



NORWEGIAN  
REFUGEE COUNCIL

## Legal Status of Refugees from Syria:

CHALLENGES AND CONSEQUENCES  
OF MAINTAINING LEGAL STAY IN  
BEIRUT AND MOUNT LEBANON



Researched and written by the IRC Lebanon and NRC Lebanon, June 2015

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NORWEGIAN MINISTRY  
OF FOREIGN AFFAIRS

# LEGAL STATUS OF REFUGEES FROM SYRIA:

## Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon

JUNE 2015



## INTERNATIONAL RESCUE COMMITTEE

The International Rescue Committee (IRC) helps people whose lives and livelihoods are shattered by conflict and disaster to survive, recover, and gain control of their future. IRC teams provide health care, infrastructure, learning and economic support to people in 40 countries, with special programs designed for women and children. Every year, the IRC resettles thousands of refugees in 22 U.S. cities.

### IRC LEBANON

IRC began humanitarian programming for Syrian refugees in Lebanon in the fall of 2012. IRC currently works throughout Lebanon, and supports refugees and host communities through protection, child protection, women's protection and empowerment, education and economic relief and development.

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NORWEGIAN  
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## NORWEGIAN REFUGEE COUNCIL

The Norwegian Refugee Council (NRC) is an independent, international, humanitarian non-governmental organisation that provides assistance, protection and contributes to durable solutions for refugees and internally displaced people worldwide.

### NRC LEBANON

NRC has been working in Lebanon since 2006, and has grown significantly since the start of the Syrian crisis. Through its core activities of Shelter, Information, Counselling and Legal Assistance, Education, Community Capacity Building and WASH, NRC provides humanitarian assistance and protection to refugees from Syria, host communities, as well as to the Palestinian refugees already living in the country.

### INFORMATION, COUNSELLING AND LEGAL ASSISTANCE (ICLA) PROGRAMME, LEBANON

In March 2012, NRC commenced its ICLA programme in Lebanon to provide information, counselling and legal assistance to refugees and displaced persons in Lebanon. Currently, ICLA has two main areas of work: (1) the Palestinian refugee response; and (2) the Syrian response.

ICLA activities throughout Lebanon include awareness-raising, legal information, legal assistance, referrals to other service providers, training, legal research and strengthening the provision of legal aid by working with lawyers, jurists and law students.

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# 1. EXECUTIVE SUMMARY

Despite the unprecedented number of refugees in Lebanon, those seeking safety and protection are not considered refugees under Lebanese law. Instead, each person fleeing conflict in Syria is required to obtain entry and stay documentation (residency visas) to be considered ‘legally’ present in Lebanon. Without this documentation, refugees are considered to be contravening the law and can face criminal sanctions which may result in imprisonment, fines or departure orders. As documented in previous NRC reports,<sup>2</sup> for a number of reasons, refugees from Syria have had difficulties consistently obtaining legal entry and stay documentation. Consequently, many refugees have limited legal status which has resulted in numerous coping mechanisms (often negative) to limit the risks of being considered ‘illegally’ present in Lebanon. In addition, when refugees have been able to renew their residency visas, they are often only able to do so by adopting coping mechanisms that, in the current restrictive context in Lebanon, are not sustainable.

This report presents the findings of an assessment conducted jointly by IRC and NRC to identify the challenges and consequences of maintaining legal stay and having limited legal status for refugees in Beirut and Mount Lebanon. Previous NRC reports<sup>3</sup> have covered other areas of Lebanon but this is the first time that there has been a focus on legal status of refugees located in Beirut and Mount Lebanon, which currently hosts the second highest number of refugees in Lebanon (approximately 345,000 UNHCR registered refugees)<sup>4</sup> after the Bekaa Valley (approximately 415,000 UNHCR registered refugees)<sup>5</sup>. The assessment provides additional and valuable information about refugees in Lebanon, focusing on how they cope when not recognised as asylum-seekers or refugees by the host country and the realities of their lives when displaced.

The assessment was conducted between September and December 2014 at a time when the legal and protection situation for refugees was in flux. Recent changes in Lebanese law regarding entry and stay for Syrian nationals and Palestinian refugees from Syria (PRS) have further complicated an already restrictive environment for refugees in Lebanon. New entry regulations which came into force on 5 January 2015 have significantly restricted the number of refugees who are able to enter Lebanon, effectively closing the borders for those seeking protection from armed conflict, violence or persecution. In addition, regulations regarding renewal or regularisation<sup>6</sup> of legal stay (obtaining residency visas) for refugees are complex, costly and arbitrarily applied resulting in many refugees who are unable to renew their residency visas or guarantee their legal stay in Lebanon. PRS have not been included in the new entry or residency regulations, making their situation even more difficult. Recent opportunities for PRS to renew their residency visas were not widely publicised; existed only within an extremely restricted time frame and, in practice, were virtually impossible for PRS to benefit from.<sup>7</sup>

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1 Throughout this report, unless otherwise explained, ‘legality’ and ‘illegality’ regarding entry and stay of refugees each refer to the position under Lebanese law and not necessarily international law.

2 Norwegian Refugee Council, ICLA Programme’s reports on limited legal status, (1) *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled*, December 2013; and (2) *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South*, April 2014.

3 Ibid.

4 UNHCR Syria Refugee Response, Inter-agency Information Sharing Portal, at [<https://data.unhcr.org/syrianrefugees/settlement.php?id=202&country=122&region=88>], last accessed on 16 June 2015.

5 Ibid.

6 Regularisation is required to obtain a legal stay for refugees who have either entered through (a) unofficial border crossings; or (b) official border crossings but overstayed their residency visas.

7 In practice, residency renewal (not regularisation) for PRS could only be obtained between the end of February and the start of May 2015. Currently, it seems there are no possibilities for PRS to renew their residency visas. From NRC fieldwork, very few PRS were able to renew their residency visas and the few that could were only able to renew their residency visa for three months. There were no possibilities to regularise stay for those PRS who had entered through unofficial border crossings or whose residency visa had expired.

## Key Findings

From the assessment findings in Beirut and Mount Lebanon, prioritisation of legal stay was found to be important to refugees from Syria despite the challenges. From those refugees interviewed, **85% had legal stay at the time of the assessment**. For those who did not have legal stay, the main consequences of not having a valid residency visa included lack of freedom of movement (including associated risks of arrest, detention or departure orders), limited access to livelihoods, and restricted access to basic services (particularly healthcare).

From the refugees interviewed for the assessment who at some point during their stay in Lebanon had to renew their expired residency visas (179 refugees interviewed), **68% cited payment of the annual USD200 fee as the main obstacle to renewal**. For those who had legal stay at the time of the assessment, the main coping mechanisms to obtain legal stay include those set out below:

- ▶ Temporary return to Syria in order to try to re-enter through an official border crossing and obtain a new residency visa;
- ▶ Borrowing money to pay for renewal of residency visa;
- ▶ Obtaining forged or unofficial documents; or
- ▶ Prioritising the renewal of the residency visa for the main income-earner in the family.

