Evaluation Service Evaluation of UNHCR’s Emergency Response to the influx of Syrian Refugees into Turkey January 2014-June 2015 Full Report ES/2016/03 Commissioned by UNHCR Evaluation Service Conducted by Universalia

6 FULL REPORT UNHCR’s operating context in Turkey Turkey is not a Delivering as One country for the United Nations system, there is no Humanitarian Coordinator, and the UN Country Team is led by a UN Resident Coordinator. Turkey has ratified the 1951 U.N. Convention on the Status of Refugees but maintained the geographic limitation. Importantly, Turkey is the only significant UNHCR operation which is not covered by a host country agreement – creating difficulties for the office and in particular for import clearances and duty-free status of purchases. At the beginning of 2011, on the eve of the Syrian crisis, UNHCR’s Turkey operation had a total of 5 international staff nationwide, and was entirely focused on registration, refugee status determination and resettlement of a relatively small caseload of 17,000 non-Syrians. From there, the operation grew dramatically in programming and staffing (figures below combine Syrian and non-Syrian programmes). Figure 1.4 UNHCR's staff and expenditures increased substantially as the Syrian crisis evolved16 Growth in expenditures and staff $120,000,000 400 350 $100,000,000 300 $80,000,000 250 $60,000,000 200 150 $40,000,000 100 $20,000,000 50 $0 0 2010 2011 2012 2013 2014 Pillar 1 expenditures Staff Not only did the operation grow in size, but it grew in complexity as the assistance and legal context for the Syrians introduced the new dimensions of camps, material assistance in the form of core relief items (CRIs), education services, cash/e-vouchers, support for a Government-managed registration system and initial support for livelihoods, none of which the UNHCR Turkey office was initially equipped for. At the same time, the number of non-Syrian refugees has also grown dramatically, placing huge pressures on UNHCR’s pre-existing registration and refugee status determination machinery. And finally, in addition to these two rapidly-growing and rapidly-changing Syrian and non-Syrian operations, two entirely new dimensions of programming were added in 2014 and 2015: the addition of a substantial cross-border operation into Syria (under UN Security Council Resolutions 2165 (2014) and 2191 (2015)), and the Special Mediterranean Initiative (with its own appeal and programme starting in 2015).17 16 Source: UNHCR Global Reports 17 As of late 2015 UNHCR’s Turkey operation is covered by five different appeals: the 3RP for Syrians, the Iraq Situation appeal, the Special Mediterranean Initiative, the Supplementary Resettlement Appeal, and the Global Appeal– and to further add to the complexity the UNHCR office in Turkey is co-managed by two HQ Bureaux: Europe Bureau for the non-Syrians and for the Mediterranean movement, and MENA Bureau (based in Amman) for the Syrian, Iraqi and cross-border operations.

FULL REPORT 7 Although these other situations are beyond the scope of this evaluation, they are still part of the complex operating environment of the UNHCR office in Turkey, and they have a profound impact upon Turkey’s relations with donors and UN agencies including UNHCR itself, where a different HQs Bureau is responsible for the European dimensions. In particular, late in 2015 (and beyond the evaluation period) the European Union announced a €3 billion programme of support for Syrian refugees in Turkey that dwarfs all previous financial pledges and fundamentally changes the refugee assistance landscape going forward. The final contextual point to note is that the sudden increase in global attention to Turkey (especially in 2015) has placed upon the operation an extraordinary burden of visit management, as senior UN and donor country officials have intensified the level, frequency and expectations of their visits to Turkey – to the point where the time spent on briefing and accompanying dignitaries limits senior management time available for actually handling the heavy and complex management tasks at hand. Table 1.1 From civil unrest to civil war, the Syrian refugee presence in Turkey has radically changed the humanitarian response of the Turkish government - and UNHCR's role and operations 2011– 2013 2014 – 2015 SITUATION (the demarcation between years is approximate to show contrast) Syria situation is seen as Civil unrest Civil war Government response is Responsive Anticipatory Government planning assumptions are Short term, then return Protracted Presumed durable solution is Voluntary return Return and resettlement Government stance is Syrians are guests Temporary Protection Syrian border is Open and loosely managed More and more strictly managed Legal regime for Syrians Syrian received as "guests" LFIP and TPR Government coordination by Deputy Prime Minister/AFAD DGMM and Prime Minister’s Office Government management model is Mostly in camps Mostly out of camps UNHCR/DONOR ROLES Donor stance is Disinterested Preoccupied with European movements Assistance mostly by Government and NNGOs Government, UN, INGOs, NNGOs UNHCR role mainly as Trusted external adviser Strategic partner UNHCR management model is Centralised in Ankara Shared with Gaziantep and Istanbul UNHCR staff focused on Non-Syrian RSD/resettlement Building a new Syrian programme Protection approach is Case management and camps Camps and Community-based Assistance approach is CRIs and in-kind Conversion to cash and e-vouchers Situation planning framework is RRP (UNHCR managed) RRP to 3RP (UNHCR and UNDP)

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

FULL REPORT 9 Figure 1.5 Timeline of the Syrian refugee crisis in Turkey

10 FULL REPORT 2 Methodology The evaluation has been guided by OECD-DAC Evaluation Quality Standards for Development Evaluation,18 the UNEG Norms and Standards for Evaluation in the UN System,19 as well as the Code of Conduct for Evaluation in the UN System.20The overall approach to the evaluation has been utilization-focused and followed a participatory and mixed-methods approach with the objectives of both assessing the performance of UNHCR’s response and providing learning for key stakeholders to use for strategic decision-making and the design of future interventions. In assessing performance, the evaluation considered inputs and outputs as well as processes throughout the design, planning and implementing stages of UNHCR’s interventions. External factors were also considered as they particularly influenced observed results (i.e. the movement trends, the evolution of Government policies and initiatives, the activities of other actors, the level of funding received as compared to the needs posed by the emergency). 2.1 General approach The following approaches have characterised the evaluation: Utilization-focused approach. During the inception phase, in Geneva as in Turkey, the team worked closely with PDES and with the Reference Group to finalize the methodology and work plan. During the data collection phase, the team continued to engage with UNHCR Turkey and PDES to review progress at important points, above all to ensure that the team arrives at useful, feasible and actionable recommendations. This approach did not decrease the evaluation’s impartiality and independence, as the evaluation team remained in control of the content of the evaluation report while ensuring the consideration of end user perspectives. Mixed-methods approach. The purpose of a mixed-methods approach is to triangulate sources of information and perspectives -- drawing on quantitative and qualitative techniques in order to ensure a comprehensive, robust, and evidence-based understanding of the programme under evaluation, which in turn allows for the development of insightful findings, reliable conclusions, relevant lessons learned, and targeted recommendations. Since the beginning of its evaluation, the evaluation team has used a range of quantitative and qualitative data collection and data analysis methods. These included: (a) document review; (b) in-person key informant interviews; (c)an online survey; (d) field visits including observation and beneficiary dialogues (whenever possible and realistic); and (e) database and financial analysis. Participatory approach. With the support of UNHCR, Universalia actively engaged with UNHCR senior managers (in Geneva as well as throughout Turkey), field staff, donors, partners and key government partners throughout the data collection phase. In all instances, on an individual or a group basis, the team 18http://www.oecd.org/development/evaluation/qualitystandards.pdf 19http://www.uneval.org/document/detail/21 and http://www.uneval.org/document/detail/22 20http://www.uneval.org/document/detail/102 and http://www.unevaluation.org/document/detail/100

FULL REPORT 11 encouraged interlocutors to share their points of view and experience in confidence. It is important to note that the evaluation team had very limited direct access to refugees, and was not able to gather methodologically sufficient data from the Syrians themselves. Gender focused approach. The evaluation assessed the extent to which the development of policies and programmes in support of Syrian refugees integrated gender equality. 2.2 Data collection Document review Cooperation from the UNHCR country team and other stakeholders has been outstanding in regard to document collection, all the more valuable since the field visits were taking place at the same time as basic documents were being provided and time was of the essence. Documentation included internal notes and field reports, and enabled the evaluation team to draw hypotheses to guide the evaluation, as well as to triangulate information gathered through interviews, group discussions and field observation. Online Survey After consultation and integration of comments and suggestions for revision from UNHCR, an online survey was sent to three categories of stakeholders: UNHCR Turkey current and past personnel; National/International NGOs; and UN agencies in Turkey. A Turkish version of the Survey was developed and sent to a selected range of officials from DGMM, AFAD and other interested officials of other organizations partnering with UNHCR. UNHCR Ankara then briefed Turkish officials and partners on the rationale for the proposed survey. The initial intention for the survey was to gather meaningful data from a broad spectrum of stakeholders before commencing the field mission in Turkey. Administering a survey (and document review) before data collection in the field saves precious time as the team can then use field time to focus on triangulating and validating hypotheses and preliminary findings. For logistical and technical reasons, this could not be done and much of the documentary and survey data was analysed after the field visits. The survey was open for six weeks. It yielded a disappointing response rate, although not altogether surprising given the operating environment of Turkey, where some relationships are very sensitive and all stakeholders are cautious in their observations. The response rates from UNHCR HQs, UNHCR Amman and from the Turkish stakeholders were insignificant. The UNHCR staff and I/NGO responses were useful, in particular the narrative comments provided depth that complemented the key informant interviews. Results of the Survey are presented in Appendix IV.

12 FULL REPORT Stakeholder Mapping and Interviews With the support of UNHCR Turkey, the evaluation team mapped the main stakeholders (see a summary in Appendix III). Stakeholders were interviewed in four rounds. The first took place during the inception mission in Geneva and allowed the team to meet all the relevant senior management (including the former UNHCR Representative in Turkey), many key officers and analysts, other UN agencies, and the Reference Group. These initial sessions were vital to confirm the context of the evaluation and to plan the fieldwork. The second round of interviews took place during the second stage of inception in Ankara, Gaziantep and Istanbul, when the evaluation team was introduced to key stakeholders and thereby could begin developing hypotheses for testing, and to fine tune the evaluation approach. The third round took place during the data collection mission where Universalia's team divided into sub- teams, and conducted in person or small group interviews with all key stakeholders across the country. A fourth and final round of interviews were conducted by phone from Canada after the field mission, during the data analysis and report drafting stage. A standard interview protocol (Appendix VI) helped the team conduct interviews and collect this essential data in a systematic manner. Field visits in camps and non-camp settings Despite the operational pressures of the moment, and in particular the prospect of a large-scale influx of new arrivals in the south and a heightened degree of sensitivity regarding onward movement to Europe, UNHCR staff and partners were most accommodating and facilitated a very smooth series of field visits and meetings in six cities: Ankara, Istanbul, Gaziantep, Hatay, Bursa and Konya - the last two being cities without a UNHCR or significant IP presence (visited in order to assess protection and assistance in control situations where UNHCR has no presence). The only (but serious) limitation in terms of access was that the evaluation team had access to only one of the 26 Syrian refugee camps managed by AFAD and its implementing partner TRC. The complete list of persons and institutions met during the evaluation is presented in Appendix VI. Focus Groups The evaluation team sincerely hoped to be able to organise focus group discussions (FGDs) with refugees in camps and out of camps, but in the end was no able to do so, and even the one camp visit did not permit an open discussion. The team did meet with small groups of refugees in an unstructured way, mainly while visiting community centres, but not in a way that was methodologically sufficient. Instead, the evaluation team has relied on secondary data, particularly reports of focus group discussions carried out by partners. UNHCR's periodic Age Gender and Diversity Mainstreaming (AGDM) Participatory Assessments21 were an invaluable source of information, in particular on protection issues. 21 See section below on AGDMs

FULL REPORT 13 Evaluation Matrix. The Evaluation Matrix was based upon the terms of reference, and then modified through three iterations: the technical proposal, discussions with UNHCR HQs during the first inception phase in Geneva, and then the final inception phase in Turkey, which also took into consideration comments from the Reference Group. The Final Evaluation matrix, presented in Appendix II, has been updated to reflect these changes. Presentation of evaluation results The first deliverable, presented to UNHCR on 12 February, was the Inception Report. No significant changes were requested by PDES and UNHCR Ankara, and the evaluation team immediately began data collection. At the end of the data collection phase, the team presented preliminary findings to UNHCR Turkey on 4 March, and separately to UNHCR MENA Bureau, in a presentation following the format approved in the Inception Report and following the evaluation questions: Coordination, Efficiency, Coverage, Appropriateness, Impact and Sustainability, and a review of thematic findings in Protection, Education, Community Empowerment and Core Relief Items. Valuable feedback from UNHCR allowed better understanding of several aspects, and suggested further channels of follow-up over the ensuing weeks. The draft of the Final Report was presented to UNHCR in the week of 15 April 2016. After a round of comments from UNHCR and the Reference Group, the evaluation team was requested to revise the report by moving away from the organising principle of the ten evaluation questions, and instead focusing on five key areas: Strategic Positioning, Protection, Education, Social Cohesion, and Programming. Limitations to the evaluation The online survey yielded some useful data but had a disappointingly low response rate, and the team was not able to conduct focus group discussions with refugees. This lack of primary data was compensated by secondary data and a greater emphasis on key informant interviews. Finally, the team faced the challenges of considering a historical period 1 January 2014 – 30 June 2015 when many of the key people from that period were no longer available for interview, and everyone’s attention was focussed upon the immediate issues of February 2016 - in particular the mixed onward or secondary movements to Europe and the Turkey-EU agreement that were outside the scope of the evaluation. The evaluation team has attempted to take the changed context into account in order to provide recommendations drawn from 2014-2015 that are useful to the programme in 2016-2017.

14 FULL REPORT Evaluation team and acknowledgements The evaluation team consisted of Ayse Sule Caglar, Yvan Conoir (Team Leader), Julian Murray, Virginia Thomas, and Nurper Ulkuer, supported by Esther Rouleau in Canada and Ebru Karayigit in Turkey. The team wishes to thank UNHCR for its exceptional support throughout, in particular Pascale Moreau and Alev Orsel Karaca in Ankara, Tracey Buckenmeyer in Gaziantep, Selen Elif Ay in Istanbul, and Machiel Salomons in Geneva.

FULL REPORT 15 3 Strategic Positioning Coordination Finding 1. UNHCR’s relationship with the Government evolved as the coordination roles of the Office of the Prime Minister, DGMM and AFAD changed over time From its outset in April 2011, coordination of the Syrian refugee response in Turkey has been confidently managed by the Government of Turkey. As explained in greater detail in the Context Chapter above, over the five years of this emergency the Government’s institutional configuration and its coordination mechanisms evolved considerably and in ways that were not always clear to stakeholders, including UNHCR. Initially the Government declined offers of assistance from UNHCR and other stakeholders, and the Government was not substantively involved in the Turkey chapters of the UNHCR-managed Regional Response Plans (RRP) issued from March 2012 onwards. Only in 2015, in the context of the 2016-2017 3RP, did the Government provide written comments and inputs on the UN strategy.22 Unlike in the other RRP/3RP countries, international NGOs are not part of the Turkey chapter of the UN regional appeals.23 The most important obstacle to effective coordination in this context of strong Government leadership is that, during the period under review, the Government itself did not provide a single clear articulated strategy to guide everyone’s actions, and furthermore did not provide basic information on the population to international stakeholders. Instead, for reasons of evolving context and institutions outlined in “This is a difficult country to help” the Context Chapter above, the Government made requests to the donors, UN agencies and INGOs depending on the priorities and needs – Donor representative of the day, to which the external stakeholders responded as best they could, given their prevailing constraints and available resources.24 Three loosely connected communities of coordination Finding 2. There are three distinct communities of coordination in Turkey, each with its own “coordination culture” Although the Government is now much more open to work with donors, UN agencies and INGOs, the period prior to the emergency influx was characterised by different stakeholders mainly organising 22Interview with UNHCR staff 23 Initially there were few international NGOs operating in Turkey, and the Government started registering large numbers of INGOs to work in Turkey from 2014 onwards. In 2015, a handful of INGOs supporting Food Security were included in the appeal for the first time, as a group 24Several interlocutors, in particular donors, observed the delicacy of a situation where the Government was proud of the assistance it was providing and not asking for help, at the same time as they bemoaned the lack of burden- sharing and the limited international contributions

16 FULL REPORT themselves. This set the stage for a situation that continues today, consisting of three loosely connected communities of coordination: (a) a Government mechanism that has itself evolved over the five year period,25 and where the Government primarily coordinates its own substantial programmes, involving some NNGOs but only occasionally UNHCR;26(b) a UN system that coordinates UN agencies and IOM; and (c) various donor-driven and occasionally INGO-driven mechanisms to coordinate between organisations working with a particular donor or in a particular sector.27 In addition, there are several sector-specific working groups, some at national level and some at local level, some organised by Government, others chaired by UNHCR or by other lead agencies, and some organised around issues (for example harmonising the services offered by community centres). To a large extent, these three communities of coordination reflect the three main sources of funding for the Syrian emergency: Turkish Government funding (both national and local), donor funding through UN channels and notably the RRP6 and 3RP, and donor/private funding that flows directly to NNGOs and INGOs outside the Government and UN framework (including substantial EU and US Government funding). They also reflect three distinct “coordination cultures” that do not comfortably work together: a Government culture which follows official hierarchy and functions through regulations and directives; a UN culture which relies on a division of labour among similar agencies to build composite planning and reporting frameworks; and a donor culture which is characterised by portfolios of geographic or sectoral projects proposed and managed by implementing agencies. These three coordinating communities co- exist, and between them there do not appear to be major gaps, but in the absence of single overarching coordinating and priority-setting mechanism there are almost certainly inefficiencies and missed opportunities. Recommendation 1. UNHCR Turkey should work with the Turkish Government to revise the overall coordination architecture at national, provincial and municipal levels, in order to optimize the effectiveness, efficiency and coherence of the Syrian refugee response Coordination within the UN system Finding 3. The UN Resident Coordinator and the UNHCR Representative disagree on who should coordinate UN agencies supporting Syrian refugees in Turkey Within this coordination universe, the coordination mechanisms prevailing between UN agencies in the period under review were not tidy. Underlying this untidiness is that there was and still is no clear agreement between the UN Resident Coordinator and the UNHCR Representative regarding who has overall coordination responsibility for UN agencies supporting refugees in Turkey, and in particular for representing the UN to the Government of Turkey on refugee matters. Both the Resident Coordinator and the UNHCR Representative have well-justified arguments in favour of their overall responsibility: the 25 Since 2015 this is led by the Chief Advisor to the Prime Minister for Immigration and Humanitarian Aid 26 At the moment, this report was being drafted, after the end of the period under evaluation, the recently-created Office of the Chief Advisor to the Prime Minister was proposing a welcome new mechanism to coordinate a higher level of Government engagement with the 3RP and organised around the main 3RP sectors and agencies 27 Note that most of the INGOs working with UNHCR entered the country in 2013 and 2014, and the majority set up their national offices in the field – even today very few have Ankara offices

