



# PROMISE TO PRACTICE

Following through on commitments to support the future of Syria and the region

## **Signatory agencies:**

### **NGO Platforms**

Jordan INGO Forum (JIF)  
Lebanon Humanitarian INGO Forum (LHIF)  
Syria INGO Regional Forum (SIRF)

### **Individual Agencies**

Arcenciel  
ABAAD  
Action Against Hunger (ACF)  
ActionAid  
Akkar Network for Development  
Al Majmoua  
Act for Human Rights (ALEF)  
Amel Association International (Amel)  
Basmeh w Zeitooneh  
Bibliothèques sans frontières  
Catholic international development charity (CAFOD)  
CARE International  
Caritas Lebanon  
Caritas Switzerland  
Christian Aid  
Development for People and Nature Association (DPNA)  
Dorcas  
Danish Refugee Council (DRC)  
Finn Church Aid  
Human Appeal  
International Rescue Committee (IRC)  
Lebanese Center for Human Rights  
Lebanese Organization for Studies and Training (LOST)  
Makassed Association  
Makhzoumi Foundation  
Médecins du Monde (MdM)  
Mercy Corps  
Norwegian Refugee Council (NRC)  
Oxfam  
People in Need  
SAWA for Development and Aid  
Save the Children  
SHEILD Association  
Syrian American Medical Society (SAMS)  
Syria Relief and Development  
Tabitha  
Union of Relief and Development Associations (URDA)  
Youth for Development  
World Vision International

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Eduardo Soteras / DRC

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## INTRODUCTION

The conflict in Syria has created the largest displacement crisis in well over a generation, possibly since the second world war. Six million people remain displaced internally, more than five million are registered as refugees in neighbouring countries and over a million more have fled to Europe or elsewhere. Despite a moderate increase in return of mostly internally displaced people in 2017, the last year saw three newly displaced Syrians for every person who returned home.<sup>1</sup> The recent escalations of violence in Idlib and Eastern Ghouta dramatically underline the point that Syria's conflict, and the ordeal for its civilians, is far from over.

The international community has made significant financial and political commitments to address the massive scale of this crisis, in particular through two major conferences, held in London in 2016, and Brussels in 2017. A follow up conference will be held in Brussels on 24-25 April 2018.

Last year's Brussels conference saw pledges of US\$6 billion, and a further US\$3.7 billion for 2018-2020. This funding has meant millions of people inside Syria can access humanitarian assistance. It has supported refugees and poor host communities, as well as the governments in neighbouring countries who have shouldered much of the response. It remains as vital as ever.

Furthermore, donors and host countries at these conferences adopted a "comprehensive approach" to responding to the refugee crisis. They made commitments to attempt to ensure refugee families and the poor communities that host them can access work and education. These commitments aimed to create 1.1 million jobs in the region, for example, and ensure all refugee children were in school by the end of the last school year. They subsequently recognised the importance of giving refugees legal protection in order to achieve these goals, and the need for resettlement of vulnerable refugees and other safe and legal pathways beyond the immediate region.

Yet, as the Syrian crisis enters its eighth year, the lives of many of the five million refugees in neighbouring countries have seen little improvement, and the number of refugees offered resettlement has actually fallen since the commitments made last year.

This reports details the commitments made in previous years and tracks their implementation. It then offers specific recommendations for those gathering this year for the second conference on "Supporting the Future of Syria and the Region" in Brussels, to ensure the ambitious and comprehensive approach is translated into real changes in the lives of refugees and vulnerable communities in Lebanon, Jordan and Turkey. The stakes are high: failure to follow through on or properly fund these commitments would carry serious consequences, including many people returning to Syria before it is safe to do so.

Importantly, 39 aid agencies and 3 interagency bodies call on the conference to reaffirm that the conditions for the safe, voluntary and dignified returns of refugees, in accordance with international law, are still not in place.<sup>2</sup> We also call on participants to agree to an accountability mechanism, based on international best practice, to ensure that the necessary funding pledges are disbursed and the ambitious policy pledges committed to at the first Brussels and London conferences are implemented.

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1 Norwegian Refugee Council, Save the Children, et al (2017) *Dangerous Ground: Syria's Refugees Face an Uncertain Future*, <https://www.nrc.no/globalassets/pdf/reports/dangerous-ground---syrias-refugees-face-an-uncertain-future/dangerous-ground---syrian-refugees-face-an-uncertain-future.pdf>

2 European Union press release (2017), 'Supporting the future of Syria and the region: Brussels Conference – 5 April 2017' <http://www.consilium.europa.eu/en/press/press-releases/2017/04/05/syria-conference-co-chairs-declaration/>

**The conference's participants should:**

- **Reaffirm their commitment to the principle of non-refoulement:**
  - The Brussels outcome document should reaffirm that the conditions for the safe, voluntary and dignified return of refugees are not in place and that previous commitments must be implemented to avoid incentivising premature returns.
- **Create an accountability mechanism and process for commitments made at the forthcoming and previous conferences on supporting Syria and the region. This should include:**
  - Key indicators to measure improvements in the conditions of refugees and poor host communities, as well as humanitarian and development financing, and resettlement. Each commitment should have key tasks, measures, milestones and deadlines for its implementation.
  - Open, inclusive and participatory reporting and periodic reviews, conducted with the active engagement of refugees and vulnerable host communities – including children and marginalised groups - and civil society. These reviews and reports should form the basis of forthcoming high level conferences on the Syria crisis.
- **Provide sufficient funds and economic incentives in a timely and transparent manner:**
  - Donors should pledge and commit to the timely disbursement of multi-year funding to support vulnerable crisis-affected communities in the region, improving aid organisations ability to develop sustainable approaches. This means following through on the multi-year aid funding committed to at the London and first Brussels conferences.
  - Donors must continue to extend and expand bilateral and multilateral support to Syria's neighbours, so that refugee and vulnerable host community can access the services and assistance they need.
  - Donors and host governments should simplify the way NGO development and humanitarian projects are approved so they can be implemented swiftly.
  - UN agencies should make the planned and actual allocation of un-earmarked donor grants more transparent so funding for NGOs becomes easier to predict.
- **Commit to make appropriate policy changes based on this report's recommendations so that refugees in Jordan, Lebanon and Turkey get access to education and protection, and have the chance to earn a living. There should also be commitments to improve access to health services in neighbouring countries.**
- **Commit to** resettlement or other forms of humanitarian admissions for vulnerable refugees equal to 10% of the population of refugees in neighbouring countries.