At the time of the data collection, each of these coping mechanisms involved particular risks that could cause harm to refugees and their families. Nevertheless, refugees decided to undertake these practices to try to improve their situation in Lebanon and sustain their families. Since the data was collected, significant changes in law and practice have meant obtaining legal stay is now virtually impossible for many and these coping mechanisms are not so readily viable. Most notably, the practice of travelling back and forth to Syria to obtain a new residency visa is no longer possible. Refugees are no longer able to simply accumulate debt to obtain legal stay. If unable to obtain the sufficient documentation and/or sponsorship, maintaining legal stay is impossible. In addition, renewal of residency of the main income-earner is now problematic as this family member may not be the head of household, who, according to the new residency renewal regulations, determines the ability of the family to renew their residency. This means that even the potentially harmful ways of coping that refugees previously adopted are no longer possible, leaving refugees in a situation of greater uncertainty and more likely to face the consequences of not having legal stay in Lebanon.

As the situation for refugees in Lebanon worsens, with increased barriers to renewing or regularising residency, accessing work and surviving on humanitarian assistance, it will continue to be essential to understand the effects of these changes on refugees' ability to manage their lives in Lebanon and cope as best as they can. Formulating an appropriate response, together with the international community and the Government of Lebanon is crucial so that refugees in Lebanon do not become more vulnerable and less able to access protection while seeking safety in Lebanon.



## 2. RECOMMENDATIONS



The following recommendations are informed by a combination of the findings of this assessment, ongoing field experience and analysis from IRC, NRC and other operational protection actors.

### **To the Government of Lebanon**

The Government should develop a comprehensive refugee policy and appropriate administrative procedures grounded in refugee rights for all refugees from Syria (including Palestinian refugees from Syria) in Lebanon. Also, in accordance with human rights obligations incorporated into Lebanese law, the Government should apply the spirit and content of these to all persons on its territory, including refugees. More specifically, the Government should consider the points below:

- ▶ Review the entry and residency renewal regulations to ensure they are clearer, applied consistently and less onerous so that refugees can fulfil their requirements without resorting to negative coping mechanisms.
- ▶ Waive all fees required to enter Lebanon and renew residency, including the annual fee of USD200 per person aged 15 years' old and above and the cost of compiling the numerous documents required for entry and renewal of residency.
- ▶ Waive all requirements for refugees to sign any pledge (such as the housing pledge, pledge not to work) or obtain sponsorship in order to renew their residency in Lebanon.
- ▶ Restart UNHCR registration for all refugees.
- ▶ Support more flexibility (at local and national levels) in accepting alternative documentation from refugees who have come to Lebanon with limited documentation and may not have a valid Syrian ID card or a Syrian passport. Allow other documents, including identity documentation that may have expired or is damaged, for daily life, such as crossing checkpoints, renewal of stay, obtaining residency visas for children who turn 15 while in Lebanon, accessing services (including healthcare), approaching police or legal institutions, and in order for refugees to register marriages and births in Lebanon.

### **To International Donors to Lebanon**

International donors should continue to advocate and provide adequate financial and technical support to the Government of Lebanon so that:

- ▶ The Government of Lebanon establishes and upholds a comprehensive refugee policy grounded in refugee rights and in accordance with Lebanon's human rights obligations. Refugees in Lebanon should not be considered as illegal or irregular migrants.
- ▶ The Government of Lebanon establishes clear and appropriate administrative procedures which uphold the rights of all refugees in Lebanon.
- ▶ The humanitarian community is able to operate to support the Government of Lebanon to support all refugees in Lebanon and uphold the rights of all refugees in accordance with established humanitarian and legal principles.

### **To Humanitarian Actors**

Humanitarian actors should support the Lebanese authorities to establish a comprehensive refugee policy grounded in refugee rights and administrative procedures which uphold the rights of all refugees. This policy should ensure that refugees with limited legal status can enjoy the following rights: freedom of movement, access to all necessary

services, access to territory, access to justice and any other basic rights.

Humanitarian actors should continue to strengthen monitoring and analysis on specific priority issues affecting refugee rights so that programming and advocacy are evidence-based. Ongoing protection monitoring efforts on relevant topics should be harmonised and strengthened amongst all protection actors. This should including the following priorities:

- ▶ Consequences of suspension of UNHCR registration and effects on the refugee population's ability to access legal stay.
- ▶ Consequences of not being able to enter Lebanon or renew or regularise residency visas due to the complex, costly and arbitrarily applied regulations.
- ▶ Trends on arrest, detention or departure orders.
- ▶ Joint action and advocacy plans to address violations of refugee rights, including systematised planning for coordinated efforts and initiatives and feedback regarding advocacy and response efforts.

Humanitarian actors should continue to strengthen their information and advisory services to refugees, including the following priorities:

- ▶ UNHCR, in coordination with other humanitarian actors, should continue to expand the unified helpline system where refugees can access information and advice about the changes in registration with UNHCR and understand how their information may be shared outside of UNHCR.
- ▶ Amongst all humanitarian actors, strengthen the provision and coordination of harmonised information and advice regarding legal stay and UNHCR refugee registration and renewal, through promoting a shared understanding of procedures and their application in each specific field area.
- ▶ Provide assistance based on need and vulnerability, not registration status or legal stay, and ensure access to services is possible and available in areas where movement restrictions are more severe.



## 3. BACKGROUND

## Beirut and Mount Lebanon

Beirut and Mount Lebanon are two separate governorates in Lebanon, with Beirut consisting of one district and city; and Mount Lebanon consisting of six districts (Baabda, Aley, Matn, Keserwan, Chouf and Jbeil). The total population of Syrian refugees in Mount Lebanon (313,604) and Beirut (32,395) who are registered with UNHCR is 345,999.<sup>8</sup> There is also a sub-segment of the total refugee population in the area who are not registered with UNHCR. While there have been no comprehensive surveys conducted of this unregistered population, there are estimates that the number of unregistered refugees is between 300,000 and 500,000 throughout Lebanon.<sup>9</sup> In addition, UNRWA<sup>10</sup> estimates that there are 7,500 Palestinian refugees from Syria (PRS) in Mount Lebanon and Beirut.<sup>11</sup>

The combined Beirut and Mount Lebanon area encompasses a mixture of densely urban, residential, and rural areas. It is considered a hub for job opportunities and is also perceived to offer greater opportunities to access shelter and other essential services than less urban locations, all of which may attract refugees from other areas, particularly where there is more community acceptance.<sup>12</sup> Refugees are residing throughout Beirut and Mount Lebanon, mainly renting finished apartments<sup>13</sup> or living in collective shelters or informal tented settlements. Both Syrian refugees and PRS are also seeking shelter in Palestinian refugee camps<sup>14</sup> where rent is comparatively lower.

The security situation, like much of Lebanon, is at times unstable. Both regular and ad hoc checkpoints operated by the Lebanese Armed Forces (LAF), General Security Office (GSO), Internal Security Forces (ISF) and other security forces, including political parties act to limit movement in certain areas. Again, similarly to other areas around the country, Beirut and Mount Lebanon have seen increased tensions between refugee and host communities since August 2014,<sup>15</sup> in some cases resulting in targeted violence against Syrian refugees.<sup>16</sup>

8 UNHCR, Syria Refugee Response, *Beirut and Mount Lebanon Governorates, Distribution of the Registered Syrian Refugees at the Cadastral Level*, 31 May 2015, at [<http://data.unhcr.org/syrian-refugees/region.php?id=91&country=122>].