FULL REPORT 17 Resident Coordinator holds that he is the senior representative of the UN to the Government of Turkey and responsible for coordinating all UN agencies in country under the mandate of the Resident Coordinator system.28 To exercise this responsibility, in 2013 the Resident Coordinator set up the “Syria Response Group” chaired by himself, and made up of the Heads of Agency of those UN agencies supporting Syrian refugees in Turkey as well as cross-border operations from Turkey into Syria.29 The UNHCR Representative has her own set of responsibilities stemming from UNHCR’s “Statute [which] places the High Commissioner and his Office at the centre of the international refugee response system, including in respect of coordination functions.”30 While continuing to participate as a full member of the UNCT as well as in the Syria Response Group (which now meets less frequently), from 2011–2014 UNHCR Ankara chaired the UN Task Force on Syria, a working-level body within the RRP framework and which managed practical/technical coordination between agencies in country. The respective coordinating roles of the UNHCR Representative and the UN Resident Coordinator were somewhat clearer in the period 2012-2014, when the overall UN response for Syrians outside Syria was managed through the Regional Response Plans 1-6, all of which were coordinated unilaterally by UNHCR. However, since 2015 and the transition from the RRP (Regional Response Plan) to the 3RP (Regional Refugee and Resilience Plan), the emphasis on the resilience dimension has resulted in a transition to co- chairing of the Syria Task Force between UNHCR and UNDP. Finding 4. UNHCR was more effective at coordinating with UN partners than with Government or NGO partners Thus, it is that as of January 2015, there was a somewhat confusing UN coordination architecture consisting of (a) a Heads of Agency Syria Response Group (SRG) chaired by the RC, which meets irregularly depending on the needs of the evolving situation, and (b) a working-level UN Task Force on Syria co- chaired by UNHCR and UNDP, and which operates as if it were a technical committee of the SRG to the extent that its strategic decisions regarding the 3RP are referred to the SRG. Despite the shortcoming of being limited to UN agencies, the parties involved feel that the Ankara-level mechanisms are somewhat effective. They provide the basis for regular information exchange and coordinate the processes of preparing and reporting on the Turkey chapter of the 3RP, but they fall short of making difficult substantive decisions such as, for example, which sectors and agencies should be de-prioritised in the event that full 3RP financing is not available, or how to allocate un-earmarked resources provided to the 3RP. Regarding the coordination spectrum described in Table 3.1 below, the Ankara-level mechanisms are somewhere between “coordinated” and “partly harmonised”. Finding 5. In RRP6, each agency’s submission was internally coherent but there was no mechanism obliging agencies to be horizontally coherent The RRP6 and 3RP are generally regarded as necessary for providing a common narrative for the UN response and for providing to donors a sense of confidence that there is a credible, coherent coordinated 28The Resident Coordinator function for humanitarian coordination is described (https://undg.org/wp- content/uploads/2015/01/APPROVED-RC-Job-Descriptions\_Feb\_2014.pdf) and is silent on refugee responsibilities 29 Operations in Syria, including cross-border activities from Turkey, are coordinated by the Humanitarian Coordinator in Damascus 30UN High Commissioner for Refugees (UNHCR), Note on the Mandate of the High Commissioner for Refugees and his Office, October 2013, available at: http://www.refworld.org/docid/5268c9474.html [accessed 22 March 2016]

18 FULL REPORT plan for Syrians in Turkey. The RRP6 (which was UNHCR-led) was built up as a composite of all the UN agency appeals, packaged under a single framework and with some common metrics. Each agency reported on its results, and these were aggregated into the final report. From a coordination perspective, what is important is that the agency-based design principle presented few requirements for agencies to negotiate, to compromise and to adjust their plans in relation to others working alongside them in the same sectors. Finding 6. In 3RP, the quality of coordination is better but the resistance and frustration with coordination is also higher With the changeover to the 3RP methodology, several important changes were introduced. Firstly, the universe was divided into sectors each containing multiple agencies, then each sector met as a group to agree on the goals and objectives of the sector, after which each agency then went away and determined what would be its contribution to the mutually-agreed sectoral goals. This sectoral method of planning was significantly heavier and more stressful – the stress being the healthy consequence of coordination effort forcing parties to agree on a supra-Agency set of goals, and then to coordinate their activities within that frame. This is clearly a step forward in terms of coordination quality, and the 3RP is a stronger plan. But at the same time, the 3RP has now created a greater coordination burden during implementation and reporting, as agencies which hitherto could submit their “chapter” and then quietly implement their agency plan for the rest of the year must now meet more frequently to synchronise their activities, and to report against common goals. The second major change between RRP6 and 3RP is the bifurcation of the 3RP between “refugee” and “resilience” components, and leaving the coordination of these components in the hands of UNHCR and UNDP respectively. Since the two components are quite different in their orientation, time horizons and partner composition, the coordination between these components creates a second layer of complexity. The quality of the interagency (RRP6 and 3RP) and internal (COP) planning processes will be discussed in a later chapter on programming. Here, we will address RRP6 and the 3RP from a coordination perspective, and comment on three specific interagency coordination matters: UNHCR and UNICEF in education; UNHCR and WFP on cash; and UNHCR and UNDP on livelihoods and resilience. Thematic coordination issues Finding 7. UNHCR and UNICEF have improved coordination on education but are not implementing the same strategy Regarding UNHCR and UNICEF coordination, during the evaluation period there was a marked difference in education philosophy between the two institutions, clearly observed also in the UNICEF evaluation of their own Turkey programme,31 which reduced the effectiveness of both organisations for a time. These differences are discussed in further detail in the later Education Chapter, and have since been partly resolved by an agreed division of labour between UNHCR and UNICEF. While the division of labour resolves the problems of practical coordination between the agencies, the challenges of actually 31Independent evaluation of UNICEF’s response to the Syrian refugee crisis in Turkey 2012-2015; November 2015 p. 44-45

FULL REPORT 19 reconciling the two different approaches to the education of Syrian refugee children remains a major piece of unfinished business. Finding 8. For cash and e-vouchers, there is no unified coordination mechanism that includes governmental, international and non-governmental organizations Coordination between the various agencies on cash and e-vouchers has become more complex over 2014- 2015 as more agencies have entered into this field, using funding from inside and outside the 3RP, using cash for different purposes,32 applying different assessment criteria and package sizes, and including major contributions by Turkish authorities, the TRC and charitable NNGOs. As of the end of 2015 the field was crowded, harmonisation of approaches was making steady but slow progress under WFP and INGO leadership, and the amounts of funding through cash-based interventions seemed destined to increase as the effectiveness of cash is established and substantial new non-3RP funding is made available, in particular by European donors. In this environment, where funding is increasingly outside the 3RP, involving Turkish partners and, increasingly, Turkish government bodies responsible for including refugees in the Government’s cash-based social protection schemes, UNHCR needs to consider what its comparative advantage may be in relation to other agencies who are candidates for coordination. For cash and e-voucher coordination, UNHCR should work towards a unified coordination mechanism, including all related governmental, international and non-governmental organizations. Finding 9. Despite widespread agreement that it is a priority, livelihoods has problems of coordination, funding and implementation Finally, livelihoods is a sector where there was very little UNHCR programme investment in 2014-2015 beyond limited life skills training in community centres. Instead, UNHCR’s efforts were correctly focused on encouraging reform of legislation such that persons under temporary protection would have access to the labour market and Turkish language training. UNHCR should continue with the recent agreement that UNDP, supported by ILO, UNIDO, FAO, UNHCR and others, is best placed to coordinate as well as to lead the design and implementation of programmes providing Syrian refugees with access to the Turkish labour market and sustainable livelihood opportunities. Now that the RRP6 has transformed into the 3RP and has a clearer focus on employment and livelihoods for Syrians in Turkey, a dimension of assistance that is the comparative advantage of development-oriented UN partners with ties to Turkish domestic departments and to the Turkish private sector, UNHCR should re-position itself with respect to the livelihoods sector. Preferably, UNHCR can maintain its emphasis on the enabling environment for refugee livelihoods by focussing on upstream issues such as refugee registration; including skills profiling, refugee labour mobility, Turkish language training, increasing access to vocational training, and maintaining a positive protection space through advocacy and communications, such that Syrians are economically welcomed by Turkish enterprises and citizens. Recommendation 2. UNHCR Turkey should reassess its thematic coordination roles, particularly in education, cash and livelihoods, and be ready to share or step back where other actors have strong capacity and/or mandates to lead 32 For example, “cash for food” vs “cash for CRIs” vs “conditional cash transfers for education”

20 FULL REPORT Coordination with donors Finding 10. Donors are not satisfied with the briefings from UNHCR Turkey Donor coordination is not easy in this context. For the first few years, most donors did not direct their Syria funding towards Turkey for three main reasons: (a) Turkey is a developed country, a G20 member and aspiring member of the EU; (b) Syrian refugees in Turkey were not perceived to be threatening the economic and political stability of the host country (in comparison with Jordan and Lebanon); and (c) the Government of Turkey was providing a generous and effective response with its own resources, and not asking for international assistance. Additionally, most donor embassies did not have dedicated aid professionals in their Ankara embassies,33 but instead in Amman at the coordination hub for the region, and those few who had humanitarian officers in country tended to place them in the Southern provinces closer to the action and especially closer to the cross-border operations. This all changed dramatically in 2014-2015 as Turkey suddenly moved to the centre of donor attention due to the continued massive influx of Syrian refugees - highlighted by spectacular arrival events at Kobane and Akçakale, the start of cross-border operations, and above all the increase in mixed onward and secondary movement to Europe. Currently, donor interest is at an all-time high in Turkey, and most donors expressed to the evaluation team that they are not getting the sort of briefings that they want from UNHCR.34 What most donors are asking for is detailed information on trends in the movements of Syrian refugees - information on the push and pull factors - and are only secondarily interested in the situation of refugees in-country or in their assistance and protection needs. So, it is complicated. Donors are hoping that UNHCR can give them real time information, which is very sensitive and which may not be available. In the final analysis, the evaluation team concluded that it is not UNHCR’s primary role to provide migration intelligence to donor embassies, but rather that UNHCR should continue to focus on briefing donors on the protection and assistance trends and needs within Turkey – a subject about which there is much more to say since the Government is now providing more information and has opened up to receiving donor funding. But UNHCR should provide these donor briefings in a way that is more structured, more substantive, more systematic, and better supported with data and graphics of a nature that donors can retransmit back to their capitals. Donor briefings should not mainly be about appealing for funding or even resettlement quotas, but rather should be seen as the key opportunity to frame the way that western governments see the refugee crisis in Turkey, and they are an important means to harmonise advocacy with the Government. Coordination in Istanbul and Gaziantep At the sub-national level, the coordination mechanisms are very different between Gaziantep and Istanbul, reflecting the very different histories and operating contexts of the two offices. The Istanbul office is small and well-established, in a city with no significant donor, UN agency or INGO presence, and in a region without camps. In contrast, the Gaziantep office is new and fast-growing, in a dynamic border environment with camps, large out-of-camp populations and cross-border operations; with a substantial presence of UN agencies, INGOs and some donors; and with a concurrent OCHA-coordinated cluster system for the cross-border operations. 33 The notable exception is the EU, which has a major aid delegation in Ankara that is tied to EU accession assistance 34 Five major donors were interviewed

FULL REPORT 21 Finding 11. Coordination was more effective in Istanbul and less effective in Gaziantep In Istanbul, the approach taken to coordination can be characterised as “coordination through training”. Given that the Istanbul office was well-established and maintains strong relationships with Government and local NGOs (rooted in the prior support to non-Syrians), and since there are relatively few actors in Istanbul and most of them are Turkish, the Istanbul office has focused intensively on awareness-raising and training of stakeholders in the legal and procedural aspects of support to Syrians. By defining the standards and clarifying the regulatory context, and then training municipal authorities, security agencies, lawyers and local NGOs to meet those standards, the office has effectively pulled stakeholders to a higher level of shared understanding. There are no sectoral working groups, but instead there are quarterly meetings where senior staff from Ankara visit Istanbul and meet with all stakeholders, periodic interagency meetings primarily for briefing, supplemented by time-limited working groups on specific issues that clearly require coordination during their formative stages (for example agreeing on standards for legal certification of lawyers representing refugees, or since 2015, developing a common approach to Istanbul-area Community centres). In sum, the “Istanbul model” is light and practical, and centred around developing capacity to meet agreed standards. Stakeholders widely consider Istanbul coordination to be good. This contrasts with the much more complex and fast-changing situation in Gaziantep. In the early days of the response, AFAD “UNHCR needs to develop country specific firmly coordinated assistance in camps in the Southeastern SOPs and guidelines on each sector where NGOs operate in Turkey. Coordination region. UNHCR’s assistance was not requested, and there was should be taken up to the next level where little recognition of the growing out-of-camp population. the NGOs should be included in the problem Accordingly, throughout 2012 UNHCR’s presence in Gaziantep solving and advocacy initiative alongside of was temporary and limited to protection monitoring of the UNHCR. Information sharing through camps and observation of voluntary repatriation. In November UNHCR should be taken more seriously and 2012, the creation of the Gaziantep office was approved.35 implemented immediately. UNHCR should Throughout 2013 the office was headed by three different be more due diligent with information officers on a temporary basis,36it did not have a bank account or sharing and keep the data updated”– a separate cost centre within UNHCR’s financial system, and did comment from an NGO partner not have programming responsibilities other than to monitor the distribution of the assistance to camps that started in 2013. Only in the first days of 2014 was a permanent Head of Office appointed, and immediately thereafter a more conventional coordinating machinery was put in place, although even into 2014 programming responsibility for the Southeastern region remained centralised in Ankara37 – placing the field office at a considerable disadvantage with regard to partner coordination in the region. In 2014 a series of sectoral working groups were formed, but even these were not without their challenges as (a) first and foremost, the Government is clear that it is coordinating refugee response – leaving considerable ambiguity about the extent and boundaries within which UNHCR coordination is appropriate or welcome; (b) the Government administration is highly centralised and therefore local coordination with Government was inconsistent; and finally (c) there were significant crossovers with the rapid growth in the cross-border coordination system – usually involving the same agencies and often even the same 35Letter of Observation on the visit of the Board of Auditors to UNHCR operations in Turkey: February 2014 36 Concerns about lack of management continuity and delayed staffing were raised in the Board of Auditors report, Ibid 37 UNHCR staff interviews reported that the field did not have copies of the IP agreements until Spring 2014

22 FULL REPORT people, but coordinated by OCHA using the conventional cluster structure. As a result of this rapidly- evolving situation, confused institutional environment and unclear alignment of mandates, the Gaziantep- level coordination structures struggled to gain focus and sustain momentum, and despite the best efforts of UNHCR staff the consensus of the Gaziantep-based stakeholders is that coordination was and remains weak. On the spectrum of coordination depicted in Table 3.1 below, Gaziantep coordination is seen as somewhere between “co-existence” and “division of labour”. Five types of concerns were expressed by stakeholders: (a) UNHCR-coordinated mechanisms are not connected to the Government-coordinated mechanisms (this is a local-level manifestation of the different “coordination cultures” mentioned earlier), so sometimes stakeholders get different or only partial information; (b) there are too many coordinating forums with too little value-added; (c) UNHCR sometimes claims the mandate to lead a sector but does not have the experience and expertise to do this effectively – thus taking a coordinating seat that would be more effectively occupied by another organisation; (d) the 3Ws and 4Ws are not a fully-developed system; and (e) some working groups should move beyond information-sharing to joint problem-solving. Coordination should not be something that UNHCR managers do when they can find the time, and not all staff have the abilities and experience to act in a coordination capacity. The Turkey evaluation reveals that coordination is a professional skill that needs to become a corporate priority if UNHCR is to meet the leadership expectations placed upon it in large complex emergencies. If UNHCR were to accord greater priority to coordination, it could immediately put in place some practical measures at the global and local levels such as (a) making coordination abilities a selection parameter for senior staff; (b) making coordination training mandatory for staff who are expected to coordinate working groups or clusters at national and sub-national levels; (c) making coordination an explicit priority in job descriptions; (d) rating coordination performance in the annual staff performance review process; (e) creating/filling Information Management Officer positions promptly. Recommendation 3. UNHCR globally should increase investment in the professionalization of its coordination function

FULL REPORT 23 Table 3.1 Coordination is best seen as a spectrum from coexistence to unified programming SPECTRUM OF COORDINATION Coexistence Division of Labour Coordinated Partly Harmonised Fully harmonised Unified programme Information “Round the 3W/4W manually Periodic web- Real time web-based Real time web-based Real time web-based table” updates compiled based 3W/4W 3W/4W 3W/4W 3W/4W Analysis Separate Exchange of info on Separate analyses Agreement on Agreement on Agreement on analytical separate analyses planned together analytical priorities and analytical priorities priorities and single to cover gaps single analysis and single analysis analysis Needs Separate Each assesses Unified metrics so Unified metrics so Single joint needs Single joint needs Assessment needs in own separate datasets separate datasets are assessment assessment region or sector are comparable comparable and and shares and coverage coverage high high Standards and Separate Efforts at Agreed SOPs and Agreed SOPs and Agreed SOPs and Agreed SOPs and Procedures coherence but not standards standards standards standards no exceptions standard Advocacy Separate Separate Some joint Some joint advocacy Mostly joint advocacy Only joint advocacy advocacy messages messages messages messages Plans Separate Separate plans Separate plans Coordinated plan built Single plan based on Single joint plan that recognising based on a shared from agency plans needs not agency accepts to limit lower comparative set of goals and plans priority sectors and limit advantages objectives some agencies Implementation Separate Separate with more Separate but Separate, but with Consortium of Single agreement and info sharing some sharing of substantial sharing of agencies with consortium resources resources separate agreements implementation with single managing body Funding Separate Separate donor Some joint some Separate earmarked Unearmarked funding Pooled funding donor projects projects separate funding funding for single plan for single plan

24 FULL REPORT Internal Coordination within UNHCR Turkey Finding 12. Coordination within UNHCR Turkey needs improvement The evaluation team was not asked to undertake a management systems review, but did hear from a number of key staff both in Ankara and in the field about weak internal coordination, particularly in the period under review when ““The fact that UNHCR Turkey is reporting to the nature of the operation was in a dramatic transition and two bureaux, and managing three appeals the field offices were scaling up. We heard of problems in (3RP, Mediterranean, and Iraqi) made the communication between Ankara and field offices, and coordination within UNHCR less effective”– between sections in the same office. To some extent it is UNHCR staff member inevitable that there is confusion when most staff are newly- recruited or on short-term assignments, when roles are changing, and between a field which naturally tends to feel disempowered or neglected and a head office that is tackling strategic questions which the field does not always relate to. Nevertheless, we heard of enough instances of duplicated effort, urgent requests without response, and decisions being made without consultation, that we feel there is a need for UNHCR Turkey to update its arrangements of management meetings, reporting relationships and intra-office communications, so that the operation is fully coherent and better equipped to face the challenges ahead. In particular, we felt that UNHCR should consider: (a) involving Istanbul in periodic senior management meetings; and (b) rationalising (more systematic, more selective, more useful) the two-way flow of key management information between Ankara and field offices. Coordination where UNHCR has no presence Finding 13. The large number of refugees spread across urban and rural areas where UNHCR has no presence, suggests an approach centred on engagement with local authorities Approximately 1,000,000 Syrian refugees and up to 200,000 non-Syrians are living in cities and rural regions of Turkey outside the reach of a UNHCR sub-office. To reach out to this population, UNHCR has two main mechanisms: a proxy field presence through a network of small offices set up by UNHCR’s major national NGO partner ASAM, and a methodology for community-based protection set up in late 2015, in which multi-functional teams will cover Syrians and non-Syrians on an area-basis (rather than a population or an issue basis) through periodic field visits. These two mechanisms will need to include in their work programme a conscious effort to coordinate with “Considering the size of the population provincial and local governments – beyond just meeting with and the large area that this population is these authorities, ASAM and the roving multi-function teams dispersed throughout, outreach to should endeavour to facilitate and participate in periodic local- refugees living out of camps is both a level coordination meetings hosted by local government challenge and a priority”– UNHCR staff authorities and involving a range of local government member departments, NNGOs and local stakeholders. This should become a primary vehicle for UNHCR to gain a deeper understanding of