## COUNTRY PROFILES

### Jordan

The Jordan Compact, signed in 2016, was a bold move to try and “*turn the refugee crisis into a development opportunity*”.<sup>3</sup> It brought new financing and policy changes to spur Jordan’s economic growth and benefit both refugees and Jordanians, including increasing Syrian refugees’ access to education. At the Brussels Conference in 2017, the needed to secure a protected status for Syria’s refugees in Jordan was recognized, when both the international community and Jordan renewed their commitment to “*deliver holistically and mutually on the obligations set out in the Compact*”.<sup>4</sup> Two years on, Jordan can boast some progress, but the hoped-for benefits for refugees have not fully materialised and the scale of the needs of Syrian refugees remains staggering.

#### Livelihoods

Jordan deserves credit for delivering on aspects of the Compact, especially at a time when it faced its own economic difficulties. It was reclassified from an upper- to lower-middle income country in the summer 2017. Unemployment for Jordanians increased from 14.6% in 2016 to 18.5% at the end of 2017 – and 27.5% of Jordanian women are jobless. Even before the conflict in Syria and the refugee crisis the absolute poverty rate for Jordanian families was 14.4% in 2010, with women and children most affected.<sup>5</sup>

But even so, Jordan eased the restrictions on work permits for refugees. The government lifted the burdensome application fee and simplified the application procedures by only requiring refugees to present their MOI card and a passport photo. It also de-linked work permits from a single employer in the agriculture and construction sectors and allowed refugees to obtain permits through cooperatives or a trade union, instead of relying on a sponsor. Syrian refugees have also more recently been granted the right to change sectors and employers once their permit expires, without the consent of their current employer.

However, the implementation of these new policies has been uneven: some refugees have reported being asked to cover their potential employer’s social security costs when applying for a work permit and to pay for other expenses that would usually fall on the employer. The legal framework still imposes barriers to Syrians’ access to formal work. The vast majority of sectors continue to require a sponsor, which disincentivises refugees. Refugees are still excluded from high-skilled and semi-skilled jobs. In restaurants, food processing businesses and retail, mandatory sector-quotas for non-Jordanians prevent employers from formalising the majority of their Syrian staff. While many Syrian refugees have strong entrepreneurial skills, the government has not created a regulatory framework that enables the registration of Syrian businesses, and it remains opposed to refugees’ home-based businesses. This is particularly damaging for single Syrian women, for whom running a home-based business is one of the only “culturally appropriate” options to earn a living.

3 Government of Jordan (February 2016) The Jordan Compact: A New Holistic Approach between the Hashemite Kingdom of Jordan and the International Community to deal with the Syrian Refugee Crisis

4 Supporting Syria and the Region, Brussels Conference (April 2017) Annex: Supporting Resilience of Host Countries and Refugees in the context of the Syrian crisis

5 Jordan Department of Statistics

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I started my own soap making business after receiving a business grant. I am divorced and I am trying to start over, and this new business is helping me become independent and provide for my family. I dream of having my own shop one day.

Khadijah, a Syrian refugee living in Mafraq, Jordan



The Government of Jordan announced that a total of 83,507 permits had been issued to Syrian refugees as of 31 December 2017. This includes 7,926 from Azraq, 4,419 from Zaatari camp and 599 in Emirati Jordanian Camp in 2017, giving them greater freedom of movement and helping many of them escape life in a refugee camp. However, only 4% went to women and many of them are renewals of previous permits. It is estimated that only 40,000 Syrian refugees currently have valid work permits; leaving the government a long way from reaching its target of 200,000 permits by 2019. The reasons cited by Syrian refugees to justify the low uptake in work permits are low wages, long commutes and poor working conditions. Syrian women are driven further away from formal work by the lack of transportation to the workplace, disproportionate responsibility for unpaid and domestic work, a lack of culturally appropriate employment opportunities, and limited or no childcare options.

Most significantly, the work permit targets have not been meaningfully complemented by entrepreneurship pathways, job creation, revenue generation and overall economic benefits for Syrian refugees. As a consequence, evidence shows that refugees often remain dependent on humanitarian aid, unemployed, or prefer to work informally, relying on a “portfolio of work” to meet their family’s needs.

This all prolongs the cycle of poverty, with worrying consequences for refugee children who have to work to meet a shortfall in household income or because their caregiver can’t secure a work permit.<sup>6</sup> This has grave implications for their education.

Finally, although the EU trade concessions have been put in place, other barriers appear to be preventing companies from taking advantage of the relaxed Rules of Origin. Only three firms have applied to export to the European market thus far. This has raised questions about whether the changes to the rules of origin have provided as dramatic an incentive to investors as Compact planners assumed. Tariffs waived by the European Union are not large enough to change the intentions of many investors, and Jordan is less competitive than other countries in terms of labour, inputs and export costs. Furthermore, the Special Economic Zones have failed to attract Syrians: poor working conditions, low wages, and the distance and cost of transportation have been prohibitive for the majority of refugees living in urban settings.

So despite some significant progress and the relaxation of the regulatory framework, there is some way to go before the Compact is successfully implemented. It will require both Syrian workers and their potential employers to be better incentivised.

## Education

The Jordanian government has introduced a number of inclusive policies to boost the school enrolment rate of Syrian refugees. It ran double shifts – both morning and afternoon sessions - for Syrian refugee children in 209 schools in Jordan. It allowed refugee children who had missed the beginning of the 2016-17 school year to enroll during the second semester. And it set up a ‘grace period’ in September 2017,<sup>7</sup> enabling all children to enroll in schools in Jordan, regardless of their nationality or documentation status.