9 The Daily Star, *Flow of Syrian Refugees to Lebanon drops after restrictions*, 20 January 2015 at [<http://www.dailystar.com.lb/News/Lebanon-News/2015/Jan-20/284715-flow-of-syrian-refugees-to-lebanon-drops-after-restrictions.ashx>], last accessed on 16 June 2015.

10 The United Nations Relief and Works Agency which is mandated to provide assistance to Palestinian refugees in its five areas of operation (Gaza, Jordan, Lebanon, Syria, and the West Bank).

11 UNRWA, *PRS update*. 30 June 2014, Issue. 36.

12 See NRC and Save the Children, *Evictions in Beirut and Mount Lebanon: rates and reasons*, December 2014, page 11.

13 *Ibid*, page 8.

14 There are four official camps for Palestinian refugees in Beirut and Mount Lebanon: Burj al-Barajneh, Dbayeh, Mar Elias and Shatila.

15 During August 2014, fighting erupted in Aarsal, a border region of Lebanon. The Lebanese Armed Forces (LAF) directly clashed with armed groups, including Islamic State and Jabhat el Nusra. IRC's protection monitoring reported that in response, the GoL tightened security countrywide, including conducting raids in Syrian collective sites/informal settlements, and municipalities placed further restrictions on movements in the form of curfews.

16 IRC, *Mount Lebanon Protection Monitoring Report*, October 2014.

## LIMITED LEGAL STATUS

For the purpose of this assessment and report, refugees who do not have 'legal' entry or stay in Lebanon are described as 'persons with limited legal status in Lebanon' instead of being described as merely 'illegal', with the intention of recognising the limitation of their rights in practice, whilst not ignoring the international principles that underline refugee rights. Limited legal status refers to individuals who come within one of the below categories:

- i. Refugees who have entered Lebanon through unofficial border crossings and have not regularised their stay in Lebanon; or
- ii. Refugees who have entered through official border crossings but have then not renewed their Lebanese residency visa once it has expired.

### Entry and Renewal of Residency in Lebanon

Lebanon is not a signatory to the 1951 Convention relating to the Status of Refugees or its 1967 Protocol. Consequently, Lebanon does not confer any special status on refugees from Syria, requiring all to obtain entry and stay documentation in accordance with Lebanese law. Lebanon has incorporated most of its human rights obligations into the Lebanese Constitution,<sup>17</sup> including the Universal Declaration of Human Rights, which states that 'Everyone has the right to seek and to enjoy in other countries asylum from persecution'.<sup>18</sup> This means that individuals entering another country to seek asylum should not be considered to be present illegally. Nevertheless, the Lebanese authorities consider persons fleeing the Syrian conflict to be illegally present in Lebanon if they have entered through an unofficial border crossing or have not been able to renew their residency visa in accordance with Lebanese national law.

These persons find themselves in a grey area where, to date, they have not been subject to physical deportation - although refugees have received departure (or 'self-deportation') orders requiring them to leave Lebanon within a stated time. They are regarded by Lebanese authorities as having no legal basis for remaining in Lebanon. This results in refugees' exposure to temporary detention or criminal proceedings.

Early in the Syrian crisis, Syrians (including refugees) who entered Lebanon through an official border crossing would be granted an entry coupon free of charge for an initial six-month stay which could then be renewed every six months, with payment of an annual fee of USD200 per person (15 years' old and above).<sup>19</sup> Since then, the procedures and regulations implemented by the Government of Lebanon (GoL) with regard to refugees from Syria have undergone, and continue to undergo, a number of changes, particularly since May 2014,<sup>20</sup> which have had significant impacts on the protection space available for this population.

17 In its Preamble §B, the Lebanese Constitution provides: "Lebanon is also a founding and active member of the United Nations Organization and abides by its covenants and by the Universal Declaration of Human Rights".

18 Article 14 (1) Universal Declaration of Human Rights.

19 Norwegian Refugee Council, ICLA, *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South*, April 2014, page 12.

20 Changes in entry and stay regulations for Palestinian refugees from Syria started much earlier than for Syrian refugees. They started in the summer of 2013 when restrictions on entry and renewal already came into effect.

After initial GoL declarations that refugees travelling between Syria and Lebanon would lose their UNHCR registration status,<sup>21</sup> regulations governing entry and stay for refugees in Lebanon have progressively tightened. On 23 August 2014, the GSO issued a Circular stating that any refugee with limited legal status would be exempt from the applicable fees payable at the border if they chose to return to Syria.

A series of Circulars issued during September 2014<sup>22</sup> waived the residency regularisation fees for Syrians who had either entered Lebanon officially or unofficially and had limited legal status. The waiver, allowing gratis regularisation, only applied to those whose residency visa had expired before 21 August 2014. The gratis regularisation procedures were only available until 31 December 2014 and only to those who fell within the specific criteria. Just weeks after publicising the waiver, from late September, severe tightening of border entry regulations resulted in many Syrian refugees being unable to enter Lebanon. UNHCR estimated that there was a 75% decrease in the entry of refugees.<sup>23</sup>

On 24 October 2014, the minutes of the Council of Ministers meeting held on 25 April 2014 were published which set out GoL policy regarding refugees from Syria. The Ministerial Committee for Displaced Syrians (established by the Council of Ministers) summarised the GoL position on 'displaced' Syrians in Lebanon in three key policy priorities: firstly, the government will seek to reduce the number of Syrians in Lebanon by reducing access to territory and encouraging Syrian nationals to return to Syria; secondly, individuals that temporarily return to Syria from Lebanon for any reason will no longer be considered 'displaced'; and, thirdly, GoL will seek to enhance security by increasing regulation of the Syrian population in Lebanon, providing additional support for municipality police and requiring municipalities to undertake regular statistical surveys.

On 31 December 2014, the GSO issued a Circular introducing new entry and residency rules for Syrian nationals taking effect from 5 January 2015. On 13 January, 3 and 23 February 2015, the GSO issued further regulations concerning entry, residency renewal and regularisation. These regulations provide that Syrian nationals (PRS are not included) wishing to enter Lebanon will be admitted upon presentation of valid proof of identity and other specific documents to support the stated purpose of their stay in Lebanon, which must fall into one of a number of approved categories. A list of categories for which admission would be granted was provided, as well as the duration of the authorised stay in Lebanon for each category. Currently there are no categories for those fleeing armed conflict, violence or persecution and seeking safety in Lebanon. There is however a category for 'displaced' requiring compliance with either: a) one of the other entry categories; or b) the limited GoL 'humanitarian exceptions criteria' initially presented by MoSA and which has not yet been shared publicly in final form.