FULL REPORT 25 dynamics in these more remote populations of concern, to bring local stakeholders onto the same page regarding regulations and best practices, to provide training, and also to facilitate harmonisation of approaches. We could characterise this as a lighter more mobile variant of the Istanbul model. UNHCR management arrangements Human Resources management One of the curious features of the Turkey operation is that, despite hosting the largest refugee population in the world and being a key part of the largest L3 emergency in recent history, the Turkey response was never considered to be a full-blown emergency by either the UN system (there is for example no HC/HCT activation) or by UNHCR. This is for reasons outlined in the Context Chapter above, and notably the fact that the Government of Turkey did not initially request UNHCR assistance and, when it did, this was for specific elements of a non-emergency nature (for example Core Relief Items (CRIs) to supplement Government stocks, support for registration equipment and training, support for Turkish schools hosting Syrian children). Finding 14. The fast-track staffing mechanism worked as intended for Turkey Practically speaking, Turkey was handled as a slow-onset emergency, with a gradual adaptation of a prior programme to a different situation with new needs. The figure below clearly shows the transformation in staff composition from a non-Syrian RSD and Resettlement operation, over to one focused on protection and assistance for Syrians: mostly in the period under evaluation. Figure 3.1 UNHCR Human Resources response to the increase of Syrian refugees in Turkey Staffing Budget for Turkey 2012-2015 (USD) 18,000,000 16,000,000 14,000,000 12,000,000 10,000,000 8,000,000 6,000,000 4,000,000 2,000,000 0 2012 2013 2014 2015 Refugees and asylum seekers in urban areas (non-Syrians) Refugees and asylum seekers from Syria in Turkey

26 FULL REPORT Accordingly, even though Turkey was eligible for emergency38 and fast-track39 deployments as part of the greater Syria response, there were few requests made by the Turkey operation, especially few relative to other Syria response countries in the late 2012 - late 2013 timeframe, when Turkey was relatively quiet and the action was in Jordan and Lebanon. Altogether, between late 2012 and mid-2014, 20 international staff were assigned on fast-tracks: 15 to Ankara and 5 to Gaziantep (including some for the cross-border operation). With a couple of notable exceptions, including the critical positions of the Head of the Gaziantep Field Office and the Information Management Officer in Ankara, the deployments were made between 8-10 weeks after the advertisements were launched – a remarkable achievement and a validation that the fast-track process is generally working well for those who are requested, identified and assigned.40 However, an analysis of the staffing tables for the period under review also revealed that several critical positions were left vacant for considerable periods,41 and we conclude this is either because they were not requested by Ankara, and/or because they were requested but suitable candidates could not be identified, and/or because the staffing processes in the field were slow. Finding 15. National staff are a key success factor for the Turkey operation At the Ankara level we have concluded that one reason for the high level of local staff vacancies is that the key enabling functions of Administration and Human Resources were understaffed and slow to scale-up when the operation needed to rapidly recruit new national staff outside the traditional areas of refugee status determination and resettlement.42This was all the more serious, and became a significant bottleneck, because the Turkey operation relies heavily upon national general services staff and national officers. Indeed, the number and proportion of national officers in Turkey is among the highest in the world, and there is no doubt that this is both essential and key success factor for all UN agency operations in Turkey. From the table below (note this is a table of positions not staff - and many positions were vacant), it seems that the overall strategy was first to staff up national officer positions43 (more than doubled in 2014), then in a second phase to recruit national general services staff (also more than doubled between 2014 and 2015) as well as recruit more international staff (mostly for Gaziantep). This seems to 38 Temporary deployments, extended missions, usually 2 weeks – 3 months to fill a specific short-term gap or to deploy someone in advance of a permanent deployment expected to follow in a few months 39 Regular assignments where the processing is accelerated and out of the annual cycle, in response to a fast- changing high priority situation 40 The suggestion was made by national staff and by Turkish officials that UNHCR international staff – especially those on short assignments – should be given targeted orientation to Turkish bureaucratic culture in order to smooth over likely misunderstandings arising from the preconceived notions of globally-mobile international staff and the very specific systems and proud traditions of the Turkish government. It was also observed that Turkish officials highly value both education and specialisation, and that in cases where UNHCR international or national staff appear to be inexperienced or under-qualified, they have difficulty to be accepted by Turkish officials and partners 41 20% of all positions were vacant in January 2014 and 25% were vacant in July 2015 42 In January 2014, there was no international Admin and Finance Officer position, there was a vacant Admin and Finance NOD position, and the only staff handling HR were one NOA Assistant Admin and Finance Office and a G5 Senior HR Associate. The HR officer was staffed by January 2014, but then three different HR officers filled this position over the next 2 years 43 In addition to new positions and recruitment, the Turkey operation should be recognised for its ability to identify strong national staff and promote them from within, including important jumps from the GS to NO categories, and promotions within the NO category. There is no doubt this has provided essential continuity and performance

FULL REPORT 27 the evaluation team to have been the appropriate strategy – and it is evident from the dramatic increase in positions as of January 2015 that a huge effort was invested in staffing in the second half of 2014 – but it would have been better still if that recruitment push had been started 6-12 months earlier. Figure 3.2 From 2014 to mid-2015, UNHCR national positions (GS and NO) more than doubled Approved positions all Turkey (2014 - mid 2015) 250 227 226 200 150 121 107 100 46 46 50 27 33 28 37 36 15 0 Jan 14 July 14 Jan 15 June 15 General Service National Officer International Professional Finding 16. Some critical positions were left unfilled for too long Beyond the lack of a strong dedicated HR function within the Ankara office, additional factors contributing to slow staffing were reportedly (a) late recognition on the part of management of the need to staff up certain areas that could have been anticipated (for example programming and supply),44 (b) difficulty finding candidates for certain types of positions (programme, supply, project control, human resources management, information management) that are in short supply system-wide, and (c) cumbersome staffing procedures particularly for local recruitment that falls outside the fast track processes. For whatever combination of these and other factors, at a time when operations were expanding rapidly, essential Programming and Supply sections were characterised by unfilled international and national positions, and short-term assignments that did not permit relationship-building with Government and partners, consistency of programming and contracting approaches, and continuity throughout the programming or procurement cycle.45 In addition, positions that are critical for interagency coordination, donor relations and communications were left unfilled or at too junior levels for longer than necessary. The problems of staffing were even more evident at the Gaziantep level, where positions were slow to be created and staffed despite front-line pressures. The vacancy rate was 60% in July 2014 and 40% in January and July 2015, and strong national staff were lost to other agencies offering better terms and more job security as soon as Gaziantep became a hot job market for skilled national staff. 44 In March 2014, a senior management mission to Turkey assessed the need for an organisational redesign and for priority staffing. The mission recommended a protection-centric approach including more resettlement resources, but was silent on programming, operations and even Gaziantep 45 It is important to note that these shortcomings observed in the period under evaluation have been partly addressed in the course of 2015, and that as of the end of 2015 all functional areas of the operation have a core of stable and experienced staff. The rapid turnover seems to have stopped, although there are still insufficient positions in some key areas and in particular in areas planned for greater attention in the near future

28 FULL REPORT Recommendation 4. UNHCR Turkey should continue strengthening its HR capacity in order to support the continuing growth of its programming and protection commitments in Turkey. Specifically: (a) UNHCR Turkey should intensify efforts to recruit mid-level managers and officers with 21st century skills, including information management, cash-based interventions, modern HR management, and strategic communications; and (b) UNHCR in Turkey should maintain the current policy of staffing key positions with national officers, wherever appropriate Management efficiency UNHCR has a lighter administrative and management regime46 for emergencies, and a heavier one for regular/ongoing refugee situations. Because Turkey is not considered as an emergency operation, it is subject to the heavier and more cumbersome requirements of a normal programme. However, with more scale and complexity, and without a commensurate growth in programming and administrative capacity, the operation is caught in an uncomfortable squeeze where it is often unable to meet HQ requirements on time or at the levels expected, or it does so by placing huge stress on a small hard-working team. Finding 17. Several staff in the country office feel that the burden of complying with heavy corporate processes detracts from their ability to manage more strategically By way of example, the new HQ procedures for the selection of Implementing Partners requires a cumbersome universal proposal submission and evaluation process, which in Turkey generated 53 detailed proposals to evaluate,47 of which 12 were recommended after review by Ankara and UNHCR HQ, and a further 19 were retained as “potential”. In another example, the requirement to make public announcements for national staff positions, combined with the need to receive paper applications on P11s, has resulted in over 3,000 paper applications being received and manually processed, for about 70 local staff vacancies.48UNHCR has reportedly received six different audit or evaluation missions led by various stakeholders in a six-month period (including this evaluation team). And a final example (cited earlier) is that UNHCR in Turkey is now planning with 5 Population Planning Groups (PPGs), essentially requiring UNHCR to sub-divide the operation for planning, results measurement and budgetary purposes into five separate sub-programmes – some of which are managed in whole or in part by four different offices inside Turkey. At a time when the activities for different groups are actually merging as UNHCR moves towards area-based community-based protection and integration with national systems, and as UNHCR is seeking to gain economies of scale, it makes even less sense to artificially separate the operation into 5 PPGs. To a large extent these problems are corporate and cannot be resolved locally or maybe not even globally49 – but the evaluation team has to note that the combined effect of so many HQ processes and accountability mechanisms is that the small programme team spends too much time on data entry and paperwork, and not enough on ensuring the quality of programme design and IP agreements, or on monitoring programme performance. Similarly, the administrative staff spend so much effort on required 46 Lighter processes, higher thresholds, more delegated authorities 47 Communication from UNHCR Ankara 48 UNHCR staff interviews 49 Many of these administrative requirements result from UN regulations, EXCOM decisions or donor requirements

FULL REPORT 29 paperwork that they are not able to devote as much attention as they would like to thinking ahead and strategically managing staffing, travel and financial management. As a way forward, UNHCR Turkey could inventory the corporate processes that are placing an excessive strain upon their limited field capacity, and then UNHCR HQ should assess and explicitly agree with the field which processes can be curtailed or simplified, or moved under “emergency” rules, in order to enable the field to meet essential programming and administrative requirements. Finding 18. Frequent and uncoordinated visits from HQs and donors place a heavy load on senior management Finally, UNHCR Turkey has attracted a huge amount of public and political attention, receiving a constant and recently accelerating stream of senior UN and donor visitors. While UNHCR does and will no doubt continue to do its best to support all these visiting missions, and whereas senior management sees supporting senior missions and donor visits as an essential part of their jobs, there is also no doubt that the amount of time spent supporting these senior visits leaves less time for their core management work. Visits will not cease and nor should they, but with some advance planning they could be better anticipated and managed, similar visits could be bundled, and timing could be better coordinated. In the development realm, the principle of joint donor missions and “mission blackout” periods are well-established, and have been somewhat successful in leaving field people some predictable time in which to handle their other essential business. The problem of targeting when there is no data Finding 19. The lack of systematic vulnerability data inhibited the ability of UNHCR and its partners to prioritise vulnerable Syrian refugees in Turkey It was observed in the Context Chapter that UNHCR does not register Syrian refugees in Turkey, and furthermore UNHCR does not have access to the Government’s registration data (see more detailed discussion in the Protection Chapter below), which in any case does not capture key vulnerability information such as family structure (i.e. whether there are adult breadwinners or girls susceptible to early marriage), disabilities or special needs. Without knowing who the refugees are, or even how many and where they are, it is impossible to effectively target them for protection or assistance. Finding 20. UNHCR attempted, but was prohibited from conducting a comprehensive needs assessment In normal circumstances, generating, analysing and disseminating data and information are core UNHCR activities and provide UNHCR with the authority and the tools to coordinate other actors in the emergency response, as well as to ensure that its own programme responds to the priority needs of refugees. Especially in a fast-changing and resource-constrained environment, accurate and timely information and analysis is indispensable for tailoring programmes to the needs of persons of concern, and in particular those most vulnerable. To fulfil this core function UNHCR's Emergency Information Management Toolkit50recommends that UNHCR should lead a comprehensive nation-wide “joint” multi-sectoral needs 50Emergency Information Management Toolkit, UNHCR, Field Information and Coordination Support Section, Division of Programme Support and Management, UNHCR Headquarters, Geneva

30 FULL REPORT assessment, but despite UNHCR’s sincere efforts in this respect from 2013 onwards,51 the Government did not permit UNHCR to do this. Instead, the Government conducted its own much more limited assessment through AFAD, which to this day is the only general profile of Syrians in Turkey.5253 Whatever the reasons for this,54UNHCR staff, implementing partners and other relevant stakeholders55universally stated that lack of data from the Government (sex and age disaggregated, numbers of persons of concern, protection vulnerabilities, their ability to access assistance, health and education services, education and skills levels, income and economic potential, housing) was the greatest constraint to the formulation of effective and coherent programming. Table 3.2 Q. 11 (Survey) "How effective was UNHCR in supporting the Government of Turkey to protect the following groups of Syrian refugees?"56 STRONGLY SOMEWHAT GROUP/PERCEPTION EFFECTIVE NOT EFFECTIVE EFFECTIVE EFFECTIVE Women 36,4% 57,6% Children 45,5% 48,5% Disabled persons 33,3% 54,5% Elderly 36,4% 51,5% Only a third of UNHCR's policy and programming staff believe that UNHCR is effective in supporting the Government of Turkey to protect the most vulnerable Syrian refugees. One principal reason provided in survey responses was the problem of data: "the identification of categories at risk and with acute vulnerabilities depends on the introduction of an effective, protection sensitive registration system", and "current registration procedures do not allow for an accurate recording of vulnerabilities, thus weakening the capacity to identify and respond to situations of vulnerability,”57and “since UNHCR is not involved in the registration of Syrian refugees and has limited access to data on vulnerabilities (through partners), designing and implementing effective interventions can be challenging.”58 51 UNHCR planned and contracted a comprehensive profiling exercise profiling exercise in 2013, but just prior to launch the Government requested that this be handed over for implementation by AFAD. Similarly, a nutritional assessment was conducted by the Government and UNICEF but its release was cancelled by the Government 52Syrian Refugees in Turkey 2013; AFAD, 2013, followed by another profiling report on Syrian women based on the same data. The evaluation team was informed that, in the next round of registration validation planned for 2016, DGMM intends to collect vulnerability data and bring the registration closer to UNHCR standards 53 A comprehensive nutrition survey of Syrians was conducted by the Government and UNICEF, but was shelved a few days before its planned release and has still not been made public 54 The evaluation team heard several reasons why the Government might not have shared their data: the logistical magnitude of assessing millions of refugees scattered all over the country, institutional capacity weaknesses, jurisdictional obstacles, legal concerns around privacy of personal information, policy concerns around “guest” status etc. 55 Interview notes with UNHCR, UNDP, UNICEF UNFPA and UNHCR's IPs 56Survey results, Q.9 (See Appendix IV) 57Response to Q.13, Survey report 58Other response to Q. 13, Survey report

FULL REPORT 31 The evaluation team was informed59 that the Government of Turkey intends to include a wide range of profiling information in a planned round of registration validation. Even though it seems unlikely that the Government of Turkey would release the raw data from this exercise, assuming that it goes ahead as planned, the data would at least be captured and would (a) presumably be made available to Turkish authorities who are the primary providers of services to Syrian refugees, and (b) in some de-personalised and aggregated forms the data could be used to provide a much more accurate profile of the Syrian population that would support the evidence base for planning. Recommendation 5. UNHCR Turkey should support the Government to conduct a comprehensive vulnerability assessment in conjunction with a validation exercise planned to take place in the near future, taking care to ensure that the hard-to-reach populations (which are also likely to be among the most vulnerable) are included Finding 21. Distribution of e-vouchers and CRIs provided a pathway to household vulnerability assessment when a direct survey was not possible In the absence of a comprehensive survey, a wide range of agencies, NGOs and government bodies have been conducting their own local, unconnected and issue-specific surveys. While there was a considerable caution initially (given the Government’s blanket prohibition on collecting personal information on Syrians in Turkey), the number and range of these local surveys grew as the need for them became inescapable, and in particular in order to allow Government and UNHCR partners to determine to whom winterisation and other material should be distributed. During the evaluation mission the team identified five main sources of such piecemeal assessment data: (a) surveys conducted by municipalities and local NGOs with little or no reference to UNHCR and the formal refugee assistance system, (b) surveys conducted by UNHCR’s and WFP’s partners in order to target Core Relief Items (CRIs), food assistance, or cash/e-vouchers to out of camp populations, (c) intake and programme data collected by community centres,60 (d) ad hoc studies on regions or issues conducted by Turkish and international NGOs and think tanks and published in English, Arabic and Turkish,61 and (e) periodic participatory assessments (AGDM studies and focus group discussions in the context of 16 days of activism against SGBV) conducted by UNHCR itself. Those vulnerability assessments that were conducted at the household level for purposes of distribution planning used similar criteria, and efforts were taken throughout 2015 in particular in Gaziantep to coordinate the vulnerability assessment criteria through a vulnerability assessment sub-group of the NFI/CRI (Core Relief Items) working group. 59 Interviews with Government of Turkey and UNHCR 60 ASAM, HRDF and STL Needs Assessment Reports in Gaziantep, Hatay and Istanbul 61 See in particular, IMC-Care's Gender-based needs assessment on the Kobane influx in September 2014, Concern's beneficiary-based needs assessment from 2013, and IMC's beneficiary-based needs assessment from Gaziantep in March 2015

32 FULL REPORT Finding 22. Although CRI and e-voucher coverage was low in relation to the population, recourse measures were in place where distribution programmes were operating The evaluation team was not able to meet refugees or to validate the quality of this vulnerability targeting, but has no reason to doubt its integrity, and did observe a number of recourse mechanisms in place to allow refugees to seek redress if they felt they qualified for a benefit that they did not receive. Finding 23. Some valuable data is not shared, thereby inhibiting effectiveness and efficiency of service delivery Beyond the challenge of actually collecting data from refugees in a regulatory context where this is formally prohibited but practically tolerated, there is a secondary and related problem that organisations which have data are reluctant to share it openly. Some data is published (often in a sanitised form), but a lot of important raw data is retained by the surveying organisations, and therefore not available to other parties trying to analyse similar problems or even distribute items to the same population. Data sharing is a missed opportunity in IMC Rapid Needs Assessment in Gaziantep two respects. Firstly, the existing piecemeal assessments could be The Rapid Needs Assessment by International Medical Corps in July assembled to develop a composite 2015 surveyed 5,190 individuals from 948 households in 63 portrait of vulnerability. This could be neighbourhoods of Gaziantep. This study showed the high rate of overlaid with recently-released employment among Syrian refugees and the sectors of their labour DGMM data on the distribution of the market - 93% of respondents had at least one family member gainfully employed and 22% had more than one family member Syrian refugees, and then this hybrid earning an income. It showed that 12% of school-aged children were profiling information could be working rather than attending school, as well as information on why provided to all stakeholders (including refugees in Gaziantep were choosing to live in urban areas rather government) to help them improve than camps. the evidence base of their planning. Such detailed data gathered, compared and validated from other refugee hosting areas could have been compiled by UNHCR and Given the concerns expressed by provided to partners as a starting point for joint planning, but such DGMM regarding a comprehensive was not the case. needs assessment, and until such time as DGMM conducts a deeper and comprehensive assessment as part of the planned validation, it is recommended that UNHCR take measures to consolidate existing needs assessments and refugee-centred consultations at the provincial level in order to assist all stakeholders in their planning efforts.62 Such an approach was effectively taken by UNICEF in its work with provincial authorities; despite the fact that it faced many of the same obstacles experienced by UNHCR, UNICEF nonetheless succeeded in establishing shared needs assessments and action plans with most provincial authorities. Recommendation 6. Pending a comprehensive national vulnerability assessment of Syrian refugees in Turkey, UNHCR Turkey should assemble all of the existing needs and vulnerability assessments, and the results of various refugee-centred consultations, and build a composite portrait of the vulnerabilities of the Syrian refugee population 62 The evaluation team was informed that this was included in current UNHCR planning

FULL REPORT 33 Finding 24. There is a significant and rapidly-growing body of academic and technical literature on Syrians in Turkey but it is fragmented and hard to access But secondly, there is a great need in Turkey for a neutral platform to share all information and analysis on the situation of Syrian refugees. Syrians in Turkey have become a favoured topic of new academic research, and there are presumed to be hundreds of Masters and PhD theses being written on the topic at the moment, especially but not only in Europe and in Turkey, and in Arabic and Turkish as well as English. What is needed is a managed central online repository of this research and analytical material, housed in an established university or non-Governmental policy body, supported by the smallest of Secretariats to continue to search for and classify new material, and possibly to create a periodic digest of key research for distribution to interested stakeholders. A step up from this would be to convene an annual academic conference where researchers and policy analysts could come together and collectively advance their understanding of Syrians in Turkey. Recommendation 7. UNHCR Turkey, in conjunction with other stakeholders, should facilitate the creation of a managed central online repository of data, research and analytical material on Syrians in Turkey, possibly to be housed in an established university Conclusion In the original TORs and draft of this evaluation, there was no explicit discussion of “Strategic Positioning”, but interviews and lines of enquiry kept coming back to an implied central question: “what can UNHCR learn from the unique Turkey experience that can help UNHCR be more effective in similar contexts” where there is a confident host government in a middle income country that is experiencing a huge refugee influx. UNHCR’s role in Turkey is quite unlike its role in a “classic” refugee emergency, arguably it is different than its role in Jordan or Lebanon, and closer to what might be expected if ever UNHCR were engaged in a large-scale refugee influx into a BRIC country. Most of the conventional mechanisms of humanitarian coordination, models of assistance and conventions of donor relations are irrelevant – and international staff who come into this sort of context (or who view Turkey from the distance of Amman or Geneva) with deeply-entrenched assumptions about what UNHCR should do and how UNHCR should do it are going to be at a serious disadvantage. Particularly when the context of Turkey is overlaid with the political pressures of the Turkey-Europe relationship and of Turkey’s strategic role in the region, nearly every policy or programming move is fraught with risks and tensions. Thus, it is that every UN agency and INGO, and every donor (all of this is not unique to UNHCR) is constantly walking on eggshells: afraid that the slightest misstep would cause offence or break a fragile equilibrium.