6 CARE (Oct 2017) Seven Years into Exile: How Urban Syrian Refugees, Vulnerable Jordanians and other Refugees in Jordan are being Impacted by the Syrian Crisis

7 The grace period allows time (the 2017/18 school year) to properly establish the child’s identity and residency documentation, so that all children can have the chance to go to school, regardless of their nationality or documentation



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I have been in Zaatari Camp for around three or four years. There are nine people in my family – I have six brothers and sisters and we live with my parents. My dream is to become a lawyer so that I can protect the children here. Education is important for us to be able to pursue our dreams and I am going to try my best to become a lawyer. My last grade in maths was 93%. My best subjects are maths, Arabic and science.

Deena, 9 years old, a Syrian refugee living in Zaatari Camp, Jordan

By the end of the 2016-17 academic year, 126,127 out of 212,000 registered Syrian refugees of school-age (6-17 years) were enrolled in Jordan's formal education system.<sup>8</sup> This meant 40% of Syrian school-aged children in Jordan remain out of school – missing the target set by the Compact by 65,000 children. Of the 50,000 public school places newly allocated in 2016-17, less than half were taken up by refugee children;<sup>9</sup> studies repeatedly identify the lack of space in schools as one of the main barrier to registration.<sup>10</sup> At the same time, the grace period has been unevenly applied across schools and some children are still refused enrollment into school due to lack of documentation.

Critically, the underlying barriers to universal school enrolment in Jordan remain: underlying poverty, unaffordable education and the cost of transportation. Syrian families frequently face economic hardship and have to send their children out to work, rather than school, to make ends meet. Many simply can't afford the costs of giving their children an education.<sup>11</sup>

Refugee children who have been out of school for a long time – either because there were fewer education opportunities at the beginning of the refugee crisis or because barriers to education were more important at the time – struggle to enroll in formal education. They rely on non-formal education, or do not go to school at all. As of December 2017, certified non-formal education (namely, the 'Drop Out' and 'Catch Up' programmes)<sup>12</sup> had reached nearly 10,000 children. Non-certified informal education and learning support services had been provided to 110,768 children this year, a substantial increase since the beginning of 2016. Drop-Out programmes for children aged 13-18 will expand across the country in 2018, giving thousands of children and young people access to accredited education.<sup>13</sup>

The Jordan Compact does not address the serious issue of school drop-outs. Research shows that 68% of out-of-school Syrian refugee children in Jordan were at one point enrolled in education and have since dropped out.<sup>14</sup> Some of the main reasons cited were the quality of teaching, the learning environment and violence at school. For the past two years and to its credit, the Government of Jordan has worked to increase the quality of education. By the end of 2017, 7,452 teachers, facilitators and school staff were trained to provide psychosocial support, use child-centered approaches and teach life-skills. A National Centre for Curricula Development was also established in early 2017 to promote the development of educational materials and the continuous improvement of the curricula.

However, the formal education system remains overburdened, with particularly serious consequences for refugee children. They are mainly educated during what are known as 'second shifts', which means they only have 20 hours of instruction per week, compared with 30 hours per week for children in the 'first shift'.<sup>15</sup> The second shifts are also staffed by contract teachers who are both less qualified and less well supported in terms of pay, training and benefits. Segregated

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8 JRP 2018-2020

9 In the school year 2016/17, an additional 24,542 Syrian boys and girls were enrolled in formal education, JRP 2017-19

10 UNICEF (2017) Running on Empty II

11 ODI (2017) A Promise of Tomorrow: The effects on UNHCR and UNICEF Cash Assistance on Syrian Refugees

12 The Drop Out programme aims to provide positive educational opportunities, achieve behavioural change, and give young people the knowledge necessary to enrol in vocational training opportunities or home-school and Catch Up programmes. It also enables students to sit for placement tests to re-enrol in formal education in the public school system

13 UNICEF (2017) Demand-Side Barriers to Education Presentation

14 UNICEF (2017) Running on Empty II

15 Human Rights Watch (2016)



shifts, overcrowded classes, limited teacher training and the lack of a system-wide strategy to address violence in and around schools is also leading bullying and the use of corporal punishment.

The Jordan Compact set ambitious enrolment targets for 2016 and 2017, but this focus on access has detracted from the need to improve quality and increase student retention. The Jordanian government is using an online Education Management Information system to track all school-related data, including attendance, but double-shift schools need more technical support in data collection and entry. The government is also working with UNESCO to develop a national education strategic plan with performance indicators and a budget. It is crucial that this plan and any additional commitments to the Jordan Compact include learning quality and outcomes as a measure of success.

## Protection

Since the signing of the Jordan Compact and to implement with the commitment made at the first Brussels conference to *“review registration and documentation processes to increase the number of Syrian refugees legally registered with the Ministry of Interior (Mol)”* the Jordanian authorities have made it simpler for a certain category of Syrian refugees to access Mol cards, and reduced some of the cost of accessing civil documentation. The government has introduced measures to make access to birth certification (mainly for Syrian children born in Jordan) and marriage certification easier – reducing the risk of statelessness and unregistered marriage. Yet securing status remains a real challenge for refugees. They report facing multiple bureaucratic impediments, the inconsistent application of policies in different governorates and police stations, and even the risk of detention when trying to regularize their situation.

The process of delivering new Mol cards is progressing steadily. As of December 2017, 403,332 refugees were registered in host communities. It is thought that 110,331 Syrian refugees have not yet completed their Mol registration or been able to meet the requirements to update it.<sup>16</sup> Without valid registration, Syrian refugees face major barriers to legally stay in their place of residence, access public services – including essential health services and humanitarian assistance – or register births, deaths and marriages.

Below the surface of ‘registration numbers’ lie important protection concerns for refugees, including restriction of movement – travelling around their neighbourhoods, let alone the country, is strewn with obstacles, such as police checkpoints, random checks, raids and workplace inspections. They are also at risk of forced deportation or forced relocation to camps.

In 2015, the government of Jordan suspended the bailout system that used to allow refugees to leave camps through a sponsorship procedure and update their registration with UNHCR and the Mol in host communities. In a positive step, the Government of Jordan and UNHCR announced in early March 2018 the beginning of a ‘regularisation process’, which will allow any Syrian national that left refugee camps before 1 July 2017 or who arrived in Jordan through informal borders and did not register with UNHCR to regularize their status. However, it should be noted this process will only last until September of this year. With the continued suspension of the bailout system, there is presently no legal way for refugees residing in camps to leave to live in host communities – save for limited cases of family reunification or long-term medical treatment that is unavailable in the camp.