For those already in country (before 5 January), six-month renewal of a residency visa for a Syrian national may be based on either a UNHCR registration document, or sponsorship (evidenced through a pledge of responsibility) undertaken by either an institution, an employer, or a Lebanese guarantor for a single Syrian family. With both a UNHCR registration document and some forms of sponsorship, a Syrian national is also required to sign a pledge not to work. Both categories require additional documentation, which can also be costly and difficult to obtain. These include a housing pledge regarding the shelter where the refugee lives, indicating entitlement by the landlord/landowner to lease the property to the Syrian tenant. Both categories of residency renewal are problematic:

21 On 31 May 2014, the Minister of Interior issued a statement that refugees who travelled back to Syrian to vote and then tried to return to Lebanon would have their UNHCR file deactivated. See The Daily Star, *Lebanon asks refugees to refrain from entering Syria*, 31 May 2014, at [<http://www.dailystar.com.lb/News/Lebanon-News/2014/May-31/258408-lebanon-asks-refugees-to-refrain-from-entering-syria.ashx>], last accessed on 16 June 2015.

22 On 11 September 2014, GSO issued an announcement calling on "Syrian nationals who are residing in Lebanon and are in breach of stay rules to approach the regional GSO to regularise their stay without paying any fees." The details (including criteria for eligibility) were provided through a Circular published on 15 September 2014 followed by another Circular on 18 September 2014.

23 UNHCR estimated this in line with the decrease in the number of refugees approaching UNHCR for registration appointments. See UNHCR Lebanon, *Protection Update*, 20 October 2014.

the sponsorship system potentially increases Syrian's exposure to exploitation, and the pledge not to work renders Syrians dependent on humanitarian assistance or debt and/or forces them to face potential criminal sanctions if they work in contravention of it.

The situation for PRS is even less clear, with some indication that they may renew their residency in theory but, in practice, there are very few instances where PRS are able to do this. With no officially published regulations regarding the procedures for renewal of their residency visas, it is difficult to understand under what circumstances PRS may renew their residency in Lebanon.

The cumulative result of these GoL policy measures is the marked narrowing of the protection space available to refugees from Syria in Lebanon.



## 4. METHODOLOGY OF THE ASSESSMENT



## Research methods and target group

For the assessment, in addition to a review of secondary data from a number of reports, primary data was collected using a combination of quantitative and qualitative data-collection tools.

Based on the objectives of the assessment, the population groups targeted by this assessment are:

- a. Syrian refugees registered with UNHCR;
- b. Syrian refugees who are not registered with UNHCR; and
- c. PRS.

## Sample selection

For the quantitative data collection, a *randomised cluster sampling* technique was used. This technique involves the division of a larger population into groups (or clusters). Municipality boundaries were used as the means of creating these divisions within the population of UNHCR-registered Syrian refugees. Then, a random sample of each cluster was selected from whom the information required for the assessment was gathered.

Given that there is no comprehensive data on Syrians not registered with UNHCR, and the limited capacity to also cover a random cluster sample for PRS, IRC and NRC decided to collect quantitative data only for Syrian refugees registered with UNHCR.

A representative sample of the targeted population was selected using the number of Syrian households registered with UNHCR (77,892 households as of 30 September 2014) at the cadastral level in Beirut and Mount Lebanon. Using 'Raosoft',<sup>24</sup> a sample size calculator, the sample size was automatically calculated at 383, this number being representative of the 77,892 households, rounded up to 390. In addition to the set sample, 13 further interviews were conducted to account for possible errors in data. A total of 403 households were interviewed for the quantitative data.

A total of ten households were interviewed per cadastre, resulting in 39 cadastres randomly<sup>25</sup> selected across Beirut and Mount Lebanon. The ten households in each cadastre were chosen randomly using the snowball<sup>26</sup> method. This method is a technique for gathering research subjects through the identification of an initial subject (here being an NRC or IRC beneficiary) who then provides to the enumerators names of other persons within the same group (Syrian refugees registered with UNHCR).

NRC and IRC beneficiaries were chosen as initial subjects in order to provide the interviewee with comfort and safety in sharing information and being confident of beginning the snowball and giving out other names.

## Qualitative data collection

Given that there is no comprehensive data on Syrian refugees not registered with UNHCR and limited capacity (explained further below) to also use a random clustered sample for the PRS population, NRC and IRC decided to collect qualitative data for the mentioned two groups by interviewing key informant, focus groups and in-depth interviews with samples from these groups.

## Data collection

The data collection extended: from the end of September 2014 until the beginning of December 2014. The quantitative data was collected by enumerators from NRC and

24 <http://www.raosoft.com/samplesize.html>

25 Using this system, cadastres that host a larger number of refugees are more likely to be selected.

26 <http://srmo.sagepub.com/view/the-sage-encyclopedia-of-social-science-research-methods/n931.xml>.

IRC through 403 individual interviews based on a questionnaire, with each interview lasting between 10-20 minutes. Due to incomplete data, information from eight individual interviews had to be deleted, leaving 395 individual interviews as a basis for the analysis.

The qualitative data collected by the NRC and IRC teams included a total of six focus group discussions (FGDs), three were conducted with only women and three others with only men. Each tackled specific profiles of refugees, such as PRS living inside or outside Palestinian refugee camps, Syrian refugees not registered with UNHCR and Syrian refugees registered with UNHCR. Each FGD lasted approximately one hour and a half. Five in-depth interviews with refugees not registered with UNHCR (including one with a PRS) were held in confidential locations, and lasted around one hour. In addition, key informant interviews were conducted, including with one *Mukthar*, two representatives of UN agencies, three municipality members, coordinators and representatives from the Ministry of Social Affairs, the Ministry of Interior and the Ministry of Public Health.

### **Consent and confidentiality**

Consent was sought from all participants and it was clarified that their willingness to participate in the assessment would not impact on their access to NRC or IRC services. Specific measures were taken to ensure the confidentiality of the information provided to NRC and IRC during the assessment, and the safety of the interviewees, including obtaining free and informed consent and providing a clear explanation of the purpose, expected use and methodology of the assessment. All refugees interviewed were guaranteed anonymity in relation to their answers for the assessment and any information provided has been dealt with confidentially.

### **Validation Exercise**

IRC and NRC presented the key findings of the assessment to the Beirut and Mount Lebanon Protection working group on 4 June 2015. The participating agencies reviewed the findings and unanimously confirmed that, in relation to legal stay, they had observed similar results in the field.

### **Limitations**

Although the population targeted for this assessment was the entire Syrian population, including registered and non-registered with UNHCR and PRS, only Syrian refugees registered with UNHCR were targeted for the quantitative data collection. The remaining categories were included in the qualitative parts of the assessment.

The PRS population was not assessed quantitatively for a number of reasons, including limited access to the Palestinian refugee camps due to lack of security clearance and limited outreach activities targeted towards Palestinian refugees. For Syrian refugees not registered with UNHCR, with no comprehensive data on them, this part of the population could not be as accurately represented according to sample size.

For these reasons, NRC and IRC decided to conduct qualitative assessment regarding PRS and Syrian refugees not registered with UNHCR.