34 FULL REPORT 4 Protection Legal policies and support Finding 25. Across all sectors covered by this evaluation, UNHCR has provided policy advice and technical support to Government that has been key to the protection and well-being of Syrian Refugees in Turkey It was observed in the Context Chapter that Turkey provides an extraordinarily welcome policy and legal environment for refugees, all the more extraordinary considering that the key recent legal changes were approved during a period of political transition and in the midst of a mass refugee influx. While the bulk of the recognition for this achievement must go to the government and people of Turkey, there is no doubt that UNHCR’s patient policy advice and technical support were instrumental both in the framing of this legislation,63and in the building of the national institutions to implement it. Although many Syrians remain in very difficult circumstances that need to be better addressed, as cited elsewhere in this report one of the most impressive features of Turkey situation is the high number of refugees in focus groups and surveys who state that they are satisfied with the conditions of their lives and with their ability to live, work and find protection in Turkey. Finding 26. The Policy Development Unit is key to the entire operation, and from a value for money perspective is one of the most important investments UNHCR has made in Turkey One of the most strategic and efficient work units in the entire Turkey operation is the Policy Development Unit, a group of 15 staff within Protection that specialises in providing technical support, legal advice, interpreters and a substantial volume of training to the Government of Turkey. There was material support as well that was instrumental for building the Government’s registration system and building up the new Government Agency DGMM, including 34 purpose-built mobile registration/coordination vehicles, ICT hardware and software, and interpreters - all for a combined cost of over $24 million. Registration The story of Syrian refugee registration in Turkey is convoluted. The very first Syrian arrivals in April and May 2011 were registered by UNHCR in the same way that UNHCR registers non-Syrians.64Quite quickly, after it was determined that Syrians would be treated as “guests” and housed in “temporary 63 ILO also needs to be recognised for their efforts with UNHCR on the breakthrough work permit regulations of early 2016 64 Even today, UNHCR has responsibility for registering non-Syrian refugees, although that workload has increased so much in the last three years that this is now handled as a two-step process with a wide-reaching IP ASAM handling pre-registration

FULL REPORT 35 accommodation centres”, AFAD took over registration – but this was limited to the basic information required for determining family size, allocation of temporary housing and eligibility for camp supplies. AFAD issued “camp cards” with no legal standing, although some refugees initially thought these were government ID cards. Already at this early point, UNHCR was advocating for full formal registration including vulnerability assessment, but the Government assumption was that Syrians were only in Turkey temporarily, and the policy was to treat them as guests (see Context chapter for more details). By 2013 the number of Syrians outside camps was so significant that the Government decided to begin The strategic value of interpreters registration – and was immediately faced with the challenge that Syrians, who had hitherto enjoyed By providing interpreters, UNHCR (a) freedom of movement, were dispersed across the accelerated the registration process, (b) created country. The task of initial registration was divided goodwill with Government, (c) was able to do between AFAD for camps, and outside camps to the some quality control on registration, and also (d) obtained intelligence on the nature of the Directorate General of Security of the Ministry of the refugee population that could be used by Interior. Initial registration by AFAD was done using a UNHCR for planning. software COGENT that has a maximum capacity of 1 million records, and registration outside camps was done by the Foreigner’s Police using their own software POLNET that is used for registering foreigners, visitors and also criminals. While waiting for the official process to catch up, some municipalities and NNGOs undertook their own unofficial registration using a variety of local methods. Thus, in 2013 there were three different registration systems in place. None of these systems were capturing vulnerability data – the sort of data that could be used for targeting, for programme planning (by governments or humanitarian agencies) or for resettlement screening. Finding 27. The sharp increase in Syrian refugee numbers in 2014 was mostly due to the rate of registration of refugees already in country, not the rate of new arrivals Meanwhile, DGMM was in the process of being created based on the 2013 Law on Foreigners and International Protection (LFIP) that came into force in April 2014. From 2014 DGMM started to take over responsibility for registration, and in mid-2014 launched a big push to register as many as possible of the out of camp Syrians by the end of the year – which is the primary reason why the Syrian population numbers peaked sharply in late 2014 – this was the result of accelerated registration not accelerated arrivals. For this big push, DGMM initially agreed with UNHCR’s recommendations to include vulnerability profiling data, but as their capacity was still being built, and there was a critical shortage of both interpreters and time, compounded by the broad geographic distribution of Syrians, the Government decided to continue with a limited biodata registration mainly using police registration through POLNET, and DGMM registration in some urban centres where DGMM had established an office, and using mobile registration units provided by UNHCR.65 65 UNHCR purchased 23 Mobile Registration Units for AFAD and 11 for DGMM

36 FULL REPORT Finding 28. UNHCR has significantly supported the Government of Turkey to build the largest refugee basic bio-data registration system in the world In early 2015, with considerable preparatory support from UNHCR in 2014, DGMM launched a third software module for registration called GOCNET, which allowed the amalgamation of the POLNET and COGENT databases and permitted the identification of double-registrations. This system is now stable. There was an important change in all the ID numbers issued in order to remove ambiguity about Syrian access to services, and although there are backlogs in some locations at some periods, for the most part the Government is now able to keep up with new registrations, location transfers and changes in civil status for example due to marriages, although there is still a major gap in the civil registration of newborns resulting mainly from a lack of awareness on the part of refugees of the need to obtain civil registration from DGMM in addition to the birth registration provided by medical authorities. There are three main reasons for new registrations: (a) there are still new arrivals into Turkey from Syria: two official land border crossings remain open to Syrians who meet specific criteria (see discussion below), and irregular crossings continue with and without the assistance of people smugglers. Through the TPR, Turkey has very importantly maintained a provision that Syrians registering within a certain period after arrival will not be penalised for arriving irregularly; (b) there are an unknown number of Syrians in Turkey who have chosen not to register until now, sometimes because they simply do not know how to register or the value of registering, or they were born in Turkey, or they are afraid to approach the Foreigner’s Police (reportedly the case for some women and unaccompanied minors), or they want to keep open the option of traveling on to Europe and fear that registration in Turkey will expose them to being sent back to Turkey under a readmission agreement;66 and (c) there are many Syrians in Turkey who entered with a different status and using their passports, and who now are unable to renew their passports and/or who desire to “convert” their status from student or visitor or resident to temporary protection. There is no doubt that UNHCR’s material assistance (registration vehicles, computer hardware and software) and technical assistance (advice, training and interpreters) was instrumental in enabling the Government to register over 2.5 million refugees in such a short period (mostly in 24 months), and in enabling the Government to merge different datasets into the single consolidated GOCNET. Recommendation 8. UNHCR Turkey should continue to provide technical (including interpreter) support to DGMM for continuous improvement and implementation of Syrian registration Finding 29. From a protection viewpoint, it was better to do a light but universal registration than a slower and more comprehensive registration NGOs, Turkish Government Departments, Turkish municipalities and Turkish academics have all criticised the Government for not having captured vulnerability data that would allow better planning and targeting, despite UNHCR’s strong recommendations and multiple offers of support. However, after weighing up the protection risks of a large number of Syrian being unregistered for longer as a result of a 66Assuming that the exit route to Europe will become more difficult in 2016 onwards, it can also be expected that a significant number of Syrians who are in Turkey “in transit” to Europe will now find themselves “stuck” in Turkey, at which point they are likely to register when they see the benefits of doing so

FULL REPORT 37 prolonged but deeper registration process,67 against the protection benefits of refugees having a summary registration below UNHCR standards but that also provides a photo ID and a number that together immediately provide Syrians with access to government services, the evaluation team came to the conclusion that the rapid and light registration approach used (by necessity) by the Turkish authorities was the better approach from an overall protection standpoint. Now the first round is complete, the priority should be (and indeed is) to validate the initial registration and include vulnerability data on the next round. The challenge facing all stakeholders as they consider deepening their vulnerability assessment and service outreach in the coming years, is that there are four groups of people who are at risk of remaining beyond the boundaries of conventional vulnerability assessment: (a) Syrians in small and remote communities,68 (b) Syrians who are not in their provinces of registration (usually to find work),69 (c) Syrians who resist registration or who are socially excluded even after registration (for example the Dom minority, LGBTI persons, Syrian Yazidis), and (d) Syrians who are registered but who are underreporting their vulnerabilities: most obviously the case of domestic violence, family-sanctioned child labour, and early or plural marriage. These “hard to reach” groups of Syrians have been on the radar screen of UNHCR and other stakeholders since the beginning, but finding ways to identify and then support them has remained a constant challenge. Access to territory/asylum: reception conditions Reception conditions In the Turkey context, “reception services” include a very wide range of places and processes where Syrian refugees transact with Government authorities and with their supporting agencies, including UNHCR. The evaluation team (indeed UNHCR itself) was not permitted or not able to assess all of these locations, and cannot provide a confident overall assessment of the adequacy of reception conditions. However, third party observers, media reports, agency reports and our limited observation provide the following assessment of reception conditions. 67 An approximate calculation based on registration benchmarks in Lebanon and Jordan is that registering 2,500,000 people with average family size of 4 and only capturing basic biodata (level 2) through a translator takes 390 person- years – not considering the logistics of doing this in 81 cities across Turkey. This is a task that UNHCR could not possibly have achieved in two years using its normal methodology, and probably not in four years. 68 The DGMM website as of mid-March 2016 listed 34 provinces where there are fewer than 1,000 Syrian refugees registered 69 It was reported that in the agricultural season up to 500,000 Syrians many of Kurdish background leave their camps and communities to spend 6-8 months working a cycle of season agriculture labour, following the harvest of different crops in several locations across Eastern Turkey

38 FULL REPORT Reception at the border Finding 30. Instances of mass influx were well-managed by UNHCR, Government and partners during the period under review Those Syrians who were and still are allowed to cross the border into Turkey without passports arrived in small numbers and were reportedly well-received.70Because since early 2015 the criteria for official entry are effectively limited to medical emergencies, “humanitarian cases” and family reunion cases,71 the point of entry also becomes a moment of determination whether the admitted Syrian will be referred to a Despite the fantastic efforts of the Turkish particular service provider or transferred to a particular Government, the sheer volume of this influx has left some gaps in service provision and in ensuring that women, men, boys and girls are safe within the sites which have been set up. The sites used are collective centres, with schools, mosques and other public spaces being converted into temporary shelters. Living in close quarters, with no gender safe spaces or dignified changing areas, is a struggle – especially for women. – NGO worker involved in Kobane influx location or a camp. In cases of sudden mass influx, notably Kobane in September 2014 and Akçakale in June 2015, by all accounts a full multi-agency screening, registration and Syrian refugees being admitted at Akçakale in June service referral machinery was set up at the 2015. Note the UNHCR-supplied mobile registration border with the cooperation of several vehicle in the background. (UNHCR photo) Government agencies, several UN agencies, the TRC and NGOs. After the initial registration and reception process at the border, Kobane influx refugees were housed temporarily in a range of existing ad hoc sites, where there were reports of overcrowding and inadequate safe WASH facilities for women and girls, as well as some increased risk of SGBV due to close proximity. 70 The reported instances of involuntary return or refusal of entry will be discussed separately in the next section 71 The Government policy remains that the border is ‘open’ and we were not able to find a public policy document or statement listing these criteria for entry

FULL REPORT 39 Reception in camps Finding 31. Refugee reception services in Turkey are varied. Reception conditions in camps are considered to be good, but reception services for refugees in urban and non-camp rural areas are limited Those Syrians referred to Turkey’s 26 “temporary accommodation centres” are welcomed into what have been widely described as the best equipped refugee camps in the world. They were reportedly built to higher As UNHCR, I am pleased with what I have seen than Sphere standards with some technical advice from at the camps. The international community UNHCR, and are complete with clinics, schools, markets, needs to be in solidarity for maintaining these high standards and implementing them electricity, cooked meals and the infamous washing everywhere. machines. Even though some of the five-year-old containers and many of the tents and mattresses are – UN High Commissioner for Refugees72 ready for replacement, and the Government has reportedly cut back some services to a more sustainable level, in material terms these are probably still the best refugee camps in the world.73But they are nevertheless still camps. With the exception of refugees who are under de facto administrative detention after being sent to camps under a 25 July 2014 directive because they have infringed some regulation or committed a crime outside the camps, Syrians can obtain passes to enter and leave the camp, and if they have sufficient resources and justification they can leave the camps indefinitely. In a heartening example of cross-border pragmatism, approximately 80,000 Syrian refugees were granted permits to return temporarily to Syria to visit relatives during the main Muslim religious festival season, after which they were readmitted to Turkey and returned to their places in camps. Initially UNHCR had no access to camps – which were set up, financed and managed by AFAD with the support of TRC. From the moment UNHCR was asked to provide material assistance and started delivering cooking kits, tents, mattresses and blankets, UNHCR began to get access, and indeed it has been convincingly argued that one of the most important benefits of the major CRI distributions of 2013 and 2014 was that they provided UNHCR with access to the camps and a protection foothold. Since 2013 UNHCR has visited camps regularly,74 and through these 4-5 hour visits (initially daily and now twice a week), has been able to provide protection presence and build up mechanisms of camp governance, vulnerability assessment and counselling.75 72Syrian Guests in Turkey, 2014, Prime Ministry Disaster and Emergency Management Presidency (AFAD), pp. 95; 98 73 Since it is reported that few Syrians are detained in removal or detention centres, we have not considered the conditions of those centres in this study 74 Access is still not perfect – as it was reported that UNHCR field staff currently do not have access to residential areas of two camps despite repeated requests to unblock this issue. The reason access is denied is reportedly due to personalities, although it was also suggested that denial of access might be a response to UNHCR's repeated expression of concern about alleged sexual exploitation in these camps during 2013-2014 75 One problem faced by UNHCR is a constant rotation of camp management staff such that UNHCR need to provide briefings and training repeatedly: a regular AFAD camp manager training programme might help provide some consistency

40 FULL REPORT Is this enough? Certainly not. The ideal would be a permanent UNHCR presence in every one of the 26 camps. But given the number of UNHCR vehicles and staff available, the large number of camps and their geographic distribution across an area of South Eastern Turkey about the size of Portugal, and given the growing number of out of camp populations and their increased vulnerabilities in relation to camp populations, a twice weekly visit was probably the most that UNHCR could afford. Should UNHCR leave the camps and focus exclusively on the urban populations? Certainly not either. Camps are still camps: dense social and political environments with their own stressors and problems, and attendant risks of domestic tension and violence. Questions that are challenging to raise culturally in Turkey are all the more difficult to raise in a camp setting where there is clear and established Government control, and it is in camps that UNHCR often has the most difficulty raising awareness of domestic violence, SGBV, child labour and especially early marriage.76 There is however significant room for improvement in how periodic camp visits are conducted. During the period under review, despite early requests by UNHCR staff, UNHCR has been unable to secure a permanent office space where UNHCR visiting field staff can post regular office hours and thereby ensure that refugees have predictable access to privately consult a UNHCR staff member. In the absence of this, UNHCR tend staff to monitor by driving around the camp, in the expectation that refugees who need to meet with UNHCR can stop and approach the car. The evaluation team agrees with field staff thatthis lack of a predictable time and place for refugees to meet with UNHCR greatly curtails the possibility of a private protection-related consultation, and limits the effectiveness of UNHCR camp visits.77 Recommendation 9. UNHCR Turkey should negotiate with AFAD to obtain a private office space in each temporary accommodation centre, where UNHCR field staff can hold regular office hours and meet confidentially with refugees in order to monitor welfare concerns The exception to the above discussion of UNHCR access to camps is a small number of informal refugee camps, mainly in the southeastern and eastern regions of Turkey, that have for the most part been set up by municipal authorities and outside the AFAD-managed camp system. Some of these were opened temporarily to accommodate the Kobane influx of 200,000 Syrians of Kurdish background, 120,000 of whom returned to Syria as soon as they felt conditions were favourable, and others have over time accommodated a mix of Iraqis and Syrians. At the moment, it is thought that these informal camps are empty or nearly empty, but they remain an area of protection vulnerability because of their informal nature, and because UNHCR staff are not able to officially monitor their reception conditions. In these regions, it remains vitally important that UNHCR field staff maintain steady contact and warm relations with provincial and municipal authorities, so that UNHCR can seek informal access when necessary. 76 According to UNHCR field staff, challenging situations have arisen in which MoFSP social workers and camp management do not agree on the same course of action: cases were cited of domestic violence or child marriage in which camp social workers felt that the police should be involved, but camp management preferred not to have the local police involved, and rather handle the matter themselves. There were also reports of camp managers assisting in making early marriage arrangements 77 In Q 9 of the online survey (see annexe) respondents feel that UNHCR protection in camps is weaker than UNHCR assistance in camps

FULL REPORT 41 Reception in Community centres Finding 32. Refugees are well received and supported by community centres, but their coverage is not and never could be sufficient Many Syrian refugees, sometimes deliberately if they crossed into Turkey irregularly, first contact the protection system of Turkey by walking in the door of an NGO office or Community centre. Initially UNHCR, and now increasingly DGMM and TRC, have worked hard to develop a more standardised system in Community centres for registration counselling to unregistered Syrians, and in some cases Syrians who urgently need access to medical services can have their registration processing accelerated through an advocacy intervention of the relevant organisation. The Community centres are safe places with well trained staff, and on the whole, provide a good mechanism for reception and eventually support or referral for vulnerable cases. The problem is that even these centres are only able to reach a fraction of the Syrian out of camp population, maybe 10%. Reception at ASAM offices Finding 33. ASAM field offices are vital to monitoring and promoting protection for up to 50% of the refugee population who reside outside the reach of UNHCR sub- offices, camps and community centres The evaluation team was able to visit two urban centres where there is no UNHCR presence and no community centre, and where the only presence linked to the UN refugee machinery was a satellite office of ASAM. UNHCR has supported ASAM to create a network of approximately 40 offices in most Syrian- affected parts of the country, and effectively these satellite offices serve as the remote sensing antennae for UNHCR as well as a local base from which UNHCR can develop relationships with local authorities. If refugees walk in the door of an ASAM office, we are confident that they will be given good advice, referred to the appropriate Turkish authorities, and assisted if they have an urgent need. This network of ASAM offices is vital to the ability of UNHCR to monitor reception conditions in remote areas of the country, and to permit the scaling-up of UNHCR engagement in the event of an incident or emergency. Reception at Government institutions Through our very limited and cursory observation of line ministry and municipal offices in regions without a UNHCR office, we obtained the initial impression that Turkish institutions are welcoming to Syrian refugees (for example local police offices doing registration, local PDMM offices handling file updates, local hospitals, local schools). However we were informed that the level of service provided to Syrian refugees is uneven due to two main factors (a) despite the distribution of clear Government circulars governing reception of Syrians, not all local officials are aware of the prevailing regulations and directives (for example because of staff rotation), and (b) even when they are aware, not all officials have the resources to fulfil the requirements set out in the directives (for example, not all local police offices have the time or equipment to keep up with the pace of registration, not all schools have enough classroom space for Syrian children, and interpreter services are in short supply everywhere).