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16 Jordan INGO Forum (Jan 2018) The Situation of Syrian Refugees in Jordan: Protection Brief 2018

A woman wearing a purple headscarf and a black dress is smiling and holding up a piece of leopard-print fabric with red Arabic text. In the background, several other pieces of patterned fabric are hanging on a line. The setting appears to be a simple room with a television and some furniture visible.

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Once my daughter's birth certificate and identification papers are issued I will feel better. She is not recognized, and soon will have to attend school, so she needs the certificates to access the services.

Haneen, a Syrian mother living in Azraq Camp, Jordan



Clarity from authorities about the amnesty and the opportunities for refugees to regularise their status is vital. In the meantime, unregistered refugees remain at risk of forced relocation to camps, particularly Azraq. More than 25,600 involuntary relocations to Azraq camp have been recorded since it opened in April 2014 – 44% of the registered camp population.<sup>17</sup> Within Azraq, 8,580 Syrian refugees remain stranded in an area surrounded by a barbed wire fence and known as ‘Village 5’ (V-5). What was supposed to be at its creation in 2016 a temporary secure transit camp for refugees has still not been dismantled and many refugees have been there since 2016. Its residents, considered to be potential security risks, they’re prevented from moving into the unfenced parts of Azraq until they’re subject to a screening process that has proven long, tedious, opaque and inconsistent.<sup>18</sup> Even when they’re cleared to leave V-5, they can’t get permits to leave the camp altogether. In 2017, 734 refugees were also involuntarily relocated to V-5 from Zaatari refugee camp and host communities, raising increasing concerns of the area’s use as a detention facility.<sup>19</sup>

In addition, there was a spike of summary deportations to Syria between the end of 2016 and mid-2017. Jordanian authorities deported about 400 registered Syrian refugees a month, the majority being whole families, including children.<sup>20</sup> The authorities justified these deportations on the grounds of national security. But few deportees reported being aware of the reason for such measures and none received legal assistance to defend themselves. They were not heard by a judge, or allowed to communicate with their relatives or UNHCR.

In a dramatic shift after the Compact was signed, Jordan closed its borders in June 2016, following a suicide attack at the border in Rukban. The move left 40,000-50,000 Syrians – 70-80% of whom were women and children – trapped in a demilitarised zone called ‘the berm’.<sup>21</sup> These civilians are not only unable to exercise their right to seek asylum but are also enduring dire conditions and a lack of food in informal tented settlements. Access to healthcare in ‘the berm’ is extremely restricted: 2017 saw only 671 referrals to Jordanian hospitals from Rukban, with the patients being sent back once discharged.<sup>22</sup> The Jordanian authorities have dismissed more sustainable solutions involving the provision of aid from Jordan or asylum into Jordan and have instead pushed for aid to be delivered cross line from aid agencies in Damascus, which has yet to materialise.

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17 Ibid

18 Jordan INGO Forum (Jan 2018) Syrian Refugees in Jordan: A Protection Overview

19 Ibid

20 Human Right Watch (Sept 2017) I Have No Idea Why They Sent Us Back: Jordanian Deportations and Expulsions of Syrian Refugees

21 UN data (Dec 2017)

22 UNHCR. Additionally, the clinics operated 12,845 consultations for acute and chronic health conditions throughout the year

## Health

In November 2014, the Jordanian government understandably stopped the provision of free healthcare for all, due to the heavy strain on public health services. Instead, it allowed registered Syrian refugees to pay the same health fees as uninsured Jordanians, subsidising up to 80% of the total cost. The government later passed a decree to ensure free ante- and post-natal care and family planning for Syrian refugees with a valid Mol card.

But in a worrying development, the government introduced a new policy in February 2018 which obliges every Syrian to pay the 'foreigner's rate'. These costs, already imposed on unregistered refugees, are prohibitively high for Syrian refugees. They represent a substantial increase on the previous subsidised rates (from two to five times more expensive depending on services and structures).<sup>23</sup> This policy carries particular risks for women of reproductive age, as a caesarian-section will now cost up to 700 Jordanian dinars (US\$986) compared to 200 Jordanian dinars (US\$282) in 2017. Assessments show that 74% of Syrian households in host communities cited the cost of healthcare as the most significant obstacle preventing them from receiving care for chronic diseases.<sup>24</sup> Even families receiving cash assistance report it is not enough to meet their basic needs, especially for individuals with chronic illness, war injury or disability.<sup>25</sup>

This 'foreigner's rate' policy will have devastating consequences on Syrian refugees' access to health, which has continuously deteriorated since 2016.<sup>26</sup>

## Conclusion

Jordan has made great strides in welcoming Syrian refugees. The international community should commend it for doing so and continue funding the response and the Jordan Compact. That support, however, has to be more than just financial. A frank dialogue needs to take place between the government and its donors on the numerous protection issues that Syrian refugees face, and on lasting obstacles to decent living conditions. The prevailing narrative that portrays Syrian refugees as only a burden to Jordanian host communities also needs to change. Finally, both Jordan and the international community should undertake a critical review of the Jordan Compact. The review should acknowledge and address the persistent political barriers, and revisit success indicators so they genuinely capture the improving situation of Syrian refugees.

23 Except for vaccination, which is free for all nationalities. The Ministry of Health does not publish its prices. Estimations are based on Amnesty International's (March 2016) *Living on the Margin: Syrian Refugees in Jordan Struggle to Access Healthcare* and on health INGO cost comparison

24 UNHCR (Dec 2016) *Health Access and Utilization Survey: Access to Health Services in Jordan among Syrian Refugees*

25 CARE (Oct 2017) *Seven Years into Exile: How Urban Syrian Refugees, Vulnerable Jordanians and other Refugees in Jordan are being Impacted by the Syria Crisis*

26 CARE (Oct 2017) *Seven Years into Exile: How Urban Syrian Refugees, Vulnerable Jordanians and other Refugees in Jordan are being Impacted by the Syria Crisis*. Access to healthcare has declined since 2016, with 58% of Syrian respondents reporting that they had used hospitals/clinics in the last six months, down from 77% in 2016.