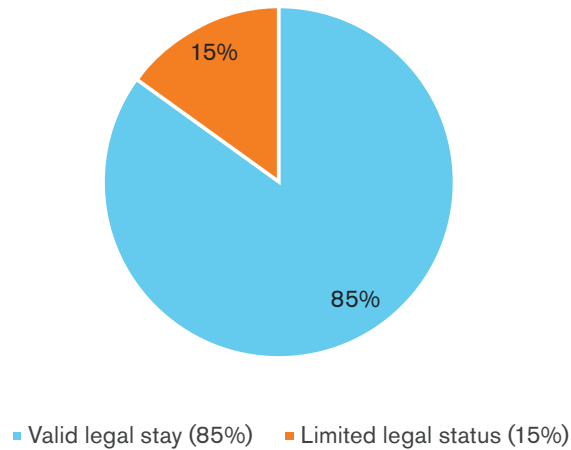
Initial findings from the refugees interviewed indicated that a large number of refugees did have valid residency visas and a smaller number of refugees had limited legal status. This was different to previous NRC assessments conducted in other areas in Lebanon regarding the consequences of limited legal status and so questions that initially focused on limited legal status were not as relevant for those with residency visas. More focus could have been given to developing and including questions on challenges faced by those who were able to maintain their legal stay.



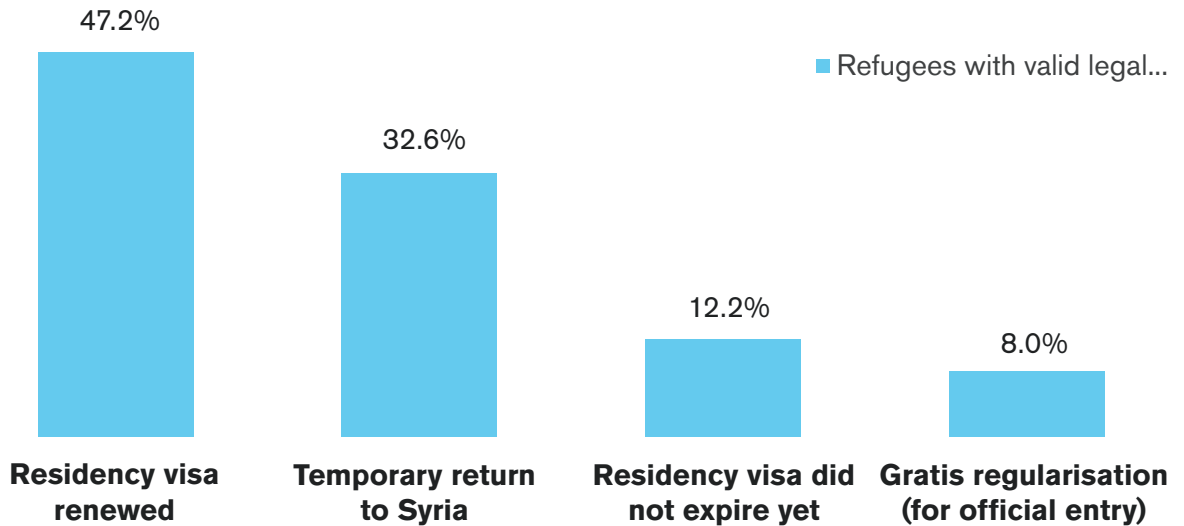
## 5. KEY FINDINGS

## A. PRIORITISATION OF LEGAL STAY

Syrian refugees and PRS in Mount Lebanon prioritise legal stay despite the barriers they face in accessing it. Syrian refugees in focus group discussions and in-depth interviews unanimously agreed that obtaining legal stay is important and refugees do go to great lengths to maintain it. This is indicated by the high percentage of refugees interviewed that have legal stay (85%), as shown in Figure 1. Paradoxically, the relatively high percentage of refugees enjoying legal stay in Mount Lebanon reduced the relevance of the opportunity provided by the GoL Circular permitting gratis regularisation for refugees during the last four months of 2014, since this opportunity was only extended to those whose legal stay had expired as at 21 August 2015. As shown in Figure 2, most refugees (47.2%) interviewed were able to renew their residency visa in Lebanon while 32.6% renewed their residency by travelling back and forth to Syria.



**Figure 1:** Percentage of refugees interviewed with valid legal stay (85%) or with limited legal status (15%) (Sample size: 395 refugees).



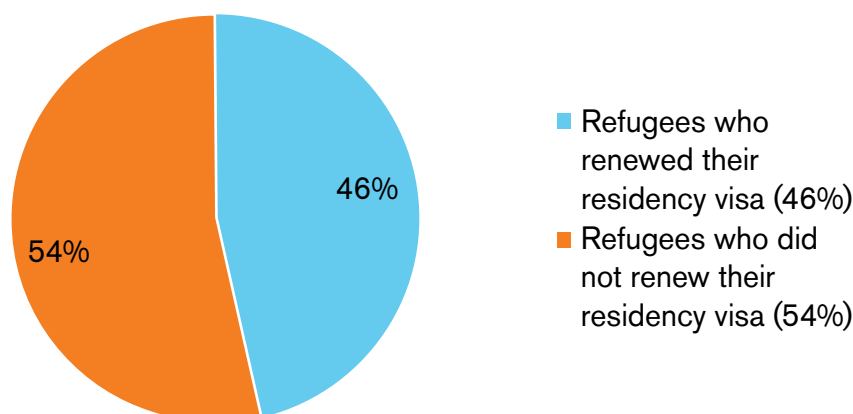
**Figure 2:** Categories of valid legal stay - percentage of each category for refugees interviewed (Sample size: 337 refugees).

PRS also emphasised the significance of legal stay, especially for those living in the Palestinian refugee camps in Mount Lebanon. In one focus group discussion, one PRS explained that, “All of our problems are a result of their limited legal status.”<sup>27</sup> Since the data collection at the end of 2014, PRS have been mostly unable to access legal stay as PRS are not included in the January 2015 Circulars. Although it has been difficult for PRS to renew their residency visas since 2013, there were more opportunities for them to do so before 2014.<sup>28</sup>

Irrespective of the fact that the majority of interviewed refugees have access to limited income, and depleted savings, refugees are taking a number of measures to maintain their legal stay, including: 1) going into debt; 2) risking returning to Syria; or, 3) obtaining false documents in order to maintain legal stay. Conversely, obtaining civil documentation (such as birth registration or marriage registration documents), was not identified as a priority for refugees despite the significant long term consequences including lack of documentation and the potential for statelessness.

## B. COPING MECHANISMS FOR PRIORITISING LEGAL STAY

At the time this assessment was conducted, Syrians, including refugees, who entered Lebanon through an official border crossing, were granted an entry coupon and a residency visa free of charge for an initial six-month stay in Lebanon. This residency visa could then be renewed after six months for free, and then after 12 months for LBP300,000 or USD200 per person (fifteen years old and above).<sup>29</sup>



**Figure 3:** Percentage of refugees interviewed who did or did not renew their residency visa (Sample size: 343 refugees).

343 refugees<sup>30</sup> interviewed had a residency visa that expired at some point during their stay in Lebanon. 54% of these 343 refugees said that they were not able to renew their residency visa for a variety of reasons. Of these, 68% cited the cost of renewal (annual fee of USD200 per person) as the major inhibiting factor. As one refugee said, “We can barely cover the household expenses, how can we pay for the renewals?”<sup>31</sup>

27 Focus Group Discussion, 30 October 2014, Palestinian Refugee Women from Syria, Burj al-Barajneh.

28 Two internal memoranda have been issued on 2 February 2015 and 2 March 2015 which have allowed PRS to renew their residency for three months. A number of conditions have to be met and, in practice, very few are able to do so.