42 FULL REPORT Access to the territory by Syrian asylum seekers Finding 34. UNHCR has to some extent been able to verify access to territory by Syrian asylum seekers; but that access and UNHCR’s ability to observe it have both become more limited over time UNHCR does not have a permanent presence on the border with Syria or at other border points such as Istanbul’s two international airports, although UNHCR does have access to visit borders. Because UNHCR does not have sufficient staff for permanent border monitoring, nor the permission to set up a permanent presence there, for information on border problems and instances of denial of access UNHCR generally relies on reports from IPs and NGOs present in border areas, and intervenes when they hear of a case or a situation that raises protection concerns. The admission regime from Syria into Turkey has become the subject of considerable international scrutiny, particularly late in 2015. During the period under review, January 2014 to June 2015, there was a definite and progressive hardening of the land border. Early in 2014 there were at least six land crossings open all along the border, and Syrians were able to enter without documentation. If they entered in a regular way, they were referred to a camp or to an urban centre to reunite with family, where they could register officially either through the AFAD channel or the foreigner’s police channel described earlier. If they entered irregularly, they were (and still are) able to register with the local authorities without penalty, as long as they do so within a prescribed time period. The first time the borders started to harden was at the time of the Kobane influx in September 2014. Faced with 200,000 people seeking entry en masse, the Government started to manage the arrivals, ensuring that the crossing was orderly, that people were screened for vulnerabilities, and started to screen arrivals for possible criminals and terrorists. At that time 200,000 Syrians were allowed to enter Turkey, one of the world’s largest sudden refugee influxes of recent years, and eventually 126,000 of them returned to Syria. In January 2015, the Government removed the visa waiver for Syrians entering by air,78 and thereby slowed the flow into Turkey of Syrians who were previously in Jordan and Lebanon, some of whom were flying to Turkey and from there making the sea crossing to Greece. From this point onward we can characterise the border as strictly managed. And then in March 2015, the Government introduced a very strict management regime and closed all but two land border crossings: Hatay and Kilis,79 admitting only people with emergency medical or humanitarian needs, or for family reunion.80 During the period being evaluated there were several alleged instances of ill treatment, push-backs, deaths as a result of live ammunition being used at irregular crossing points, and unlawful detention. Most 78 An exemption is in place for Syrians entering by land 79 Technically the crossing point at Suruc opposite Kobane is still open for returns to Syria. Note also that several crossing points are open for cross-border humanitarian operations, but not for refugee entry 80 As a demonstration of the delicate issues around Turkey’s Syrian border, as early as 2013 the European Union was exhorting Turkey to respect principles of non-refoulement, and at the same time formally requiring stricter management of the Turkey-Syria border “ … Carry out adequate border checks and border surveillance along all the borders of the country, especially along the borders with EU member states, in such a manner that it will cause a significant and sustained reduction of the number of persons managing to illegally cross the Turkish borders either for entering or for exiting Turkey”. European Commission, Roadmap towards a visa-free regime with Turkey

FULL REPORT 43 of the third party and media reports on such denial of access derive from the December 2014 Amnesty International Report: Struggling to Survive: Refugees from Syria in Turkey, which also highlighted a particular problem of access on the part of Palestinians from Syria whose documents are not recognised by Turkey and who therefore must risk irregular entry. Determining whether or not these allegations are well-founded is beyond the scope of this evaluation. However, regarding the extent to which UNHCR verified access to territory and took action as a result of allegations such as those of AI, what we observed is that, when allegations of this sort seemed credible and concerned refugee protection anywhere in the country including at borders, UNHCR informed the evaluation team that it has done what it could and still makes urgent and appropriate representations to the Government authorities in person and writing. The fact that UNHCR chooses not to “go public” when dramatic protection allegations are made is a judgement call on the part of the Representative that seems reasonable in the highly sensitive political context in which UNHCR operates in Turkey. The specific question of voluntary or involuntary returns is discussed in the following section of the report. Finding 35. With UNHCR advice and support, the Government set standards for camps that met or exceeded SPHERE standards, but the evaluation team could not observe whether they were met in practice Protection and solutions strategy: durable solutions UNHCR’s Protection Strategy81 UNHCR did not have a fully developed standalone “Protection and Solutions Strategy” in the 2014-2015 period, and argues that the situation was evolving so fast that a multi-year strategy would have needed constant revision. But UNHCR did have elements of a Protection Strategy, including a June 2014 internal policy paper that outlined a comprehensive set of protection priorities, a series of policy notes on the protection of urban (non-camp) populations leading up to a March 2015 Draft Urban Strategy, and specific strategies for resettlement and Refugee Status Determination. Most importantly, the overall approach to protection in any given year is described in great detail in the Country Operations Plan (COP). Finding 36. UNHCR’s overall protection approach was appropriate, but too cautious on issues such as early marriage, child labour and domestic violence that that are culturally loaded and difficult to tackle Was UNHCR’s protection approach appropriate? On the whole, yes. The focus on legislation and building Government and partner capacity including for registration was absolutely the most strategic investment and helped secure one of the most favourable asylum regimes in the world.82 81 At the conclusion of this chapter the evaluation team provides an overarching recommendation on analyses, strategies and action plans that proposes a linked set of framing documents to guide the operation’s protection work in the future. This recommendation seeks to minimise the amount of new work, link as much existing work as possible, and ensure that analysis and evidence inform strategies, that in turn guide action 82 A piece of unfinished business regarding the TPR and its regulations is to include explicit reference to the roles and responsibilities of municipal governments, who are providing an increasing proportion of the support to Syrians but without an unambiguous mandate to do so

44 FULL REPORT Regarding the balance between protection monitoring in camps vs urban areas, the operation was perhaps a little slow to shift resources from camps to urban areas and still has difficulty reaching some regions (see above), but has clearly made the transition and is now taking the logical next step towards community-based protection, outreach from the platforms of community centres, and monitoring through area-based multi-functional teams. Where the evaluation team believes the operation still needs to pay more attention is on those hard-to-tackle issues that are problematic domestically in Turkey and not just for refugees, namely child protection (especially child labour, early marriage and institutionalisation of unaccompanied minors), domestic and sexual violence, and human trafficking (see sections on SGBV and Child Protection below). Voluntary Repatriation Voluntary repatriation from Turkey to Syria has had an interesting trajectory. In the initial years of the influx, when it was assumed by the Government that Syrian refugees were truly temporary, the Government reported several hundred thousand voluntary returns to Syria, as seen in this image taken from the April 2014 UNHCR Monthly Report (note the data source is AFAD).83 Figure 4.1 In 2013/2014 Syrian refugees flowed back and forth across the Syrian border It is not entirely clear what was happening during this period, but it seems likely that what is being recorded here are mainly arrivals and departures from camps, and the departures would have included some Syrians moving to urban areas, some who were returning temporarily to Syria, and others who were returning permanently to Syria. It is important to recall that in this early period Syrians were regarded as guests, the border with Syria was open to two-way flow without much regulation, and there is known to have been a significant amount of back-and-forth movement as families visited, government employees collected their monthly salaries, and business owners checked on their farms and their property. 83 Confirmed by various Government of Turkey reports

FULL REPORT 45 In 2014, with the entry into force of the TPR, a legal framework for Syrian voluntary repatriation was put in place. UNHCR does not have an identified role in repatriation within the TPR itself, but the law permits the Government to cooperate with international organisations and civil society organisations. Perhaps reflecting the optimistic mood of the moment, UNHCR expected that observation of voluntary repatriation would be a major activity in 2014, and included this as one of the eight protection performance indicators in the RRP6, recording the observation of 6,712 of a targeted 41,300 interviews. Finding 37. UNHCR is careful only to endorse voluntary repatriation that is truly voluntary However, during the course of 2014 the voluntary repatriation context changed in two important ways. The first is that the cross-border ebb and flow seemed to decrease, with more flow into Turkey and less ebb back to Syria.84 Secondly, the Government enacted a regulation in June 2014 that permitted the authorities to refer to reception centres “those among the Syrian foreigners who are involved in commission of crimes, who are considered a threat to public order and public security due to other reasons, and those who are begging and living in the streets despite warnings.”85 With such a broad scope, this regulation permitted the authorities to round up undesirables, in particular those causing a public nuisance in cities and tourist regions, and offer them two choices: to return to Syria or to be relocated to closed camps. At this point UNHCR drew a line in the sand, and thenceforth declined to observe the voluntary repatriation interviews of Syrians who were involuntarily in camps. Still today, UNHCR declines to observe interviews in these conditions and does not endorse those repatriations or have reliable estimates of their numbers.86 UNHCR does continue to observe voluntary repatriation interviews for persons who seem to be expressing an unfettered choice, and internally reported observing 4,703 Syrian returnee interviews in 2015. Thus, the current position of UNHCR on voluntary return is made up of two components – on the one hand UNHCR clearly believes and publicly states that they do not encourage any return to Syria because the conditions there are not safe for returnees, and on the other hand they do agree to observe voluntary repatriation It takes two to tango. We need to work interviews for a few thousand Syrians each year whose with the government, we need to respect requests to return in an organised way seem to be voluntary. In them. either case, in the short to medium term, voluntary – UNHCR Protection officer repatriation is not a significant durable solution for Syrians in Turkey. 84 We were not able to find published Government figures for voluntary repatriation to Syria for all of 2014. In 2014 the major cross-border event was the arrival from Kobane of 200,000 mainly Kurdish Syrians, which included the involuntary return of approximately 120 Syrians in conjunction with that influx (US State Department Annual Human Rights Report 2014), and the voluntary return of about 126,000 within a few months 85 Government circular, June 2014 86The numbers at least until June 2015 are not thought to be substantial, and even Amnesty International stated in late 2015 that “Up until September this year, the main human rights concerns facing refugees in Turkey have not included unlawful detention and deportation”, but Amnesty International goes on in that report Europe’s Gatekeeper to predict that involuntary returns would increase in 2016 as a consequence of measures agreed with Europe to discourage the Aegean Sea migration

46 FULL REPORT Long-term stay in Turkey Finding 38. Durable solutions are still a distant prospect for refugees in Turkey, and the default path of longer stay in Turkey with temporary status but most economic and social rights seems the most likely There is no doubt that the long term well-being and security of over 2,700,000 Syrians in Turkey is thanks to the considerable moral and material support from the Government and people of Turkey. The international community has contributed, and more than the Government usually gives them credit for, but that cannot detract from the unprecedented contribution of Turkey itself. Whether the welcome is extended and deepened will also depend upon the Government and people of Turkey. In this, the Government has been ably supported by many stakeholders and notably UNHCR, whose principal efforts regarding durable solutions have centred on helping the Government create the legislative and enabling policy environment that would provide Syrian refugees with access to social and economic rights in Turkey. UNHCR has contributed significantly to strengthening this conducive environment for Syrians to sustain themselves, to adapt to a long-term stay in Turkey (called “harmonization” by the Government of Turkey), and ultimately to contribute to the social and economic development of Turkey. UNHCR’s specific investments in education and community empowerment are the subject of subsequent chapters of this report and will not be covered here. Resettlement Before the Syrian influx, Turkey already housed UNHCR’s second-largest resettlement programme in the world.87 This stems from the conditions under which Turkey ratified the UN Refugee Convention and from Turkish legislation, which essentially consider non-European asylum seekers to be conditional refugees, allowed to stay in Turkey and to benefit from Turkish social services on the condition that they are first determined to be refugees (a process currently managed by UNHCR) and then resettled. At the beginning of 2011, Turkey housed 16,750 persons of concern to UNHCR, about half of whom were deemed refugees (mostly Iraqi) while the remainder were asylum seekers awaiting status determination (mostly Iranians and Afghans). In 2010, 6,800 cases were submitted for resettlement and 5,300 departed – so the situation at the start of 2011 was more or less in equilibrium between low arrivals and high rates of resettlement departure. Fast forward to 2015, and the scenario is entirely changed. First of all, the number of non-European and non-Syrian asylum seekers in Turkey has risen to over 250,000, mostly Iraqis and Afghans. And that is not counting those who are in Turkey “in transit” to Europe and who have not started the asylum process in Turkey, or those who are expected to be returned from Greece. Despite valiant efforts, the UNHCR office in Turkey has been overtaken by the surge in the caseload, which is colliding with the painstaking and labour-intensive triple processes of registration, refugee status determination and resettlement processing, to create an immense backlog. The 10,191 non-Syrian resettlement submissions made from Turkey in 2015 were a huge achievement, but only a drop in a bucket that keeps on filling. 87 In terms of submissions, Turkey was second in the world in 2012 and 2013, and first in 2014 and 2015 (UNHCR data http://www.unhcr.org/statistics/unhcrstats/573b8a4b4/resettlement-statistical-database-portal.html)

FULL REPORT 47 Regarding Syrians, resettlement was not even considered until 2014.88 Figure 4.2 Resettlement of Syrian refugees from Turkey was limited in 2014 and 2015 SYRIAN RESETTLEMENT FROM TURKEY (UNHCR DATA) 9000 8099 8000 7000 6000 5484 5000 4000 3000 2000 1140 1000 59 25 282 0 2013 2014 2015 Submitted Departed The big difference between processing Syrians and non-Syrians from Turkey is that, for non-Syrians, UNHCR completely manages the registration, RSD and resettlement processing. For Syrians, the Government manages the registration (at a level of detail and accuracy that is below UNHCR’s standards, as discussed above) and does not provide registration data to UNHCR. Furthermore, there is no refugee status determination because under the TPR Syrians are not considered by the Government of Turkey to be “refugees”. In this uncomfortable situation, and recognising the genuine protection need for some particularly vulnerable Syrians to be put into a resettlement process, in 2014 UNHCR started to gather names for resettlement from its main NNGO partners who were operating community centres providing counselling to Syrians. In an intense effort starting in August 2014, 5,484 cases were prepared and submitted to the Government of Turkey for exit permits – which were denied. The refusal of exit permits resulted from a misunderstanding between UNHCR and DGMM: UNHCR had not prepared the way with DGMM by explaining the reasons and the process they were following to select these cases, and DGMM was under the impression that these initial cases were cherry-picked and did not meet the agreed vulnerability criteria. In the end the misunderstanding was resolved, UNHCR agreed to take referrals from the Government,89 and most of the frozen cases were released for departure.90But unfortunately the damage was already done. As soon as the initial and exhausting effort from UNHCR was stalled, and processing stopped almost entirely from January to March 2015, most of the resettlement receiving countries concluded that resettlement from Turkey was going to be difficult and slow, and 88 UNHCR’s 2014 Global Resettlement Needs report (drafted in mid-2013) anticipates a resettlement target of 8,475 refugees, all non-Syrian, and in the narrative, opens the door to Syrians being resettled in future years 89 The referral system is still not working smoothly as the Government itself lacks the data and capacity to identify Syrian refugees who would qualify for priority resettlement, but everyone is working on practical solutions and the Syrian resettlement pipeline is back up and working again 90 The difference between numbers released for departure and actual departures mainly stems from screening and processing bottlenecks on the side of some resettlement receiving countries, that are expected to be resolved in 2016

48 FULL REPORT shifted their attention and quotas to other countries in the region from which resettlement processing was perceived to be easier. From summer 2015 - with the refocusing of global attention on Turkey and a re-energised resettlement programme in Turkey based upon improved arrangements with the Government, it is widely anticipated that resettlement quotas will return to Turkey in 2016, and that Turkey will become a major contributor to the global resettlement initiative for Syrians. Finding 39. Resettlement is important for maintaining protection space and demonstrating international solidarity, but it will not significantly reduce the Syrian refugee population in Turkey Will resettlement be the primary durable solution in this situation? No. Resettlement will certainly help both Turkey and the Syrian refugees, and the more strategically it is used the better. But in the end, the demographic evidence is overwhelming. Even if UNHCR’s resettlement procedures were drastically streamlined and the processing machinery in Turkey were massively bulked up to process 50,000 or even 100,000 cases a year, this would only keep pace with the natural growth in the refugee population (estimated by the Government to have increased by 159,000 over five years)91 and the rate of new arrivals. Recommendation 10. UNHCR Turkey should increase its resettlement efforts, but any additional spending on resettlement should not be at the expense of ensuring the protection of Syrians who are likely to be staying in Turkey for some time Accountability to Affected Populations Accountability to affected populations (AAP) can be understood as 'an active commitment by humanitarian actors and organizations to use power responsibly by taking account of, giving account to and being held to account by the people they seek to assist' (UNHCR Emergency Handbook). Operationally, AAP is implemented in UNHCR through its Age Gender and Diversity Mainstreaming (AGDM) policy, and through Community-Based Protection. UNHCR participatory assessments The AGD approach introduced in 2004, and the AGD Mainstreaming Policy (2012), provide UNHCR staff and partners with guidance to work in a manner that is inclusive of all groups within a given population of concern. The key operational elements of this approach are "i) ensuring the active participation in UNHCR’s work of diverse and representative groups of persons of concern, using the participatory assessment (PA) methodology and other tools; and ii) identifying, in conjunction with affected individuals and communities, areas where targeted actions are necessary to address inequalities and support the capacities and protection of groups at risk."92 According to UNHCR procedures, country operations should organise annual Participatory Assessment exercises to ensure that concerns and feedback from persons of concern are taken into account in UNHCR's annual programme planning. 91 And a conservative calculation of 2% crude birth rate in a population of 3 million yields 60,000/year 92Age, Gender and Diversity Approach, EC/63/SC/CRP.14