## Recommendations

While acknowledging the many positive steps taken, donors and the government of Jordan should undertake the following steps to improve the design and implementation of the Jordan Compact:

### Livelihoods

- Stimulate the **creation of new enterprises and promote the growth of existing ones** by:
  - incentivising and promoting business-formalisation processes, especially by simplifying procedures and improving access to credit
  - promoting self-employment opportunities for Syrian refugees through the gig economy and other freelance work that allows for flexible hours and choice, and by extending the recently announced home-based business instruction to Syrian refugees, allowing them to open and register home-based businesses.
- Accelerate **efforts to reduce informal work** by reducing work-permit restrictions, creating more flexible quotas in the service sector, and expanding the sectors and professions open to refugees. Labour conditions in the formal job market should also be improved and better scrutinised by the Ministry of Labour.
- Expand **new trade access policies to qualifying firms outside Special Economic Zones and closer to urban hubs**, which agree to meet the requirement of employing at least 15% of refugees by year one and 20% by year two.
- Introduce **diversified targets to include micro-economic indicators of household welfare**, such as increased in household income, improved retention rates and the opening up of additional sectors to Syrians. Particular attention should be given to gender with specific indicators assessing both Syrian and Jordanian women's engagement in livelihoods programmes.

### Education

- Continue to **expand access into the formal education system and certified non-formal learning opportunities whilst strengthening quality** by addressing the space shortage and expanding school coverage in priority areas, as well as investing in teacher training, remuneration and benefits.
- Address livelihoods and protection barriers through **better coordination across sectors** by:
  - expanding child-sensitive social-protection programmes, including providing conditional cash transfers to increase school attendance and retention, and improve parents' access to long-term livelihood opportunities
  - improving unregistered refugees' access to services through a consistent application of the regularisation process and an enhanced Urban Verification Exercise.
- Help schools and the Department of Education to **use the eEducation Management Information system** to better manage school enrolment.

- Increase the accountability and efficiency of the education strategy by **making learning outcomes and quality the measure of success**, and by including refugees in the national education strategic plan.

#### Protection

- Make **registration procedures easier** for Syrian refugees in host communities by allowing those who have not been able to re-register with MoI or UNHCR to do so, particularly those who left the camps without going through the procedures. There should also be a periodic review of the ongoing urban verification exercise and the potential regularisation process.
- Ensure **due process is respected** in cases of deportation and forced relocation to camps, and provide anyone at risk of deportation to Syria with the opportunity to access legal support.
- Expedite the screening of Village 5 residents in Azraq camp, with **clear and transparent screening procedures communicated to refugees**. Ensure refugees already screened out of Village 5 are granted the same rights to movement and work as other camp residents.
- Alleviate suffering for the population of concern residing at the north-eastern border (berm) by **upholding their right to seek asylum and ensuring their access to humanitarian assistance and support services**, including by making sure more people can access the nearby clinics.

#### Health

- Delay the implementation of the new policy so that all **health providers can prepare financially and logistically for a change** in health coverage.
- Establish, with the collaboration of health partners, **a list of life-saving care that will remain covered** as per the previous policy.



## Lebanon

The outcome statement by the government of Lebanon and co-chairs at the Brussels Conference in 2017 built on earlier commitments in London to respond to the needs of vulnerable people affected by the Syrian crisis. It included easing the regulatory framework for refugees living in Lebanon. While several steps were taken in 2017 to improve refugees' access to legal residency, civil documentation and services including education, the commitments have yet to fully translate into action. Refugees still lack the protection they need, and some have faced municipal restrictions, including evictions and expulsions. Access to employment remains extremely difficult for the poorest Lebanese. The Lebanon Crisis Response Plan (LCRP) appeal was just 45% funded by the end of 2017, with some significant delays in the disbursement of funds until late in the year.

### Livelihoods

The Vision for Stabilization and Development that the Lebanese government presented during the 2017 Brussels Conference, emphasised the need *"to intensify efforts geared to support job creation for the most deprived communities, including refugees"*. Since 2015, over 50,000 people and 1,824 small businesses have benefitted from livelihoods interventions, including vocational training, undertaken as part of the Lebanese Crisis Response Programme (LCRP). However, the number of jobs generated and retained is much lower. In 2017 there were just 2,000 jobs generated or retained, 3,200 people provided with temporary employment and 2,000 received training for the skills they need to help them earn a living. This is three times more jobs created or retained than in 2016, yet these efforts only scratch the surface of meeting the scale of the need. Livelihoods remains one of the most underfunded sectors of the LCRP, despite the increased attention the issue received at both the London and Brussels conferences.

Access to employment remains extremely difficult for the poorest in Lebanon. The unemployment rate among the heads of vulnerable Lebanese households assessed by the National Poverty Targeting Programme (NPTP) is 51%. Almost 106,000 Lebanese households are living below the poverty line (\$3.84/day). Nearly one-third of them – 35,000 households – live in absolute poverty (below \$2.4/day) and are targeted by the NPTP. Recent estimates<sup>27</sup> suggest that there is a Syrian labour force in Lebanon of approximately 384,000 people, of which about 30% are employed. However, two-thirds of these worked less than 15 days per month. The labour force participation rate of Syrian women is very low at about 7.6%. Overall, 90% of households have either no working member or only one, who is in charge of providing for their entire family.

In February 2017, the Ministry of Labour decided to set an employment ratio of no more than one foreign worker per 10 Lebanese workers.<sup>28</sup> The employment restrictions on refugees were intended to protect the Lebanese labour force, but they have put downward wage pressure on both Lebanese and non-Lebanese workers. They have also forced refugees to adopt harmful coping strategies to meet their basic needs.<sup>29</sup> Syrian refugees' lack of legal residency or status

27 Lebanese Crisis Response Programme (2018), livelihoods chapter, quoting the International Labour Organisation manuscript, Quantitative Framework for Access to Work for Syrian Refugees in Lebanon

28 Variations of this rule include in cleaning companies (ratio of 10 foreign workers per one Lebanese), in construction companies (one foreign worker per one Lebanese), and for agricultural foreign workers who work for individuals (5,000m<sup>2</sup> of land per foreign worker).