29 The Circular issued on 31 December 2014 has introduced new entry and residency renewal procedures for Syrian nationals, including refugees, who enter Lebanon from 5 January 2015. As for Syrians who were in country prior to that date, new highly complicated regulations concerning residency renewal and regularisation have been issued.

30 343 was calculated by subtracting the refugees who had entered through unofficial border crossings (11 refugees) and the number of refugees whose residency visa had not expired since they first arrived (41 refugees) from the total number of refugees interviewed (395).

31 Focus Group Discussion, 11 November 2014, Syrian Refugee Women, Sad El Bouchrieh.

To circumvent this challenge, the findings of the assessment show that refugee families often adopt coping mechanisms to deal with the possibility of having limited legal status. Some of these are not possible anymore due to the new entry and renewal regulations<sup>32</sup>. The main coping mechanisms identified in this assessment are as follows:

- ▶ Temporary return to Syria in order to try to re-enter through an official border crossing and obtain a new residency visa;
- ▶ Paying for forged documents; and/or
- ▶ Borrowing money.

### Temporary Return to Syria

In order to avoid the prohibitively high cost of residency renewal, 32% (110 individuals) of interviewed refugees with a valid residency visa<sup>33</sup> reported temporarily crossing back into Syria in order to cross back into Lebanon and then obtain an entry coupon which would be valid for an initial six months and renewable for free for a further six months. While 60% of those who reported returning to Syria did so primarily for other reasons (such as accessing medical care, checking on family members, etc.), 40% returned specifically in order to be able to re-enter Lebanon and acquire a new residency visa. Among the refugees interviewed, women were slightly more likely to return to Syria in order to maintain their legal stay than men (47% of women selected this as a coping mechanism, as opposed to 38% of men). This variance is attributable to the perception that women face fewer protection risks (such as detention or confiscation of documents) at the checkpoints within Lebanon and when crossing borders - including on the Syrian side where men may be stopped if they have not completed their military service.

Adoption of this coping mechanism by refugees is consistent with the findings in Parts One and Two of NRC's assessments on the *Consequences of Limited Legal Status for Syrian Refugees in Lebanon*<sup>34</sup>. However the percentage of refugees adopting temporary return to Syria as a means of maintaining legal stay is higher in the current assessment than in the previous ones, which reflects the higher overall percentage of refugees having a valid residency visa in this assessment.<sup>35</sup> In addition to being extremely dangerous,<sup>36</sup> this coping mechanism of temporarily returning to Syria to cross back into Lebanon has become significantly more difficult since the heavy restrictions imposed on Syrian refugees which started from early September 2014 and more formally from 5 January 2015.

It is worth noting that due to the increased border restrictions since the summer of 2013, PRS have not been able to adopt this coping mechanism. Those PRS interviewed who at the time of the assessment were unable to afford the renewal fees did not have the option of returning to Syria.

<sup>32</sup> See 'Background' section above for further information.

<sup>33</sup> 85% of the total number of refugees interviewed had legal stay.

<sup>34</sup> For more information, see Norwegian Refugee Council, ICLA Programme's reports on limited legal status, (1) *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled*, December 2013; and (2) *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South*, April 2014.

<sup>35</sup> 15% out of 395 Syrian refugees interviewed are in a situation of limited legal status compared to over 50% of the 1,256 Syrian refugees interviewed for NRC's report on limited legal status, Part Two.

<sup>36</sup> An elderly women reported that when she returned to Syria to renew her visa she was detained by the police in Syria, Focus Group Discussion, 11 November 014, Syrian Refugee Women, Sad El Bouchrieh.

## Paying for Forged Documents

During the focus group discussions, Syrian refugees and PRS who were unable to maintain legal stay reported resorting to other potentially harmful coping mechanisms, including obtaining forged stamps and other documents. In some instances, refugees are approached by a *simsar*<sup>37</sup> who claims that s/he can obtain legal stay on behalf of the refugee for under USD200.<sup>38</sup> Refugees wary of approaching the GSO are at times unaware that documents obtained through this mechanism may be forged or fraudulently obtained.<sup>39</sup> Under Lebanese law, obtaining forged documentation is a criminal offence that can result in sanctions including any or all of the following: detention, issuance of a departure order or a permanent ban on re-entry to Lebanon. As one interviewed refugee said, “Before the circular [for gratis regularisation], we used to give money to someone to get the service done, and then it appears that the documents are forged.”<sup>40</sup>

## Borrowing Money and/or Prioritising the Renewal for One Family Member

Of the refugees interviewed, 85% (337 individuals out of the 395 interviewed) had a valid residency visa at the time of the interview. 104 (31%) of those with valid residency visas renewed their visas by paying the USD200 annual renewal fees. In the focus group discussions held as part of the assessment, many Syrian refugees reported that they were only able to pay the renewal fees by borrowing money. Although outside the scope of this assessment, several assessments conducted in 2014 showed that debt was one way that Syrian refugees meet expenditure requirements related to legal stay.<sup>41</sup>

On the whole, the earning capacity of many refugees in Lebanon is low while the cost of living is high, and consequently many cannot afford to cover their basic needs.<sup>42</sup> In Beirut and Mount Lebanon, families assessed were on average made up of five members and usually only up to two family members were working as daily labourers with an unreliable income depending on what labour might be available. At the same time, the average family composition included three individuals older than 15 years old, meaning that at least three family members would have to pay the annual fee<sup>43</sup> to renew their residency visas, totalling an annual amount of USD600. In addition, 85% of the refugee families assessed pay a monthly rent as they live in private rented apartments.<sup>44</sup> In some cases, refugees also have to pay up to USD100 to the Municipality to ‘register’, which is considered as a type of tax. However, when making choices about spending limited funds, refugee families living in Beirut and Mount Lebanon seem to prioritise the renewal of the residency visa along with other basic needs.

37 An expression used in Lebanon to denote a ‘broker’.

38 Focus Group Discussion, 11 November 2014, Syrian Refugee Men, Sad El Bouchrieh.

39 Ibid.

40 Ibid.

41 According to WFP’s Vulnerability Assessment for Syrian Refugees (VASyR) carried out in 2014, 27% of Syrian refugees depend on debts/loans as a second source for livelihood. “The possibility of gaining formal waged labour or informal permanent work is deemed as almost impossible for most refugees and the majority depend on both cash assistance and debt to meet expenditure requirements,” Save the Children, *Rapid Assessment of Syrian Refugee Needs, Priorities and Coping Strategies in Lebanon*, December 2014, page 7.

42 In its report on the Labor Market in Beirut and Mount Lebanon, Acted notes “The average full time monthly average salary of approximately \$380 for males and \$207 for females, and one in four Syrians reported only finding work one to three days per week. It is significant that the average wage of Syrian workers does not cover the cost of basic needs; the Survival Minimum Expenditure Basket in Lebanon is \$435”; Acted, *Acted, Labour Market Assessment in Beirut and Mount Lebanon*, January 2014, page 22.