FULL REPORT 49 Finding 40. UNHCR was slow to start participatory assessments of out of camp populations, but did this effectively from late 2014 onwards As far as the evaluation team can determine, in 2013 and 2014 UNHCR Turkey did not lead or coordinate any Participatory Assessments with Syrian refugees.93 At the end of 2014, staff in the Gaziantep Community Services (CS) Unit who were concerned to better understand the evolving nature of the urban caseload organised their own focus groups during UNHCR's Campaign on 16 Days of Activism against SGBV, with emphasis on the topic of early marriage among Syrian refugees. The CS Unit organised twelve FGDs in Gaziantep, Hatay and Sanliurfa, through two UNHCR funded community centres and one community centre funded by an operational partner. This provided UNHCR with important feedback on the causes, consequences and potential solutions to issues of SGBV and early marriage, seen to be on the rise within the Syrian refugee community. Unfortunately, the recommendations and broad strategy generated by this assessment have not been fully implemented as part of UNHCR's programming. Finding 41. UNHCR Turkey used its consultations with refugees as a basis for re-orienting its strategies and programming in favour of the vast majority of refugees in urban areas In 2015, as the need to engage with the urban population became ever more pressing, UNHCR conducted two Participatory Assessments and included a range of partners. This extensive data gathering exercise on UNHCR's part eventually fed into UNHCR Turkey's 2016 planning, and informed the new Urban Strategy in the course of 2015. The Participatory Assessment in March 2015 covered Syrians and non-Syrians, and mobilised 16 multifunctional teams to conduct 40 focus group discussions, 7 semi-structured interviews and 11 in-depth interviews in eight cities across Turkey. The evaluation team was informed that the results of the participatory assessments were shared with national authorities and NGOs in order to inform their policy making and programming. UNHCR also enhanced the coherence of these assessments by contributing to participatory assessments conducted by other organizations and institutions, many of which aimed to cover the main protection gaps in Turkey including self-reliance, coping mechanisms, relations with the host country/host community, and prevalence of harmful traditional practices. Thus, by mid-2015, UNHCR Turkey can be seen assuming leadership on the question of refugee-centred assessment and data gathering, and putting this information to use in its own strategic planning and that of its partners. UNHCR Turkey's Urban Strategy, prepared in spring 2015, demonstrates a strong commitment to incorporating the results of Participatory Assessment and consultation with persons of concern into its strategic approaches and programming for 2016. UNHCR should be congratulated for this effort to re- orient its operations in order to expand its protection coverage and to incorporate the needs and perceptions of persons of concern. According to the Urban Strategy document: "This strategy aims to bring UNHCR’s policies and activities on the protection of persons of concern in urban areas in line with UNHCR’s global strategic objectives and policies, and aims to expand UNHCR Turkey’s protection space through enhanced outreach. Based on the principles and policies of UNHCR,94 and in assessment [sic] of 93 Although reports suggest that AGD Participatory Assessments maybe have been carried out in 2013 with non- Syrians. 94Refugee Protection and Solutions in Urban Areas (2009); Implementation of UNHCR's Policy on Refugee Protection and Solutions in Urban Areas (2012); UNHCR Policy on Alternatives to Camps (2013); Livelihood Programming in UNHCR- Operational Guidelines (2012); UNHCR Tool for Participatory Assessment in Operations (2006); Handbook for Self-Reliance (2005); Urban Refugees, A Community-Based Approach (1996).

50 FULL REPORT the findings of participatory assessments conducted in 2015, this strategy outlines the objectives and activities for UNHCR Turkey in its policy and implementation on a broad range of issues including outreach, community-based protection, livelihoods and self-reliance.”95 Community-Based Protection Finding 42. The community-based protection approach adopted in 2016 seems an efficient way of increasing protection coverage to remote populations As discussed earlier, it became evident over the course of 2014 that protection monitoring of Syrians needed to rebalance between the earlier focus on camps/border points to include out of camp populations. The shifting of resources to out of camp populations continued throughout 2015, although it remained difficult to access rural populations and groups of Syrians in secondary and more remote cities. At the same time, there was a transition in emphasis from case management to institutional capacity development. The intention in 2016 is to embrace the principles and best practices of Community-Based Protection and reorganise protection monitoring on an area basis with mobile multi-function teams working with both Syrian and non-Syrian refugees. This is a logical progression in light of the protracted nature of the Syrian caseload, which over time has evolved such that for practical purposes it can best be supported with assistance mechanisms96 similar to those used for non-Syrians. One important element of community-based protection is increasing Turkish institutional and public awareness of the special mental health and psycho-social needs of Syrian refugees as a specific cultural group. Several UNHCR partners have documented the trauma experienced by refugees before leaving Syrian. In one example of a census done by TRC97 "60% of the participants expressed that they had lost at least one relative in the war with 90% of these were reported to be immediate family members. Furthermore, 70% of the participants expressed that they witnessed clashes, 11% expressed that they actively participated in the clashes. Due to these traumatic experiences, 60% of the refugees’ state that they and their children live in constant fear and psychological breakdown." Finding 43. UNHCR has enabled the design and delivery of more effective psycho-social services to Syrian refugees Within this context, the UNHCR and its partners have been working to try provide mental health and psycho-social support (MHPSS) framed in ways that are understanding of and acceptable to Syrian refugees. According to one partner: "MHPSS services have been an important area supported by UNHCR. Turkish practitioners have a much more clinical approach, whereas UNHCR has helped to introduce approaches that include community-based methods, support groups and a range of activities that may make it easier for Syrians to receive the support they need." Among other initiatives, a good practice in MHPSS is that UNHCR regularly trains partners on appropriate responses and referral pathways for different case types, and in order to improve MHPSS services for Syrian refugees, commissioned a literature review and a study to provide MHPSS practitioners with insights into ways that Syrian refugees 95 UNHCR Turkey Urban Strategy, March 2015, p.1 96 But not yet from a legal or registration point of view, due to the separation of temporary protection from conditional protection in the law 97 TRC Community centre Project Needs Assessment Report, Report No 200, July 2015 p.18

FULL REPORT 51 express their suffering, depression and mental anguish, which might not otherwise be obvious to medical and mental health practitioners. IMC has been a strong implementing partner in the field of MHPSS. Refugee feedback mechanisms Finding 44. Refugee feedback mechanisms are weak in Turkey, partly because the operating context discourages open criticism An important element of AAP are mechanisms to actively seek the views of affected populations to improve policy and practice in programming, and to ensure that feedback and complaints mechanisms are streamlined, appropriate and robust enough to deal with (communicate, receive, process, respond to and learn from) complaints about breaches in policy and stakeholder dissatisfaction. Although we did learn of Government, UNHCR98 and NGO “hotlines”, as well as complaints boxes in camps and in community centres, and we saw some examples of both complaints and responses, this is generally an area of weakness in the Turkey operation. Rather more important, there appear to be very few means whereby refugees can actively participate in the development of policies, plans and programmes that affect them. To a large extent this is beyond UNHCR’s control, as service delivery is in the hands of the Government, access to refugees is logistically challenging, there are real language barriers, and the prevailing management culture does not encourage participatory planning or public criticism. Furthermore, the evaluation team observed that in several locations, UNHCR's offices and operations are generally quite invisible and inaccessible to refugees in Turkey, and direct contact with UNHCR staff is highly restricted. If refugees were experiencing ill treatment, only a few of them would be likely to identify UNHCR as a recourse channel and access assistance. Where Government, UNHCR and partners are somewhat more effective is in providing basic information to refugees through points of service (i.e. Community centres or DGMM regional offices) and via the internet. For example, UNHCR’s Turkey website provides the basic legal and services access information that Syrian refugees need, and a full set of FAQs, in Arabic. UNHCR Turkey’s Facebook page is another vehicle for transmitting information, but neither of these mechanisms is effective for listening to refugees or for dialogue. Figure 4.3 Example of a Frequently Asked Question on the UNHCR website99 Does UNHCR Turkey register Syrian refugees? UNHCR Turkey is not carrying out registration or refugee status determination for Syrians in Turkey, as their protection is ensured by the temporary protection regime. Syrian refugees are registered by the Turkish authorities. UNHCR however supports the Government and humanitarian partners in identifying vulnerable Syrian refugee s with specific protection needs who may require additional/complementary protection interventions. Individuals referred to UNHCR for a protection assessment may be contacted by a UNHCR staff for follow up. A protection assessment is meant to determine the most appropriate solution to your protection needs in the country of asylum. A protection assessment is not a registration process. 98 An estimated 15-20% of refugee emails to UNHCR receive an answer back, 15% for the phone calls: information from UNHCR Turkey 99Frequently Asked Questions, p. 8. The evaluation analyzed the FAQ document in English and has no opinion about the Arabic nor the Turkish translations which are available on the same website.

52 FULL REPORT Child Protection Finding 45. Partly due to lack of access to education, the most serious protection problems facing Syrian refugee children in Turkey are child labour and early marriage During the period under review, UNHCR continued with a case management approach to child protection, in particular identifying and supporting Unaccompanied and Separated Minors (UASMs) in camps and identified through community centres, as well as those picked up by police in the street, and has attempted to conduct Best Interest Determinations whenever UNHCR is aware of UASM specific cases and has access. This task has however been difficult because data on UASMs is not available or not provided to UNHCR, and despite systematic objections from UNHCR, the Turkish authorities at different levels of Government seem to prefer to institutionalise UASMs either in government orphanages or in children’s sections of camps, or sometimes in detention centres (particularly in the context of the 25 July 2014 regulation to prohibit begging). A key UNHCR support has been the provision of assistance in registration of UASMs as well as translation services for Turkish state institutions that receive them. While the situation of UASMs remains a serious concern for UNHCR and continues to be the subject of policy advice, advocacy and training, it can be argued that the more serious systemic protections problem facing Syrian children are the high rate of Post-Traumatic Stress Disorder among Syrian refugee children and youth in Turkey, and family-sanctioned child exploitation in the forms of child labour or early marriage. Regarding PTSD, a 2013 study by Bahcesehir University in Turkey was among the first to document the extremely high rates of PTSD among Syrian refugee girls and boys living in Southeast Turkey. According to this study, nearly half (45%) of Syrian refugee children experienced PTSD symptoms-more than 10 times the rate observed in other children around the world.100 Thus, treatment for PTSD and provision of community-based mental health services adapted to the needs of Syrian refugee children and youth in Turkey must be considered as a protection priority to be included in UNHCR and NGO/Government programming in community centers, outreach initiatives and education. In addition, the evaluation finds that, in part due to the lack of access to education, child labour (most common protection problem for boys) and early marriage (most common protection problem for girls) reflect the socially acceptable ways for Syrian refugee households to deal with the challenges and societal pressures that they face in exile. Finding 46. There is a serious gap in the data regarding early marriage and child labour among Syrian refugees in Turkey Poverty and lack of formal labour access, lack of viable educational pathways and social acceptance of early marriage/child labour are a toxic mix of factors that have ended up placing many Syrian children and adolescents101 into exploitative situations of child labour or early marriage.102 The evaluation team 100 Selcuk R, Sirin and Lauren Rogers-Sirin. The Educational and Mental Health Needs of Syrian Refugee Children, Migration Policy Institute, 2015. p. 12-13 101 Estimates of the incidence of child labour and early marriage vary across a number of Turkish and international studies, surveys and reports. I 102Preventing Conflict, Transforming Justice, Securing the Peace: A Global Study on the: Implementation of United Nations Security Council resolution 1325, p. 72, UN Women (2015); Small Hands, Heavy Burdens: How The Syria

FULL REPORT 53 searched diligently for reliable data on the incidence of child labour and early marriage among Syrian refugees in Turkey. Although there is data for Lebanon and Jordan103 that is presumed to be comparable to the situation in Turkey, and there is data on the incidence of early marriage and child labour among Turkish children, the team was very surprised to find that five years into this huge emergency none of the major child protection NGOs or UN agencies including UNHCR has reliable statistics on child labour or early marriage among Syrian refugees in Turkey. However, the evaluation was able to identify a number of qualitative studies, including UNHCR’s own internal AGDM and office-led focus groups and those of NGO partners, that confirm local perceptions on the part of UNHCR partners and Syrian refugees themselves that early marriage and child labour represent the most significant and pressing child protection problems facing the Syrian refugee population in Turkey.104 Recommendation 11. UNHCR Turkey should work with UN Women, UNFPA, UNICEF and leading NGOs, and in close collaboration with Turkish Government authorities and academic institutions, to conduct a comprehensive study of the “State of Syrian children in Turkey,” with a particular emphasis on collecting information on child labour and early marriage Finding 47. Syrian refugee children in Turkey appear to be at greater risk of early marriage and child labour than when they were in Syria Regarding child labour, it is generally believed that families have been pushed toward child labour as a coping strategy after their savings are exhausted. This is felt to be exacerbated by the conservative religious values of many refugee households inhibiting adult women from working outside the home in situations where they might come into contact with men who are not family members. In this context, and particularly for the estimated 22 percent of households that are female-headed,105even boys as young as nine or ten years old are not seen as 'children' but rather the protectors of their mothers. While UN and western humanitarian organisations are upholding a world view in which children have rights that adults need to protect, in the Turkey context such values and beliefs are not necessarily shared - and indeed it might be seen that it is the duty of male children to protect the rights (and “honour”) of adult women. Tackling issues such as these is not easy, particularly when the host society to some extent tolerates them, but that does not make it less imperative. Early marriage is a particularly serious problem: firstly, because it is clearly an egregious form of SGBV, but also because in many cases these marriages are temporary and/or polygamous and/or unregistered, placing girls at immense health and protection risks, and children borne of these relationships are very likely to be stateless – creating multiple dimensions of exploitation and risk that can be passed along to the next generation. Not only do child labour and early marriage constitute a wholesale removal of children’s rights, but they are a clear reversal in relation to the relatively higher rates of education and Conflict Is Driving More Children Into The Workforce; Save the Children (2015); Syrian Refugees in Turkey: Gender Analysis: Centre for Transnational Development and Collaboration (2015) 103 For example, Too Young to Wed: The growing problem of child marriage among Syrian girls in Jordan: Save the Children: 2014; To protect her honour: child marriage in emergencies – the fatal confusion between protecting girls and sexual violence: CARE: 2015; A study on early marriage in Jordan: UNICEF: 2014; “Because we struggle to survive” – Child Labour among refugees of the Syrian conflict: Terre des Hommes: 2016 104 Among these are UNHCR's 2015 AGDM Participatory Assessment, UNHCR's 2014 Refugee Focus groups on Early Marriage in Gaziantep and the South-East Region 105 AFAD (2013) op. cit.

54 FULL REPORT lower rates of early marriage and child labour that the same refugees experienced while Solutions to the problems they face, as they were in Syria before the crisis. If this proposed by refugees in AGDM focus groups backsliding is to be halted, and if these Syrian children are not to lose an entire "Especially for single women, providing income earning generation,106 then UNHCR needs to work activities from home was proposed. Also promoting safe with partner agencies notably UNICEF and part-time job opportunities for adolescents so that they can UNFPA, and Government authorities, to continue their education at the same time was another design and implement a comprehensive proposed solution from the youth groups. multi-year action plan to tackle these critical For families with children of school age, the need for problems. education incentives and more social assistance is underlined to promote access to education by children in Finally, as UN agencies are the standard general. Promoting the importance of education among bearers for gender equality and women's parents was another suggested solution to increase rights, some partners found it perplexing that enrollment rate and decrease child labour that is stemming from lack of education opportunities..." no UN agency in Turkey had any public response to the May 27, 2015 decision by AGDM Participatory Assessment Report, March 2015 Turkey's Constitutional Court striking down Sec. 230 paragraphs 5 and 6 of the Turkish Criminal Code that prohibit arranging or conducting a religious marriage ceremony without obtaining a civil marriage as well, and that effectively grants religious legitimacy to early marriage without rights. According to one UNHCR operational partner: "In Turkish law, civil marriage registration is the only thing that protects the rights of the woman to divorce, alimony, and child support. For Syrian refugee women and girls, who are tending to see early marriages and second marriages to older Turkish men as a form of social and economic protection, this may have the adverse effect of increasing the number of child brides, and increase polygamous relationships in which young women and their children have no legal rights or recourse.”107 Recommendation 12. UNHCR Turkey should step up its efforts regarding child protection and SGBV in particular combating two forms of child exploitation that are considered to be widespread among Syrians in Turkey: child labour and early marriage. A clear child protection action plan needs to be developed with the Government, UNICEF and other partners, and its implementation needs enhanced coordination and substantial investment from Government line ministries, UNHCR, other agencies and INGOs, as well as from the refugees themselves Thanks to UNHCR's AGDM Participatory Assessments, refugees themselves have been able to suggest a range of solutions, and a number of good-practices and pilot projects are already underway: in both Istanbul and the Southeast, UNHCR has been working the MoFSP and ASAM/social workers to develop conditional cash assistance measures providing cash transfers for refugee children at risk of child labour, exploitation and early marriage, on the condition that their families continue to send them to school. For the time being, such initiatives remain on a limited scale. In Istanbul, another pilot project is a mother- daughter group where Syrian refugee mothers and daughters can share their issues and concerns, and 106The needs and strategy are well described in UNICEF’s “No Lost Generation” initiative http://nolostgeneration.org/about, the problem is that Turkey seems to be lagging behind other refugee-hosting countries in the region 107 Interview with Operational Partner of UNHCR, February 2016

FULL REPORT 55 address the issue of early marriage in the presence of facilitators who can help identify the risks of this practice and alternatives for the families. However, addressing gendered child exploitation needs to move beyond scattered initiatives, and UNHCR and its partners need to work at the same time on awareness- building, legal issues, improving education access (including through conditional cash assistance) and economic opportunities. The evaluation team firmly believes that only a well-designed action plan to address all of these pull/push and social factors will have a chance of breaking the vicious cycle in which Syrian families with adolescents currently find themselves. It is for UNHCR and partners to develop this action plan and turn it into a coherent programme, but suggested elements of such an action plan are captured in the figure below: Figure 4.4 Elements of a Child Protection Action Plan Finding 48. Female-headed households are at particularly high risk of both child labour and early marriage, and should be included in vulnerability criteria for income support Many of the elements of this outline action plan are discussed elsewhere in this evaluation report. What perhaps deserves a little more explanation here is the dimension of economic opportunities. There is no doubt that Syrian parents and children are making an economic calculation when children marry early or go to work: and to address this the economic push factors needs to be addressed. One aspect of this is to ensure that households have enough adult breadwinners to remove the economic incentive to child exploitation – but this might not be possible or sufficient in all cases. Hence the need to complement

56 FULL REPORT employment-related initiatives with others that either compensate families for keeping their children in school (conditional cash transfers of the type used in Turkey’s domestic programmes to combat child labour), or that simply provide income support to families through unconditional transfers that target families with no income and with children at an age where they are at risk of child labour or early marriage. This logic suggests that families with this structure, and in particular low income female-headed households with adolescent children, should be added to the vulnerability criteria for future generations of cash and e-voucher programmes SGBV and gender dimensions of the response Gender analysis and advice With regard to gender-appropriateness of programme and protection responses, it is important to note that globally, UNHCR has reduced the use of gender specialists and eliminated gender focal-points in favour of mainstreaming gender analysis throughout its operations. In theory, in line with UNHCR's age, gender and diversity mainstreaming approach, all UNHCR staff are now responsible and in some way accountable for addressing differential access to protection, assistance and the enjoyment of rights on the basis of age, gender and diversity. In practice, the evaluation team found that UNHCR staff and partners, particularly those in the field, feel the need for more guidance and support to appropriately address issues around gender equality, protection and participation. Finding 49. UNHCR staff and partners informed that team that they need more guidance on gender equality in the particularly complex social and economic context of Turkey Although UNHCR Turkey has shown some degree of organisational commitment to the AGDM approach (see above), UNHCR does not appear to have a considered and articulated gender analysis and a gender- equality approach to guide its strategic and programmatic efforts. Instead, too much is being left to individual staff judgement, with conflicting analyses, interpretations and limited guidance provided from higher levels (MENA and HQ). In the words of one UNHCR staff member: "On a range of issues related to gender and sexual and gender-based violence, including domestic violence and early/forced marriage, staff are very divided and torn as to the best approach on specific cases. Some believe that is best to take the 'culturally sensitive approach' understanding that some of these practices, such as early marriage were brought with them from Syria. Others believe we should take a more 'legalistic approach', to seek to enforce the law because Turkish law has clear provisions on dealing with child marriage and other SGBV issues.108 Even when we approach those in MENA or HQ for guidance on how to deal with specific cases we can get different answers to the same situation." In a second example of the need for guidance, in a focus group discussion with a mixed group of field, protection and community-based protection staff, there was lively debate as to the extent to which the strategy of never mixing men's and women's refugee representative groups was really working, or if it would not be appropriate to bring men's and women's groups together to find joint solutions to some 108 Marriage in Syria is legal at aged 16 – so there is a discrepancy between Syrian and Turkish laws Syrian refugees might not be aware of

