It is critical for the Country Offices, ROPAN and the RBAC to think about responsible implementation, including managing expectations regarding the capacity and spaces available for PTA, and to ensure that cases in process are followed through or alternative solutions found.</p>					
Management response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree					
Reasons (if partially agree or disagree):						
Unit or function responsible:	RBAC, ROPAN and UNHCR Country Offices					
Top line planned actions	By whom	Comments	Expected completion date	Progress		
				Status	Comments	
7.1	Discuss with Costa Rica increasing flexibility of transit criteria for PTA and lowering of the costs of the Costa Rica transit arrangements.	ROPAN		Mid 2019		

	Consider alternative transit countries with the needed flexibility for more immediate departures and other possible solutions.					
RECOMMENDATION 8:		<p>Clarify how approaches such as protection transfer arrangements can form part of a broader approach to UNHCR's protection and solutions strategies.</p> <p>The evaluation found that the PTA could have benefited from a coherent organizational approach as both a protection and resettlement tool. Such coherence allow better cooperation among offices; including on how best to implement the mechanism. The evaluation also found that this lack of clarity influenced considerations on whether to prioritize the PTA activities over other protection work for UNHCR's persons of concern, when there was insufficient earmarked funding.</p>				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		<p>In Honduras, Guatemala, and El Salvador, the PTA is incorporated as a component of a broader protection strategy established to support and strengthen national protection for persons of concern to UNHCR. Prolonged support for the program has been critical to better establish and extend the program. As an in country case processing mechanism for a third country solution, the PTA is unlike traditional resettlement activities carried out by UNHCR and many of UNHCR's resettlement partners. In this respect, the PTA has served to inform UNHCR's role in such in-country processing mechanisms. The PTA and other similar initiatives (in the MENA region primarily) has already contributed to building UNHCR's approach to protection using innovative mechanisms of this kind. The PTA and similar initiatives are in line with the approach to responsibility sharing through the search for third country solutions under the Global Compact on Refugees. Resettlement countries have demonstrated their support for the PTA through continued funding to the project, and increasing resettlement commitments, and country offices have mainstreamed the PTA as part of their protection activities, including through the stabilisation of staffing structures.</p>				
Unit or function responsible:		UNHCR's Division of International Protection and RBAC				
Top line planned actions		By whom	Comments	Expected completion date	Progress	
8.1	Ensure that all offices devote dedicated child protection, program and protection officer staff time for PTA cases.	Country offices			Status	Comments
RECOMMENDATION 9:		Carefully consider the rationale for a transit country versus costs- and explore other countries for transit.				

		The current process of the PTA does not allow for immediate transfers to safety and has been found costly overall. A thorough cost-benefit analysis should be conducted with clear data sets for expenditures and the rational for the transit country should be reviewed. Other transit countries could potentially be explored that have willingness to take cases who may eventually require protection on their territory and/or which are less costly.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):						
Unit or function responsible:		RBAC and ROPAN				
Top line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
9.1	<p>National protection and program coordination to track spending.</p> <p>Improved coordination between Regional Resettlement Officer and the Regional Programme Officer, including through continued planning of joint field missions.</p>	ROPAN	ongoing			
RECOMMENDATION 10:		<p>Seek to diversify the pool of resettlement countries for the PTA to continue.</p> <p>The PTA is fully dependent on available resettlement spaces thus finding different resettlement countries is important and can also help with the selection criteria that could become less marked by the USA's admissibility and inadmissibility clauses.</p>				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):						
Unit or function responsible:		RBAC, ROPAN and DIP (RST)				
Top line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
10.1	New resettlement countries identified.	ROPAN, RBAC, DIP	<p>Brazil: selection mission</p> <p>Australia submissions</p>	March 2019		