43 This is assuming that these family members entered through official border crossings and had expired residency visas.

44 According to the Save the Children and NRC report on evictions in Beirut and Mount Lebanon: “The mean rent for a finished housing unit in these governorates [Beirut and Mount Lebanon] is USD \$348.66. This is noticeably higher than the mean rent for a finished housing unit in Lebanon overall, which stands at USD \$200”; Save the Children and NRC, *Evictions in Beirut and Mount Lebanon: Rates and Reasons. Shelter Assessment of Urban Settings Examining Security of Tenure in the Governorates of Beirut and Mount Lebanon*, December 2014, page 11.

Another coping mechanism identified by this assessment is that families prioritise the renewal of the residency visa for the main income-earner in the family, often a male member of the household. 35% of the interviewed Syrian refugees who have successfully renewed their residency reported not renewing residency visas for the whole family. The main reason given for not renewing is the high cost, particularly where families have a number of members over the age of 15 years old. This often leaves the other members of the family without legal stay documentation and subject to the consequences outlined in this report.

### C. CHALLENGES FACED BY REFUGEES WITH LIMITED LEGAL STATUS

The two main challenges that refugees with limited legal status reported in this assessment<sup>45</sup> were (1) restrictions on their freedom of movement (67% of those interviewed); and (2) challenges accessing healthcare services (55% of those interviewed). In the focus group discussions, two additional challenges emerged – (1) access to livelihoods; and (2) difficult relations with the host community.

#### Limited Freedom of Movement



**Figure 4:** Main consequences as a result of limited freedom of movement for refugees with limited legal status.

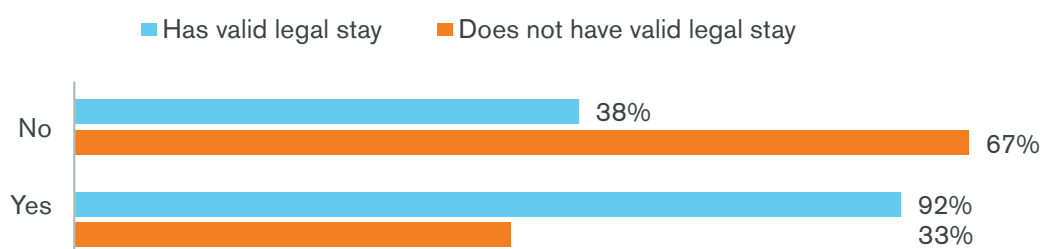
This assessment demonstrates that Syrian refugees with limited legal status in Lebanon experience restrictions on their freedom of movement. As set out in Figure 5, out of the 58 Syrian refugees interviewed with limited legal status, 67% reported fear of movement as a key challenge, while only 38% of those with valid residency visa (125 individuals) reported similar restrictions. These restrictions include both those explicitly imposed by features of the external environment (such as formal or informal checkpoints), and refugees’ self-imposed limitation of their movements due to their perception of other risks that they may have faced or heard about, such as the issuance of departure

<sup>45</sup> The percentage may be more than 100% because Syrian refugees interviewed were asked to identify two main challenges they face due to their limited legal status.



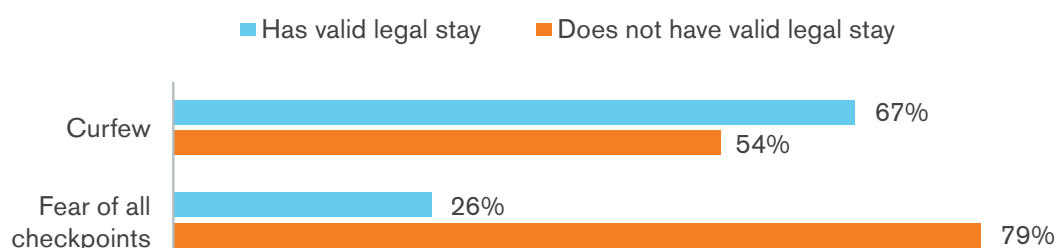
orders or confiscation of documents. Restricted movement has serious consequences for refugees' physical and mental wellbeing, including through limiting access to essential services, preventing family reunification, and hindering the search for livelihood opportunities. In focus group discussions, refugees reiterated that restrictions on freedom of movement are the most significant consequence of limited legal status, citing personal experiences.

## Do you feel free to go outside of the area where you are living



**Figure 5:** Percentage of refugees interviewed (with or without valid legal stay) who do or do not feel free to go outside of the area that they live (refugees could give more than one answer).

## Why don't you feel free to go outside of the area where you are living?



**Figure 6:** Reasons given by refugees interviewed for not feeling free to go outside of the area they live (refugees could give more than one answer).

### Fear of Crossing Checkpoints

Of 58 individuals with limited legal status, 79% identified the fear of crossing checkpoints<sup>46</sup> as the primary limitation on their movement, while only 26% of those with valid legal stay identified this. Discussions during focus groups highlighted the way in which limited legal status is directly linked to refugees' fears of arrest and detention when attempting to cross checkpoints.

In four of the focus group discussions it was noted by both refugee men and women that refugee women are less likely than men to be stopped at checkpoints and, if stopped, less likely to be detained.<sup>47</sup> This is most likely attributable to the perception that women pose a reduced security risk compared to men. At the time of data collection, only 5% of detained refugees being assisted by UNHCR were women.<sup>48</sup>

<sup>46</sup> For official or unofficial checkpoints.

<sup>47</sup> This perception is consistent with the findings in the Part One and Part Two of NRC's assessments on limited legal status. See footnote 2.

<sup>48</sup> Key Informant Interview, 3 December 2014, UNHCR.

PRS also identified the restricted freedom of movement as the main challenge of having limited legal status. This is particularly true for PRS who are living in the official Palestinian refugee camps in Mount Lebanon where LAF checkpoints are present at the main access points to each camp. Highlighting the way in which fears of arrest at checkpoints detract from dignity, one refugee focus group participant commented, “Before the amnesty [gratis regularisation] we were living here in the camp as if we were in jail.”<sup>49</sup>

### Curfews

Of those with limited legal status (58 individuals interviewed), 54% identified curfews as a key limitation to their movement. The impact of curfews was felt more equally by those with and without legal stay than was the case regarding the fear of crossing checkpoints. Curfews were actually regarded as a comparatively greater impediment to freedom of movement for those with legal stay than for those without, with 72% of those with legal stay stating that curfews limited their movement. This variance can be interpreted as a reflection of the fact that those with limited legal status are more likely to choose to restrict their own movement than those with legal stay, which reduces the felt impact of curfews for them.