29 LEADERS Consortium (January 2017) Competency Needs and Skills Gap Analysis of the Private Sector in Mount Lebanon, Tripoli and the Bekaa. See also International Labour Organisation (2014) Assessment on the Impact of Syrian Refugees in Lebanon and their Employment Profile

A woman wearing a brown hijab and a white lab coat is looking through the eyepiece of a white and black microscope. She is wearing white gloves on her hands. The background is a blurred laboratory setting with various equipment.

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I am trying to learn as much as possible so as to have the chance of being a full-time employee in the near future. I am currently training to become a lab technician to help my husband support the family.

Lina, a Syrian mother living in Zahle, Lebanon

has put them at the risk of exploitation in the workplace and increased the prevalence of child labour. To provide for their families, refugee women have increasingly had to take on new responsibilities – often working in the informal market at higher risk of harassment and violence, with limited legal redress.

Refugees in formal sponsorship agreements are also exposed to exploitation, often incurring substantial informal costs with practically no legal protection. A positive development in September 2017 saw Syrians allowed to enter a new sponsorship agreement without having to return to Syria before they could change their sponsor. However, sponsors' obligations are rarely enforced and refugees from Syria have no way of protecting their rights through legal redress. NGOs found that sponsorship posed specific challenges for refugee women: they are less likely to have direct relationships with host-community employers and landlords, and families can prioritise the legal residency of male breadwinners over women.

Recent studies have found that child labour is on the rise: nearly 30% of Syrian households had working children under 16, while the proportion of working Lebanese children has increased from 2% pre-crisis to over 6%.

The Lebanon Roads and Employment Project –intended to generate jobs – has been approved under the Global Concessional Financing Facility. However, no funding has yet been disbursed. The government's Capital Investment Plan will be presented to donors for investment at the upcoming CEDRE Conference, which will be held in Paris in April 2018.

## Education

To create more spaces for refugee children in formal schools, Lebanon's Ministry of Education and Higher Education (MEHE) opened 376 schools offering a second shift, of which 350 schools remain open and operating at capacity. Despite these efforts, 58% of the 488,832 Syrian school-age children (aged 3-18) in Lebanon were still out of school at the end of the 2016/17 school year. Following a back-to-school campaign by MEHE, UNICEF, and local and international NGOs, enrolment increased by 14% at the beginning of the 2017/18 school year, with a total of 221,622 non-Lebanese school-age children registered in public schools.

Barriers to enrolment include child labour, as refugee parents struggle to find work, and families lack of documentation. There have been efforts to improve the flow of information to refugees about the documents (including certificates) required to register children in schools and on the creation of new school places, including 'back-to-school' campaigns. But families still struggle to navigate a complex system, which is unevenly implemented at school-level. Refugee adolescents and youth face other barriers, too. They need proof of residency to get a certified equivalency statement from MEHE's Equivalence Committee to enroll in secondary or tertiary education, along with school transcripts or diplomas from Syria.<sup>30</sup> Syrian adolescents and youth who enroll in Lebanese public schools need official transcripts to receive their Brevet and Baccalaureate diplomas.<sup>31</sup>

The lack of future employment or higher education opportunities also put young people off enrolling in formal education.

30 UNHCR, UNICEF and UNESCO Q&A for the 'Back to School' campaign 2017/18, August 2017, pp. 2-3

31 Bassme and Zeitouneh (December 2017) Access to Education for Syrian Refugee Youth Lifting Limitations for Refugees to Gain Official Diplomas. In a survey conducted by Bassme and Zeitouneh, less than 50% of children aged 13 to 15 are enrolled in some forms of education, the number drops to 20% for those between the age of 16 to 18 and is only 13% for those above the age of 18

Poor transportation and the need to travel long distances to reach schools were other serious barriers to education, in particular for children attending second shifts and leaving school at a late hour – making up 71% of refugee children enrolled in formal schools.

Continuing social tensions can also affect schooling. Public protests outside one school in northern Lebanon, for example, saw refugees leave the area and the school suspend its afternoon shift, coinciding with a municipality order giving notice to refugees residing in the town to leave.

In 2017, MEHE made slow progress towards expanding certified early childhood learning opportunities through Community-based Early Childhood Education (CECE). Non-formal education (NFE) can provide crucial learning opportunities for the most marginalised children, but is only reaching 42,798 children. The NFE framework is still not fully implemented – not all its contents have been approved and standard operating procedures have not been developed for all its components. The certified content for the Youth Basic Literacy and Numeracy (YBLN) programme was approved in 2017 but is yet to be implemented for this particularly vulnerable age-group.

While the Lebanese government has focused mainly on increasing access to learning opportunities, it has attempted to improve the quality of education too. Its new strategy, 'Support to RACE II', developed with the World Bank, was launched in 2017 to achieve exactly that. It included the training of 5,000 teachers and the deployment of academic counsellors in 314 second-shift schools to monitor the quality of teaching and support teaching initiatives. It placed community volunteers in schools to report on corporal punishment and bullying. To reach the most vulnerable children, MEHE has also started a multi-year project on inclusive education for children with disabilities with the support of NGOs and UNICEF.

RACE II also aims to create around 2,000 technical and vocational training places in state-run schools by 2021.<sup>32</sup> Although there has been some progress in identifying the problems with the technical and vocational training sector, suggested reforms have not been implemented.<sup>33</sup> Like the public primary and secondary education sectors, state-run technical and vocational training suffers from low public spending,<sup>34</sup> low quality of instruction, inadequate and poorly equipped training spaces,<sup>35</sup> and lower enrollment rates than the private sector.<sup>36</sup> Moreover, vocational training is closely linked to the right to work and Syrians are only legally allowed to work in three sectors: agriculture, construction and 'environment', which includes garbage collection and cleaning jobs.<sup>37</sup>

32 Ministry of Education and Higher Education Lebanon (August 2016), 'Reaching All Children with Education: Annexe 1: Race II Logframe (2017-2021)'. The programme aims to raise the number of places for non-Lebanese students in state technical and vocational schools

33 European Training Foundation (September 2016), 'Mapping vocational education and training governance in Lebanon', EU Law and Publications, September 2016, p. 12

34 Loo, Bryce and Magaziner, Jessie (May 2017) 'Education in Lebanon.' WERN – World Education News and Reviews; BankMed – Market & Economic Research Division (June 2014) 'Analysis of Lebanon's Education Sector', p. 5; UNESCO & UNEVOC (November 2012) World TVET Database – Lebanon, p. 14.