FULL REPORT 57 issues. According to one staff member: "Men are listening to the opinions of male religious leaders, and women are listening to female religious leaders. Sometimes they are listening to different messages and so they are coming at questions of SGBV and child protection from different angles. Maybe it is time that we bring them together to exchange views and understand where each other is coming from." On this issue, other team members disagreed. Another staff member expressed her uncertainty about how to deal with specific protection issues in the following manner: "One of the main protection issues that we face is that of child or early marriage. In general, if we can avoid the legal approach, we try to 'do no harm' - so if the girl is 16 and the boy is 18, and provided the girl has consented and is encouraged to remain in school, then the cost of pursuing a legal solution seems to outweigh the benefits...But what about when the girl is 15 and the boy is 25? Or the girl is 14 and the man is 40? Sometimes it is hard to see how to pursue the best solution...”109 While early marriage is frequently flagged as a leading protection risk and is seen as a form of SGBV by UNHCR staff, this practice is only the visible tip of a much bigger complex of beliefs, behaviours and inequalities of opportunity, resource ownership, mobility and decision-making that Syrian refugee women and girls in Turkey are experiencing. While the AGDM framework is useful, its implementation in Turkey would benefit from some technical support from HQ and other experienced parties. Both the 2014 and 2015 COPs refer to supporting IPs and NGOs to utilize an AGDM approach in their planning, and training sessions were given to the staff of the Harmonization Department of DGMM especially focusing on participatory assessment. But despite all these efforts our review highlights that there is no shared and articulated age and gender analysis, or reflection on best practices regarding the gender challenges of protection, programme and policy dialogue for Syrian refugees in Turkey. Finding 50. Many individual UNHCR and partner staff are gender aware, but in the absence of a strong and shared gender analysis linked to a gender strategy, activities to reduce age gender and diversity gaps are fragmented and many opportunities for coordination and leverage are lost Through interviews of UNHCR and their partners we found that there is a high level of individual gender awareness of staff both at central and field levels. But individual awareness and analysis does not easily translate into an operational approach unless such is facilitated and made systematic. For example, the evaluation team met with the Provincial Directorate for Women's Affairs in Gaziantep. This government unit had opened all its services to Syrian refugee women, including women's shelters, and was itself seeking partnerships to analyse the issue of early/child marriage among the local refugee population. With the support of UNICEF and the University of Gaziantep, the Provincial Directorate was initiating a study on early marriage as the basis for developing a response. Although UNHCR’s partners (ASAM and HRDF) collect sex disaggregated data in their Community centres, the statistical analysis of gender issues is limited to an over-simplified analysis of differences by sex. While sex-disaggregation is a first step of gender analysis, it is not sufficient. There remains a critical need to assess, analyse and reveal social roles, social treatment and differentials such as access to services, division of household tasks, domestic violence, different access to and control over resources, as well as gender disparities in employment, education, literacy and age of marriage. 109 Evaluation team interview with UNHCR staff

58 FULL REPORT Many informants110 suggested that a careful analysis of the barriers that Syrian young girls and women face should be conducted. According to one respondent to the evaluation survey: "As the number [of refugees] is increasing unexpectedly, protection needs and challenges are increasing as well. The targeted community needs to be assessed and evaluated carefully to identify the gaps and the needs, in order to have a better response and prevention in a timely manner before getting difficult to cope with. Women may not be able or [may be] reluctant to express what kind of protection problems they have. This also concerns the vulnerable, and the disabled as they are invisible in the community." Recommendation 13. UNHCR Turkey should work with MoFSP, UN Women, UNFPA and academic institutions to conduct a country-wide age, gender and diversity analysis to underpin the 3RP and provide the foundations for a Gender Strategy integrated within the Protection and Solutions Strategy, that in turn can frame more effective action plans for Community-based Protection, Child Protection and SGBV Sexual and Gender-based Violence In Turkey's urban areas,111 UNHCR and its partners are working within the dense institutional network of Turkish government health, education and social services that are designed to address domestic violence, early marriage and other common forms of SGBV within Turkish society. Turkey’s comprehensive legal framework on prevention and response to SGBV also covers refugees and asylum-seekers, and refugees who are survivors of SGBV are able to benefit from response mechanisms within the framework of the law including access to legal aid services, health services, safe shelters and psycho-social support. If refugees are not accessing these services it is because they do not know they have access, the Turkish institutions do not know that refugees have access, the Turkish institutions do not have enough capacity, or refugees have language and other social barriers to access. UNHCR’s support for SGBV during the evaluation period was mainly provided through case management by implementing partners in urban community centres. The community centres provide a range of services including information dissemination, referrals, and legal and psychosocial counselling. In addition, UNHCR also increased its cooperation with Bar Associations, and as part of its capacity building activities UNHCR included SGBV and the national legal framework on SGBV in other training activities with national counterparts including DGMM and AFAD. Partners reported that simple things, like UNHCR's investment in the training and provision of women Arabic-Turkish interpreters to police stations and hospitals to accompany victims of domestic violence or abuse, and the training of social workers and receptionists at the community centres, were some of the most valuable ways to assist victims of SGBV. 110 Interviews with UN partners, Implementing and Operational partners and UNHCR staff 111 AFAD and TRC together with other government departments directly provide counselling services in camps

FULL REPORT 59 Finding 51. UNHCR Turkey has been effective in addressing a small number of reported SGBV cases, but has not placed sufficient priority on addressing the systemic causes of SGBV and strengthening the capacity of Turkish SGBV response and advocacy bodies The limitations of the case-management approach to SGBV are three-fold. First of all, it is a relatively small number of refugees who have access to community centres at all. Secondly, there were reported inconsistencies in how cases were handled,112 as well as reports of weak internal coordination within UNHCR.113And third, the case-management approach does not tackle prevention and the systemic issues underlying the prevalence of SGBV as reported to INGOs and to UNHCR in their various participatory assessments. UNHCR’s Participatory Assessments have revealed consistently that there is a widespread tendency for refugees themselves not to report domestic violence - nor for government officials to respond to them, and that the exploitative practices of child labour and early marriage are widespread partly because they are generally tolerated by refugee families and by Turkish institutions. In this circumstance, more needs to be done by the Government of Turkey and UNHCR, in association with all stakeholders, to tackle the root causes of SGBV and child exploitation among refugees in Turkey. There are four reasons why it seems to the evaluation team that SGBV and Child Protection have been addressed only partially and late in the situation: (a) these aspects of protection are a shared responsibility between UNHCR, UNICEF and UNFPA, who have been quite slow in coordinating their own efforts,114 (b) UNHCR does not have a strong and established relationship with the main counterpart Government Ministry MOFSP (which itself does not see refugees as their priority), (c) UNHCR in Turkey was hard-wired for a case-management approach to refugee protection – as a result of which a few individual cases of SGBV and child abuse received specific attention,115 but the systemic issues were insufficiently addressed, and (d) issues of SGBV, domestic violence, trafficking, child labour and early marriage are genuinely difficult issues to address in the social and political context of Turkey. Conclusion In order to bring some coherence and focus to protection, it is recommended that UNHCR conduct three foundational studies/needs assessments, and develop strategies and action plans, as recommended earlier in this report. Many of the key elements are already in place, but there are some important missing pieces and the various elements need to be brought into a coherent whole in order to avoid duplication and confusion, as well as to allocate scarce resources efficiently. 112 For example, there was confusion regarding how to handle cases of early marriage where the girl was over 16 – the legal age of marriage in Syria but not in Turkey 113 For example, there was an IP agreement approved by UNHCR Ankara to support a network of women’s centres in Sanliurfa, without consulting or informing the protection or community services teams in either Ankara or Gaziantep 114 There are few references to SGBV and Child Protection coordination in records of coordination meetings, a national level working group on SGBV was only created in early 2015, an SGBV working group was started late in Gaziantep, and as far as we can determine there is no mechanism for Child Protection coordination 115 UNHCR’s Turkey SOP for SGBV is detailed and case-specific, and as far as the evaluation team could ascertain in the few instances where SGBV cases have been identified by community centres or camp visits they have been appropriately referred for counselling and downstream services – but these instances are only handfuls

60 FULL REPORT To this end, the evaluation team recommends that UNHCR consider the following system of analyses, strategies and plans, that together we feel would enable UNHCR Turkey to address the serious protection concerns of refugees in Turkey more effectively. In the following schematic, those components that are already in place (albeit in need of updating and harmonising with the others) are signalled with a red check mark (). In the opinion of the evaluation team it is important that the Urban Strategy and Gender Strategy both be integrated (as chapters for example) of the Protection and Solutions Strategy. Also, the proposed Action Plans could each be subject to a costed annual workplan (through the COP). The need for a Strategic Communications Action Plan is discussed later in this report. Recommendation 14. UNHCR Turkey should adopt a more structured approach to needs assessments, analyses, strategies and action plans, thereby facilitating priority-setting and the addressing of key analytical gaps concerning child protection and SGBV Figure 4.5 Elements of a Comprehensive Protection and Solutions Strategy

FULL REPORT 61 5 Education Education is a basic human right and provides an important entry point in emergencies for reaching the most vulnerable children, youth and adults. Schools, especially primary and secondary schools, can provide a protective environment for children and youth, allowing them to feel that they are safe, able to live normal lives, and to resume personal growth. Schools also give structure to everyday life and hope for the future. In addition to basic education, non-formal, vocational as well as tertiary education are important avenues for refugees to acquire skills and knowledge for living healthy, productive and self- reliant lives. Education is an essential component of protection and livelihoods strategies. Education approach in Turkey UNHCR’s (Global) Education Strategy116 takes a two-pronged approach: first is an emergency response that provides immediate education opportunities and safe learning spaces for refugee children in camps as soon as possible. The second approach is to promote medium to long-term education policies and strategies that will build on the education system of the host country, and strengthen government’s capacity to meet the educational needs of refugee children. In the case of Syrian crisis that is now in its fifth year, UNHCR has been encouraging partners and government to do long-term planning, while also remaining prepared for an emergency response in case of possible new influxes.117 As a matter of policy, UNHCR prefers “integration of refugee learners within national systems where possible and appropriate,”118 and has been pursuing this policy in Turkey.119 Because Turkey does not use Arabic as a medium of instruction, this has led UNHCR to place a major emphasis on supporting Syrian children to access Turkish schools by supporting the legal and policy changes to facilitate access, and by providing Turkish language training to students, material assistance for Turkish schools, as well as guidance and support to Turkish teachers who are in some cases struggling to provide services to Syrian students. 116UNHCR’s Education Strategy 2012-2016 http://www.unhcr.org/protection/operations/5149ba349/unhcr- education-strategy-2012-2016.html 117UNHCR’s public reporting http://reporting.unhcr.org/node/2976 118 UNHCR’s Education Strategy op. cit. p 8 119 The evaluation team’s attention was also drawn to a key UNHCR policy decision of EXCOM 1987, which emphasises preservation of cultural identity: “47 (o) Reaffirmed the fundamental right of refugee children to education and called upon all States, individually and collectively, to intensify their efforts, in co-operation with the High Commissioner, to ensure that all refugee children benefit from primary education of a satisfactory quality, that respects their cultural identity and is oriented towards an understanding of the country of asylum”, echoed for example in the EXCOM resolution of 2007 on Children at Risk. Neither of these, nor other EXCOM resolutions examined, is explicit on the preferred language of educational instruction

62 FULL REPORT Finding 52. Thanks to the concerted efforts of UNHCR and UNICEF, and the generosity of the Turkish government and people, Syrian school-aged (6-17) children have the right to educational services delivered through Turkish state schools as well as through temporary education centres Specifically, UNHCR, together with UNICEF and other partners, has advocated for a series of policy changes by the Government, including most importantly the Circular 2014/21 that regularized access to education by Syrian school-aged (6-17) children. The circular ensures that foreigners under Temporary Protection have access to educational services delivered through Turkish state schools as well as through temporary education centres (TEC), an alternative system of schools set up with substantial support from UNICEF only for Syrian refugee children, and teaching in Arabic using a modified version of the Syrian curriculum (see more on this below). UNHCR’s education programs are built around three major principles: access, quality and protection.120121 These principles uphold the minimum standards of the Inter-Agency Network for Education in Emergencies (INEE), and these were the principles used to design education programmes for Syrian refugees.122123 The provision of educational services in Turkish public schools and temporary education centres is the result of a partnership between the Ministry of Education (MONE), UNICEF, UNHCR, and other donors. While MONE is primarily responsible for the coordination and supervision of these services, UNICEF and UNHCR provide technical and financial support. For example, MONE consulted with both agencies on the development of Circular 2014/21. UNICEF has provided technical assistance for the registration and monitoring of Syrian students in the MONE database (known as YOBIS), contributed resources for the construction of temporary education centres, and provided Syrian volunteer teachers in temporary education centres with financial incentives and training. Since April 2015 this has been supplemented by UNHCR-provided teaching materials to MoNE-recognised TECs inside and outside camps.124 5.1.1 Early Childhood Education and Care UNHCR, through its implementing partners, is supporting Child-Friendly Spaces (CFS). These are not designed for Early Childhood Education and Care, but are primarily intended as safe havens for children in emergencies, and safe places for parents to leave their children when necessary. Most CFS offer Turkish language courses, catch-up classes, art and play activities, and organise social events such as national day celebrations for refugee and host community children. CFS were supported by UNICEF and UNHCR in 120Refugee Education: A global Review, 2011 Geneva- UNHCR (Dryden-Peterson,2011) 121UNHCR Education Strategy 2012-2016 122Education of Syrian Refugee Children Managing the Crisis in Turkey, Lebanon and Jordan(Culbertson & Constant, 2015) 123An independent evaluation of UNICEF’s response to the Syrian Refugee crisis in Turkey 2012-2015, Final Report Nov.2015 – UNICEF, Darcy James and et.al 124Human Rights Watch (2015). “Preventing a Lost Generation: Turkey – Barriers to Education for Syrian Refugee Children in Turkey”, USA: p 17:

FULL REPORT 63 Istanbul, Gaziantep and Sanliurfa.125 The quality and appropriateness of CFS need to be monitored.126 It is strategically important for UNHCR, however, to explore additional ways of supporting mothers and families with very young children, helping them to better care for their children’s health and education. Collaboration with UNICEF and other organisations on the ground to integrate early childhood education and care into non-formal education interventions is a “sure start” in this regard. Turkish Language Training Finding 53. Turkish language training for employment, and academic Turkish language training for university students, are particularly efficient and effective Learning Turkish is crucial for Syrians to attend public schools, to move on to higher education, to get employment, and generally to lead productive lives in Turkey. UNHCR, in collaboration with MoNE and partners, has supported various Turkish language training programs in informal, community or NGO-run facilities. For example, in 2015 UNHCR provided Turkish language courses to approximately 100 men, 900 women and 400 children in Language Training Centres in Sanliurfa.127 In addition, 6,750 Syrians participated in social, language and life-skills activities. In 2015, UNHCR established two dedicated Turkish language teaching centres in SE Turkey to enable Syrian children to integrate in Turkish schools.128 Learning beadwork in an Istanbul UNHCR also works closely with TÖMER (a Turkish language community centre (UNHCR photo) and cultural training institution) to enable promising students to learn enough Turkish to gain access to university. In partnership with the Presidency for Turks Abroad and Related Communities (YTB), a Turkish government organisation responsible for international students, UNHCR has offered 1,600 advanced Turkish language scholarships to high school graduates. Students who are interested in studying in Turkey and have demonstrated academic potential are admitted to the 10-month programme with little or no prior knowledge of Turkish. Vocational Training Finding 54. Vocational training is limited and not well connected to the job market UNHCR, through its implementing partners, supports the government in providing limited vocational and skills training to Syrian youth and adults to enhance their employment opportunities and self-reliance.129 125Asylum Information Database (May 2015) ``Country Report: Turkey’’ p.74 126As observed during interviews, the physical conditions of CFS as well as appropriateness of activities need improvement in most cases 127Asylum Information Database (May 2015) ``Country Report: Turkey’’ p.74 128Interviews with MoNE and UNICEF. 129Interviews with UNHCR Education Officer, Government officials (Ankara, Gaziantep, Maraş)

64 FULL REPORT Through its implementing partners and in particular through community centres, UNHCR provides a limited range of life skills training to Syrian youth and adults, to enhance their employment opportunities and self-reliance. With the possible exception of the sewing training in camps that is coordinated by the Government not by UNHCR, for the most part this training does not lead to technical skills certification and is not directly connected to a job market. Beyond the life skills training provided in community centres, UNHCR advocates for effective use of existing vocational education opportunities offered by MONE and the Turkish Employment Agency (IŞKUR). However, in order to access these Syrian children learning Turkish programmes, refugees need to have the information in the (UNHCR photo) first place, and at least intermediate level Turkish. Furthermore, MoNE training programmes, unlike IŞKUR’s technical and vocational training programmes, are not geared towards employment and the labour market. Noting the added vulnerabilities of female- headed households and the risks of early marriage, all vocational training actors should ensure equal access for girls and boys. Higher Education Finding 55. UNHCR has provided unprecedented support for tertiary education, although not nearly enough to meet the enormous needs In recognition of the important role that higher education plays in strengthening human capacity and building community resilience, the Government of Turkey has waived tertiary education tuition fees for Syrian students and provided 1,000 full scholarships to Syrian refugees. For its part, UNHCR Turkey has introduced the Albert Einstein German Academic Refugee Initiative Fund (DAFI) scholarship programme, offering over 80 scholarships for Syrian students since 2014. The DAFI programme is implemented in partnership with YTB. For 2016 the number of DAFI scholarships rose dramatically to 1,000 over the period 2016-2019,130 the highest of all DAFI programme countries, and this is matched by YTB with another 1,000 scholarships. Though relatively small in relation to the needs, such measures are clearly improving lives for those individuals and their families that have been able to access these services. UNHCR is also in discussion with YTB to transform the existing language scholarship programme into a more structured university preparation programme that will combine language training, academic support and counselling on university admissions procedures. As YTB reported, the Government is aiming at providing higher education to 40,000 Syrian students. This calculation is based on the Syrian rate of university enrolment before the war, which was about 25%. The estimated number of tertiary school age Syrians is around 160, 000, and 25% of this number makes 40,000. Similarly, for vocational training, particular attention needs to be paid to ensure that women have equal access in this environment of strong gender stereotypes. 130 In 2015 there were 5,803 Syrian applicants for 80 DAFI scholarships, the highest number of DAFI applications ever received