### Limited Access to Services (Especially Health Services)

Constraints on access to health services are directly linked to the restrictions on freedom of movement outlined above. Healthcare in Lebanon is often costly, 55% of those refugees with limited legal status who reported constraints accessing healthcare attributed those constraints to cost. Fear of crossing checkpoints was cited by 68% of refugees with limited legal status who reported constraints accessing healthcare, as a reason for those constraints. When prioritising the causes for constraints on access to healthcare, 61% of refugees with limited legal status and experiencing constraints reported that fear of checkpoints was the primary constraint they faced, compared to 27% citing cost of healthcare and 11% citing the cost of transportation as the primary barrier.<sup>50</sup> In contrast, only 2% of refugees with valid legal stay and experiencing constraints on access to healthcare cited checkpoints as the primary concern. A refugee father explained, “Once my son was sick and I went to get him medicine. On my way I had to pass through a checkpoint. I had an expired visa, so I told the officer I don’t have my papers on me but I showed him the UNHCR registration certificate. The officer looked at me saying he doesn’t care about me or about the UNHCR and he let me though. I was lucky this time, but the UNHCR registration certificate is not useful at all, not even for protection.”<sup>51</sup>

In Mount Lebanon there are at least 19 UNHCR-contracted hospitals that offer emergency and specialised health services. The inability to access specialised services is especially acute in the Palestinian Refugee camps in Mount Lebanon, where there is only one hospital in the Burj al-Barajneh refugee camp. Those with limited legal status are often unable to obtain specialised care. During a focus group discussion one family reported discontinuing physiotherapy treatments for their six-year old daughter due to their inability to regularise the male head of household’s legal stay.<sup>52</sup> Another Palestinian family was unable to get tested to see if the head of household has cancer or not, as advised by his doctor.<sup>53</sup>

49 Focus Group Discussion, 30 October 2014, Palestinian Refugee Women from Syria, Burj al-Barajneh.

50 For these options, refugees interviewed could cite more than one reason and so the percentages add up to more than 100%.

51 Focus Group Discussion, 19 November 2014, Syrian Refugee Men Registered with UNHCR, Sad El Bouchrieh.

52 Focus Group Discussion, 30 October 2014, Palestinian Refugee Men coming from Syria, Burj al-Barajneh.

53 Ibid.

## Access to Work/Livelihoods

The lack of access to work opportunities has had direct impacts on refugee families. A PRS recounted what his son told him when he was able to find work and subsequently provide his family with meat, "I have not eaten chicken in seven months, and I was crying when I saw my son eating and saying, 'Dad why have you not brought us chicken before?'"<sup>54</sup>

The second largest negative aspect of having limited legal status stay was obstacles to employment, the first being general restrictions on freedom of movement. Of the 23 men<sup>55</sup> interviewed who had limited legal status, only one reported having regular work.<sup>56</sup> In a focus group discussion, two refugee women said both of their husbands stopped working the day their residency visa expired.<sup>57</sup> They did so due to risks of detention when travelling to work, as well as risks of detention in the event of a raid on their workplace. Employers are often willing to overlook refugees' lack of work permits but many still require refugee employees to have legal stay. The situation is particularly difficult for refugees who are undocumented or entered Lebanon through unofficial border crossings. One such refugee explained that accessing livelihood opportunities has been especially challenging, "I have no papers so no one wants to hire me because they do not want to endorse the responsibility in case something happens. I cannot work because it is required to have an ID or legal stay, without it, it is not possible. If I work and something happens during my working hours, something gets stolen or there is a fight, I will be the first one to be accused."<sup>58</sup> This dilemma is essentially a 'catch 22' situation; refugees from Syria require access to work to afford the fees to obtain legal stay in Lebanon, but with limited legal status they are less likely to access work.

As humanitarian assistance is decreasing, refugees now more than ever need to earn income to support themselves. Yet, refugees are now facing increasingly limited options. While some refugees are able to renew their residency sponsored by their employer, many are unable to do so. Refugees without a work sponsor are being forced to choose between obtaining a residency visa and signing a pledge not to work, or conversely not having legal stay and facing additional barriers accessing work. These additional barriers to employment create further challenges for Syrian refugees to support their basic needs.

## Relations with Host Community

Interviewed refugees stated they are at increased risk of exploitation and abuse from the Lebanese host community if they have limited legal status. They expressed fear of being reported to the authorities. "I am always scared, any time I can be threatened. I always avoid talking to Lebanese people in order not be asked about my legal stay. If they find out I do not have legal stay, they will report on me to the GSO. I am not happy here."<sup>59</sup>

Municipalities in Mount Lebanon expressed distrust of individuals who do not maintain legal stay. There is an assumption that those who have limited legal status, or who entered through unofficial border crossings, are associated with armed groups. During in-depth interviews, municipalities reported that they require refugees to maintain their legal stay as a precautionary security measure. Municipalities either report those with limited legal status to the ISF or the GSO or, in some cases, evict them from the area.

54 Focus Group Discussion, 30 October 2014, Palestinian Refugee Men coming from Syria, Burj al-Barajneh.

55 The majority of women refugees interviewed with limited legal status were not working or seeking to work.

56 Women with limited legal status are not included in these figures because the majority of those interviewed were not working or seeking to work.

57 Focus Group Discussion, 12 November 2014, Syrian Refugee Women, Sad El Bouchrieh.

58 In-depth Interview, 14 November 2014, Syrian Refugee with limited legal status due to unofficial entry, Burj Hammoud.

59 In-depth Interview, 14 November 2014, Syrian Refugee with limited legal status due to unofficial entry, Burj Hammoud.

As one interviewed municipality employee expressed, “Why would a person leave Syria without any documentation, IDs or enter Lebanon through unofficial borders if he/she did not do anything wrong? They cannot stay in our Municipality area, it is a matter of security.”<sup>60</sup>

Refugees reported that limited legal status renders them less able to integrate with the Lebanese host community “If they discover that we do not have legal stay, they would treat us even worse. Either way they treat us badly.”<sup>61</sup>

There is a lack of understanding, from both the host community and local authorities, regarding the legitimate reasons underlying some refugees’ entry to Lebanon through unofficial border crossings, and the difficulties that refugees face in maintaining their legal stay. As one *Mukhtar* told NRC, “Those who have entered illegally have no argument – why didn’t they enter legally?”<sup>62</sup>

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60 Key Informant Interview, 6 November 2014, Municipality in Mount Lebanon.

61 Focus Group Discussion, 11 November 2014, Syrian Refugee women, Sad El Bouchrieh.

62 Key Informant Interview, 6 November 2014, *Mukhtar* in Mount Lebanon.

## 6. CONCLUSION

Although the data for this assessment was collected between September and December 2014, the findings, in conjunction with previous reports and protection monitoring, remain extremely significant. As the protection situation for refugees in Lebanon continues to evolve, monitoring the effects of limited legal status, trying to maintain legal stay and the daily consequences on refugees from Syria is critical. As the assessment has found, the context in Beirut and Mount Lebanon is different to that in other areas in Lebanon. Refugees have prioritised maintaining valid legal stay and have achieved this through a number of coping mechanisms, including those that had negative ramifications for themselves and their families.

The assessment confirms the previously identified consequences of having limited legal status including: lack of freedom of movement and the associated risks; lack of access to basic services; lack of access to livelihoods; and, difficulties with the host community. The validation exercise with protection actors in Beirut and Mount Lebanon unanimously confirmed these findings. These consequences are often interlinked and lead to refugees facing challenges in their everyday lives while also restricting their ability to cope with those challenges.

Reductions in humanitarian assistance, increasingly restrictive regulations for maintaining valid legal stay and accessing livelihood opportunities, and limited shelter support all combine to create a significantly reduced protection space for refugees. This concerning reality means that refugees, left with few choices, are likely to increase reliance on negative coping mechanisms. Documenting, understanding and highlighting the consequences faced by refugee families in these circumstances is of ever more importance, in order to formulate an appropriate response which ensures strong access to protection and assistance for refugees in accordance with international humanitarian and legal principles.