35 UNESCO & UNEVOC (November 2012) World TVET Database – Lebanon, p. 14; European Training Foundation & The World Bank (2006) 'Reforming Technical Vocational Education and Training in the Middle East and North Africa: Experiences and Challenges', p. 36

36 European Training Foundation & The World Bank (2006) 'Reforming Technical Vocational Education and Training in the Middle East and North Africa: Experiences and Challenges', p. 10

37 Lebanon Support (2016) 'Formal Informality, Brokering Mechanisms, and Illegality. The Impact of the Lebanese State's Policies on Syrian Refugees' Daily Lives', p. 12



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My dream is to graduate not only from school but also from university. That is why my painting today is of me in a few years, wearing my graduation gown.”

Noora, 15 years old, a Syrian refugee living in Lebanon



Retention remains a challenge for schools. More monitoring is needed to measure the scale of the problem and analyse the reasons children drop out. The highest dropout rates among Syrian children are in Bekaa, where 80% are out of school. The quality of education, the curriculum, the language used by teachers, discrimination, violence and the fact children lose their residency at 15 are often cited as the main reasons for drop outs. Parents have reported to humanitarian organisations that they take their children out of school because they fear for their safety, while many children are afraid to talk about the bullying they have experienced.

## Protection

The majority of refugees who fled to Lebanon continue to struggle to get the protection they need. In the run-up to the 2017 Brussels Conference, the government of Lebanon eased the process for refugees to secure legal stay by waiving a US\$200 residency fee for some Syrian refugees registered with UNHCR (February 2017) and not covering Palestinian Refugees from Syria. However, the actual impact of this change remains limited and many barriers to obtaining residency persist. One such barrier is the continued suspension of UNHCR registration, which excludes all refugees who arrived in Lebanon after 1 January 2015 from any measures contingent on their access to UNHCR registration certificates. According to UNHCR's 2017 annual vulnerability assessment, 74% of Syrians aged 15 and above in Lebanon are without legal residency.<sup>38</sup> In the majority of General Security Offices, reports from refugees through protection monitoring indicate that the fee waiver is not implemented correctly and that particularly refugee men of working age continue to be arbitrarily excluded from obtaining legal stay on the basis of their UNHCR registration certificates. Often, they are instead told to obtain a Lebanese sponsor, which increases their exposure to exploitation and abuse, while they have only limited access to legal support to challenge exorbitant fees or withheld wages.

Despite a commitment in the Brussels Conference outcome statement to improve the regulatory framework for refugees, including for residency, the fee waiver has not been extended to include other categories of refugees currently not eligible. This leaves unregistered refugees and those who were previously sponsored without safe pathways to obtaining legal.

The number of refugees without residency is increasing by an estimated 30,000 children per year, as they turn 15 and are required to secure their own legal status. The Lebanese authorities only accept Syrian ID that can solely be obtained in Syria after a child turns 15. The result is that some 120,000-150,000 children have lost or failed to maintain their legal status simply by reaching 15. Changing government administrative procedures to accept other forms of official identification – such as Syrian Family Books, Civil Extracts or UNHCR documentation – would solve the problem.

The government of Lebanon took positive action to facilitate civil status registration in 2017, by simplifying birth and marriage registration. In September, the government's Personal Status Department (PSD) declared that the valid legal residency of parents is no longer required to register births with the Foreigners' Registry Office, while only one spouse requires legal residency or an entry card to register a marriage. However, if one or both parents do not have residency, after the birth is registered the PSD will share a copy of the birth certificate with GSO, potentially raising protection risks for the family. In February 2018, the Ministry of Interior and Municipalities put in place a clear mechanism for birth registration at the PSD for foreigners in all governorates for all births that have taken place since the beginning of 2011 on Lebanese soil.

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38 UNHCR (December 2017) Vulnerability Assessment of Syrian Refugees in Lebanon, p.13, <https://reliefweb.int/report/lebanon/vasyr-2017-vulnerability-assessment-syrian-refugees-lebanon>

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Women and children have to work instead of the husband who doesn't have valid residency.

Widad a Syrian refugee living in Bekaa, Lebanon



Refugees' lack of legal status continues to curtail their access to humanitarian assistance and services, such as education and healthcare. Refugees restrict their movement because if they are found not to be legal residents they face the risk of arrest and detention – at checkpoints and during raids on informal settlements and workplaces, for example. This also plays a role in driving child labour; reluctant to leave their homes, many parents are forced to send their children – who are permitted more freedom of movement – out to work. The lack of legal status, economic insecurity and the poor living conditions of crowded settlements can exacerbate the risk of gender-based violence, including as a reaction by men to the erosion of their traditional gender role.

Last year saw an increase in punitive measures by municipal authorities at the local level – including evictions, expulsions from municipal boundaries and curfews. Two-thirds of municipalities across Lebanon applied some form of restriction on refugees by September 2017, according to protection monitoring. In some circumstances, evictions appear to have been used as a municipal-level response to actual or perceived criminal acts by refugees. This risks legitimising collective punishment for acts taken by individuals and further stigmatising refugees as security threats. Public protests against Syrians – for example, demanding the closure of Syrian-run businesses or the immediate return of communities to Syria – have in some places been supported by municipal authorities.

Refugees have reported feeling increasing pressure to go back to Syria – due to a mounting sense of insecurity, discrimination and fears that access to assistance will decrease – before the conditions are in place for their voluntary return in safety and dignity. Refugees who were part of a movement from Aarsal to Idlib in August (brokered and facilitated by Government of Lebanon, as part of an agreement with armed groups) reported being heavily influenced by 'push factors' and had little idea of what the conditions would be like when they returned.<sup>39</sup> Refugees with disabilities or injuries who need health services remain particularly vulnerable in Lebanon and would face specific risks if coerced to return to Syria.

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39 See, for example, Human Rights Watch (September 2017) 'Lebanon: Refugees in Border at Risk' <https://www.hrw.org/news/2017/09/20/lebanon-refugees-border-zone-risk> For further information on discussions around return and resettlement from Lebanon, please contact the Lebanon Humanitarian INGO Forum (LHIF)



**Health<sup>40</sup>**

Just 32% of the Lebanon Crisis Response Plan's health sector appeal was funded in 2017. This affected the sector's capacity to provide sufficient subsidised primary and hospital care for vulnerable Lebanese and Syrian refugees.