FULL REPORT 65 Education coordination Finding 56. Coordination for education at national and local levels is not well organised, with incomplete participation and insufficient attention to joint planning Coordination of education has not always been easy, and takes place at different levels. MoNE chairs a Working Group on Education and UNHCR is an active member although the group has not met since November 2015. This working group is intended to serve as the major platform among government and UN Agencies for identifying and advocating on matters related to the education of Syrian Refugees, but unfortunately it does not have NGO members. At the Provincial level MoNE, through its Provincial Education Commissions (re: Circular 2014/21), organises Provincial Action Plan meetings supported by UNICEF. UNHCR is “invited” to these meetings,131 but given UNHCR’s intention to retain a focus on education in 2016 and beyond, it would be important for UNHCR to become a permanent member of these commissions. And in Gaziantep, UNHCR and UNICEF co-chair a Working Group on Education with open membership but participation primarily by international NGOs in the region. The major purpose of this working group is to create a platform for information sharing and joint planning. However, partners have criticized the working group on two major grounds: first it is not felt to be inclusive enough, and does not seem to welcome local NGOs; and second, it remains limited to information sharing, and does not lead to joint needs assessment, planning and action.132133 The major coordination issue has however been around the respective roles and approaches of UNHCR and UNICEF (see Coordination Chapter above), which are to some extent also rooted in different expectations of how long Syrians would stay in Turkey. From the outset, these two organisations have followed fundamentally different education strategies in Turkey. In line with the Convention on the Rights of the Child134 and the Core Corporate Commitments in Humanitarian Action,135 UNICEF has consistently advocated for and substantially supported education in Arabic (mother tongue) using a modified Syrian curriculum: an approach that would be well-suited to a short asylum period. As we have seen, UNHCR’s policy is to integrate refugee children into the host country’s public schools, and in the host country language, implying an expectation on the part of UNHCR of a longer stay in Turkey. UNHCR’s rationale for mainstreaming refugees into national education systems is based on five arguments: (a) it encourages government to assume responsibility for refugee protection and rights as outlined by relevant conventions; (b) it provides certification to refugees through accredited examinations; (c) there is greater quality assurance of teaching and learning through a national system; (d) it provides opportunities to promote social cohesion between refugees and national children; and (e) it is more sustainable: investment in existing systems strengthens partnership with all education actors 131Handover note of Education Associate in Gaziantep (Oct.2014-Feb. 2015) 132Interviews with partners 133 For further comments on disconnects between Government and UNHCR coordination mechanisms see Chapter 4 above 134 As per CRC-Article 30 (Children of minorities/indigenous groups): Minority or indigenous children have the right to learn about and practice their own culture, language and religion. The right to practice one’s own culture, language and religion applies to everyone; the Convention here highlights this right in instances where the practices are not shared by the majority of people in the country. http://www.unicef.org/crc/files/Rights\_overview.pdf 135http://www.unicef.org/publications/files/CCC\_042010.pdf

66 FULL REPORT for increased access and quality.136Similarly, UNHCR also encourages the use of the curriculum of the host country,137 as it is generally the most sustainable and protective option in the medium to long term.138 Given that the average length of refugees staying in a host country is around 17 years, and Syrian refugees have already been in Turkey for 5 years, UNHCR’s approach seems pragmatic and sustainable. Finding 57. The longer Syrian refugees stay in Turkey, and the more the Turkish government system gears up to provide education to Syrians according to their own directives and guidelines, the stronger becomes the argument for UNHCR’s preferred approach of Turkish medium instruction in national schools UNICEF and UNHCR have recently agreed on an explicit division of labour regarding education for Syrian refugee children in Turkey. In this division of labour, UNICEF is responsible for pre-primary, primary and secondary education, while UNHCR is responsible for Turkish language training, non-formal and vocational, technical education, and tertiary education. Both organisations will be involved in policy development and strategic planning in collaboration with the government and other partners (e.g. ILO, IOM, and NGOs). Although this division of labour was more ad hoc and not agreed in consultation with MoNE officials, MONE seems to accept this approach. Also, given the likelihood of Syrian refugees staying for the long term in Turkey, and the prospect of limited additional donor funding, UNICEF is currently considering opening up more options139that include mainstreaming into state schools. Education performance Finding 58. The rate of primary and secondary school enrolment among Syrian refugees in Turkey is approximately 35%140 While recalling for the readers that there is a fundamental problem of data on Syrians in Turkey, the best estimates available141on educational enrolment are presented in the following table: Description Number Notes Estimated number of school aged Syrian refugee 782,829 34.2% of refugee population of 2,291,900 persons children142 Number of children enrolled in Turkish schools 55,360 Data supplied by MoNE143 (Grades 1-12) 136EDUCATION: Issue Brief 4, July, 2015 Geneva-UNHCR 137 With the important addition of instruction in the refugees’ own language and culture, with a view to conserving cultural identity and facilitating eventual return to the country of origin 138EDUCATION: Issue Brief 3, July, 2015 Geneva, UNHCR 139 Interview notes 140 Consistent also with a Turkish Government estimate of 30% 141 UNHCR’s Briefing note: Education access for refugee children in Turkey Feb-2016 (internal) 142 Numbers of school-aged children are estimated based on numbers of persons registered with Turkish authorities. As of November 2015, there were an estimated 756,000 school-aged Syrian children in Turkey 143 This represents significant progress compared to the 4,242 refugee children attending school as reported by UNHCR at the end of 2014

FULL REPORT 67 Description Number Notes Number of children enrolled in temporary 78,707 Over 90% of the school-age population of camps. education centres in camps Data supplied by MoNE Number of children enrolled in temporary 144,823 Data supplied by MoNE education centres in communities Total number of children in formal education 278,890 Includes both Turkish schools and TECs Percentage enrollment (Grades 1-12) 35.58% Consistent with UNHCR reporting from end 2015 (camp and communities) (44% primary school enrollment) Finding 59. TECs are vital in the short term, representing 80% of primary and secondary enrollment in 2015 Finding 60. Education enrolment is by far highest in camps Finding 61. Education enrolment drops off sharply after grade 4 Percentage of eligible children Distribution of Syrian students in school in Govt schools (June 2015) 100 60 52.3 t n 40 31.3 50 e c r e 20 9.8 P 6.6 0 0 Camps Out of camps <1 1-4 5-8 9-12 Grade levels % in TECs % in Govt schools Finding 62. Unless education services improve access and quality, significant increases in school attendance are unlikely In general, the lack of sufficient and adequate learning spaces and teachers represent the major barriers to scaling up access to education across the Syrian emergency.144 But beyond enrolment limitations, the truth is that we do not know anything about the educational achievement of refugee students in Turkey, because neither attendance nor attainment are systematically tracked by MoNE.145146 Furthermore, education of girls remains a particular challenge. There are several reasons for low school attendance and early drop out among Syrian children, and particularly among girls. They include families’ 144No author (2015) “3RP Regional Progress Report- June 2015”, p19-20: 145 Foundation for Political, Economic and Social Research (SETA) (2015) “Turkey’s Syrian Refugees – Toward Integration” p 24: 146 “When I Picture My Future, I See Nothing": Barriers to Education for Syrian Refugee Children in Turkey: Human Rights Watch: 2015

68 FULL REPORT lack of knowledge of available options, low prioritization of education over other spending, and dependency on children’s income. In the case of girls, as discussed in greater detail earlier in this report, early marriage, in some cases to older, wealthier men, is seen as a coping strategy for vulnerable refugee families, and as a way to bring economic stability and improved social status to the family. Although education is free in state schools, there is an associated cost that is often born by the parents, and TECs (especially in Istanbul and other cities) charge tuition fees. This can tip the scales of economically disadvantaged Syrian families. Language proficiency is another important barrier to enrollment in Turkish schools, particularly for older children. Additionally, a recent study by the World Bank lists the following reasons for poor access to education: (a) the high degree of mobility of the Syrian population, which exacerbates school dropout; (b) high levels of psychosocial trauma, which disrupts concentration; (c) difficulties in retaining Syrian teachers—most are unable to register for work permits and are paid modest stipends; (d) the lack of quality control of services provided through Community Based Education services; and (e) overcrowding, damage, and disruption to Turkish schools where double shifts are in place. In the context of Turkey, with aspirations to access new European funding, the Government is currently preparing a comprehensive plan to fulfil unmet needs. The education component of this plan has been prepared by a Task Force set up by MoNE. UNHCR is part of this Task Force, and can use this as an opportunity to promote quality, accessible and protective learning opportunities for all Syrian refugees.147 Recommendation 15. (a) UNHCR Turkey should work with UNICEF and MoNE to prepare a comprehensive action plan for refugee education that would (a) be based on a situation assessment and analysis of the learning needs and expectations of Syrian children (which could be included within a report on the “State of Syrian children in Turkey” as recommended elsewhere); and (b) include a tripartite agreement on educational approaches, including use of curriculum and languages of instruction, with the Government of Turkey Recommendation 15. (b) In conjunction with Recommendations (12) and 15 (a) UNHCR should work with UNICEF, MoNE and MoFSP to scale up existing efforts to keep both girl and boy refugee children in school. This could involve a combination of providing quality education opportunities, with community advocacy to prevent early marriage and child labour, and conditional cash assistance to compensate at- risk families for keeping their children in school.148 147In the medium to long term, UNHCR needs to consider that all refugees in Turkey should be able to benefit from such services 148This combination has been used successfully in Turkey’s domestic programmes to combat child labour, and piloted by ASAM and other partners with MoFSP and education authorities

FULL REPORT 69 Conclusion Finding 63. UNHCR’s staff capacity and education programming allocation are not sufficient to meet the priority needs in this sector that is so pivotal for protection, social cohesion and sustainable livelihoods On education, there were unfortunate inefficiencies resulting from tensions between UNHCR and UNICEF in the early part of the Syria response, which “diminished the joint advocacy and influencing potential of the two organisations [and] produced among other actors the impression of the UN investing time and effort on contesting each other, rather than working together.”149 However, these tensions seem to have been largely resolved in 2015 through an agreed division of labour. Looking ahead, the evaluation team concluded that the education sector is one that needs significant further investment by UNHCR.150 Education is more than a right in itself; in the Turkey context, it is clear that education is the key to reducing the incidence of early marriage and child labour, to social cohesion, and also to sustainable livelihoods. In order to be efficient in this context, UNHCR first needs to staff up its education capacity in-country, both in Ankara and in the field offices. Secondly UNHCR should focus upon its agreed operating space within the agreed division of labour: notably higher education, non-formal education, and Turkish language training - aspects of education that are not being covered by other UN agencies. This is an area where UNHCR should identify specific institutional and policy bottlenecks, pin down a few areas where a strategic investment can leverage greater returns, and then deliver on those specific activities at scale. Recommendation 16. In support of this comprehensive education action plan, UNHCR Turkey should prioritise education according to the agreed division of labour by scaling up its staffing and its programming for non-formal education, Turkish language training and higher education. In order to facilitate the inclusion of refugees in government schools, UNHCR should also increase the provision of school transport, conditional cash assistance linked to education in order to support children at particular protection risk, and supplies for refugee children in government schools 149Independent Evaluation of UNICEF’s response to the Syrian refugee crisis in Turkey 2012-2015, November 2015 P.44 150 A new €10 million project with the Lifelong Learning Directorate of MONE, financed by the European Commission and starting in 2016 will provide a welcome boost to UNHCR’s ability to implement its education programme in Turkey

70 FULL REPORT 6 Social Cohesion It is incumbent upon UNHCR to be tracking, monitoring and addressing the risk of social tensions and potential for conflict between refugees and their host communities. During the course of the evaluation, the evaluation team spoke both with UNHCR and its partners - government, academics and NGOs - about social cohesion, and what measures UNHCR has taken to address risks of social conflict. This chapter of the report looks at several related aspects of this question, including managing public perceptions about Syrian refugees, engagement with municipal authorities, refugee representation, support for host communities, the bridging role of community centres, cultural appropriateness, and finally, the promotion of sustainable livelihoods for refugees. Beyond media monitoring, the evaluation team could find little evidence that UNHCR had in place a system for tracking social tensions between refugees and host communities during the period under review, although there is an expectation that the 2016 move towards community-based protection and the 2015 Urban Strategy will begin to address this gap and progressively put in place a framework for identifying, monitoring and addressing social tensions, sector-by-sector and host-area by host-area. UNHCR staff as well as DGMM generally expressed a glossy view that social tensions were not a significant issue, and indeed most expressed surprise at the high level of social cohesion and harmony. Interlocutors tended to ascribe the apparent high level of social cohesion to the fact that Turks in Southeast Turkey and Syrians from North Syria share a common cultural heritage and numerous extended family connections, and do not really see themselves as 'different' except for the differences in language.151 This view is also reflected in the sections of the TPIR concerning “harmonisation” (the term used by the Government in preference to “integration”) and in the mandate of the Harmonisation Division of DGMM,152 which is focussed on explaining the applicable laws, how refugees can access services, and on orienting refugees to life in Turkey. Finding 64. UNHCR’s partners are less optimistic about the risks of social conflict than UNHCR staff, and feel UNHCR should be proactive This perspective was not shared by UNHCR's implementing partners and some municipal governments, who point to Turkish opinion polling that shows opposition to further Syrian arrivals and Syrian residency,153 and who consider that UNHCR should be doing more to identify the danger signs that indicate when and where social tensions could suddenly flare up. According to one municipal government partner: "the risks of social tensions are always there, and need to be carefully analysed. If you want to know what the triggers for such tensions are, you need to analyse the vulnerabilities of each refugee hosting area. In Gaziantep, the problem of housing and high cost of rent has always been an issue, even before the refugee influx. So it is clear that issues around availability and cost of housing can provoke local conflicts and tensions between host and refugee communities. In Kilis, they have a hospital built to serve 100,000 … and now there are 200,000 including the Syrian refugees. So, in Kilis, access to healthcare can be a sudden point for conflict and social tensions. Somewhere else it could be transport that is the problem. Each 151 Although the evaluation team was not able to visit the Kurdish-speaking refugee hosting regions, the degree of social cohesion is thought to be even higher between the two cross-border Kurdish speaking populations 152 http://www.goc.gov.tr/icerik/harmonization\_917\_1066 153 For example, Turkish Perceptions Survey; The German Marshall Fund of the United States: 2015

FULL REPORT 71 municipality in Turkey has its vulnerabilities that are likely to be where tensions arise, and the important thing is to address the risk factors before they come to the boiling point. It is important to hold monthly press conferences to dispel false notions that can be put out there in the media, that somehow refugees are a threat or a major problem. It is important to set the record straight..."154 There have been several well-publicized incidents of violence between Syrians and Turks. There are also anecdotal reports of Syrian children being harassed, discriminated against and bullied.155Friction points seem to be: increasing rents, decreasing wages, increasing job competition, longer wait times for hospital services, and the rise of polygamy and crime.156 But how far these underlying concerns translate into active social tension is difficult to gauge, and it has been argued that even when tensions are real they are less likely to manifest as open conflict as long as the Government maintains a firmly pro-Syrian refugee stance.157 UNHCR has put in place a series of activities aimed directly at promoting social cohesion, for example Turkish language training and cultural orientation, activities to bring communities together for religious festivals and national day celebrations, and the recent creation of a number of "peace-building officer" positions in community centres, whose jobs include organising activities for refugees and Turkish citizens to interact and get to know each other. In the 2015 Urban Strategy, UNHCR Turkey commits that "advocacy will be conducted with Municipalities at the local level for the inclusion of persons of concern to their assistance schemes and to promote the role of Municipalities in enhancing social cohesion with the local community through social and cultural activities." In Istanbul, there is a promising pilot to take this one step further (in 2016) and to create mixed District level committees of Syrian and Turkish representatives to address challenges of co-existence issues. The concern expressed by UNHCR partners is that these activities are too small scale, too scattered, and not strategic. In particular, they are not enough to cope with expected increase in stressors in 2016 as the Turkish economy continues to struggle and Turkey prepares to receive asylum seekers back from Europe. Strategic communications A key component of enhancing social cohesion is to frame the way that Syrian refugees are perceived in Turkey. As one interviewee put it succinctly, unless UNHCR and its allies get out in front of the media and public opinion, in Turkish, then refugee perceptions by the Turkish public will be shaped by others who are less informed - and who might have different objectives. Especially in Turkey, where the emergency is large and complex but information is also in short supply, there is a premium on having a proactive and well-resourced strategic communications function – a regular and predictable flow of analysis and data packaged in a form that is readily digested and used by stakeholders.158 154 Interview notes 155 World Bank. Turkey's Response to the Syrian Refugee Crisis and Road Ahead, December 2015, p. 9 156 Brookings Institution and USAK, 2013; ORSAM, 2015a; HUGO, 2014 157 A leading proponent of this “ticking time bomb” view is Bazac Yavcan, see Governing the Syrian Refugee Crisis Collectively: The View from Turkey; 2016 158 One senior Turkish interlocutor very specifically asked that UNHCR not disseminate key information simply by directing partners to a website, but that UNHCR make the effort to push out periodic and relevant e-mails directly to key stakeholders, with key information and especially analytical studies or lessons learned that can help stakeholders improve their response

72 FULL REPORT Finding 65. UNHCR Turkey did not have an adequate communications strategy at a time when communications needed direction and purpose Currently the information that is available in English, Turkish and Arabic on three different websites159as well as on Facebook and various corporate and personal twitter accounts is difficult to navigate, some components are out of date, and in general the emphasis is on three aspects of communications: (a) reflecting UNHCR corporate messaging (i.e. celebrity activity or the release of agency reports), (b) information about unmet Turkish needs interspersed with stories about UNHCR activities in Turkey, mainly with heavy UNHCR visibility branding for fund-raising purposes, and (c) information in Arabic to help refugees understand their legal and service delivery context. The information is quite UNHCR-centric, and does not appear to be framed by a strategy that gives direction and purpose to communications. One dimension of public perceptions to be addressed is the portrayal of Syrians as “guests”, as victims, as needing charity. This will be sensitive because at the outset this image of the Syrian refugee was actively encouraged by Government messaging and is rooted in conservative Muslim ideology, which sees Syrian refugees as benign but dependent foreigners. While the “charity approach” is itself worthy and has greatly benefited the Syrians so far by driving the massive public spending on camps and the outpouring of community and municipal charitable donations, the welcome is wearing thin. As time goes on, the scale of the refugee influx and the realisation that it will not be ending soon have tested the limits of charity and revealed that it is not sustainable. Instead, what is needed rather urgently is the elaboration of and advocacy for a new paradigm where Syrians are seen as economic actors, neighbours, and contributors to society. Changing public perceptions is not easy or quick. It needs a clearly defined plan developed in close concert with Government and other stakeholders, particularly shapers of domestic opinion such as academics, parliamentarians and civil society. It needs to mobilise a wide range of channels and in the current context to have a big focus on social media and journalists. And it needs resources: resources to develop successful images and messages in Turkish, resources to engage with stakeholders to disseminate those messages, resources for training, and resources for partners to actively mount professional and sustained information campaigns. Recommendation 17. UNHCR Turkey should work with its partners to develop a Strategic Communications Action Plan to underpin the Protection and Solutions Strategy as recommended elsewhere, with a primary emphasis on supporting social cohesion, and a secondary emphasis on fund-raising Elements of such an Action Plan could include four different target groups, each with specific messages and in language media, along the lines of Figure 6.1 below. Two of the target audiences should be donors (globally and their Turkey representatives), and the other UN agencies (as discussed in Chapter 4): 159 UNHCR HQs/Global Focus, UNHCR Turkey and the Turkey pages of the 3RP