The cost of services and transport continues to inhibit refugees' access to healthcare. Refugees can rarely afford top-up fees and non-subsidised services. There are severe gaps in Syrian refugees' access to secondary healthcare, including to dialysis and cancer treatment. Though the cost of hospital-based birth deliveries are covered by UNHCR, assessments indicated an increasing number of women are delivering at home, and maternal and neonatal mortality rates are of growing concern.

Geographical and physical accessibility are also barriers. In remote areas, there is often a lack of available primary health clinics or affordable transportation to reach them. As discussed, refugees are often not free to move because of a lack of legal stay.

Most clinics and dispensaries in Lebanon are not subsidised by external donors, and are therefore not able to offer affordable services to Syrian and vulnerable Lebanese beneficiaries. Concerns about severe funding shortages for the UN Relief and Works Agency (UNRWA) could substantially affect the availability of health services for Palestinians in 2018.

**Recommendations****Regulatory framework for refugees: residency**

- To substantially improve refugees' **protection, access to services and decent work**, the government of Lebanon should adopt a fair and transparent system that allows all refugees to obtain and maintain **legal residency** without fees or sponsorship (including refugees who have lost their legal residency after turning 15).

**Livelihoods**

- Donor funding agreements for large-scale employment-creation programmes and infrastructure projects should include the **monitoring and enforcement of labour safeguards** as minimum requirements.
- The government should adopt a **decent work agenda** as part of its efforts to expand the Lebanese economy, covering four interrelated areas: respect for fundamental workers' rights and international labour standards, employment promotion, social protection, and social dialogue.
- The Government of Lebanon should facilitate work permits in appropriate sectors where there is a demonstrated labour force gap.

**Education**

- The Ministry of Education and Higher Education (MEHE) should **expand classroom spaces** for refugee children and invest in community-based curricula, psycho-social

40 Follow-up discussion on recommendations relating to the health project under the Global Financing Facility required

support and recreational manuals by the Center for Research and Development (CERD). MEHE and donors should provide increased support for **Non-Formal Education programs** and make short accelerated learning programmes more flexible.

- MEHE should lift 'decree number 40' and provide all Syrian students that have passed the Brevet and Baccalaureate exams with official diplomas, instead of providing those without official transcripts with an 'evidence of success' document.
- MEHE should **increase access to information**, such as sharing school drop-out lists with operational partners, and improve **monitoring and reporting**: MEHE should define indicators to measure learning outcomes and improvements in the quality of education.
- MEHE should implement the Child Protection Policy, including by developing **specific measures to ban corporal punishment and bullying** at school and provide quality training to teachers.

### Protection

- The Government of Lebanon should ensure that all refugees are able to obtain civil registration documentation – including birth, marriage, divorce and death certificates – and fulfil their legal obligations in Lebanon without restrictions such as deadlines for registration. It should address barriers to freedom of movement and legal residency.
- All governments must uphold the right to voluntary return in safety and dignity in line with international law, including refraining from facilitating or promoting the return of refugees to Syria in the absence of a sustainable political solution to the conflict, dignified living conditions and safety in return locations.
- The Ministry of Interior and Municipalities (MoIM), alongside humanitarian and development actors, should urge local authorities to refrain from issuing harmful restrictions on refugees such as notices of eviction and expulsion.

### Health

- The Government of Lebanon should support close in-country coordination between all health actors to ensure programmes complement each other and **access** to healthcare services is equitable.
- The Ministry of Public Health (MoPH) and donors should address the **financial barriers affecting refugees' access to health services**. This should include supporting an increased number of primary healthcare facilities, notably through the expansion of the National Primary Healthcare network, which offers subsidised services for Syrians and host communities; increasing geographical coverage; and supporting safe and affordable transportation to hospitals.
- Donors and the MoPH should swiftly fund access to secondary health care, in particular for Syrian refugees and for conditions not covered by UNHCR, including congenital malformations, chronic renal failure, cancer and other critical conditions.

### Facilitating NGOs' role in the response

- The Ministry of Labour (MoL) should **reduce delays in processing work-permit applications** for international NGO staff (in crucial roles that require international recruitment to find people with the necessary skills) and Palestinian staff.
- The government should ensure that international NGOs' pending **registration applications** are processed to regularise their legal status within Lebanon.

## Turkey

Turkey hosts more than 60% of all Syrian refugees, and significant numbers from Iraq, Afghanistan and elsewhere. Its total refugee population is now approximately 3.8 million – larger than the population of seven EU member states – making Turkey the largest refugee-hosting country in the world.

Turkey participated in the London Conference in 2016, where it reiterated a number of commitments in a statement of intent, including:

- continuing its support for Syrian refugees under its temporary protection and their host communities
- the enrollment of 460,000 Syrian children into school by the end of 2016/17
- the appointment of Syrian teachers and health professionals in relevant institutions.

However, Turkey did not send high-level representation to the first Brussels conference that took place in 2017. Nevertheless, the interventions that are designed to respond the needs of the refugees in the country could be measured within the framework of the areas that formed the substance of the Brussels conference co-chairs declaration, including the protection of refugees, the school enrollment rates and the access of the refugees and host communities to vocational training.

## Livelihoods

According to the largest-ever opinion poll of Syrian refugees in Turkey, their number one priority is access to employment and livelihoods opportunities.<sup>41</sup> The government of Turkey announced that Syrians would be eligible to apply for work permits in January 2016, but only 15,000 permits have actually been issued. This is a fraction of both the 1.8m working-age Syrians<sup>42</sup> in Turkey, and the 600,000 Syrians thought to be working informally.<sup>43</sup> The challenges in increasing the numbers of work permits issued include:

- refugees' lack of access to information, fast-changing regulations and the difficulties in applying for a work permit – 61% of respondents in one survey said that regulatory challenges are the biggest obstacle to obtaining work permits.<sup>44</sup>
- the fact that refugees are only eligible to apply for work permits in the province in which they are registered, hampering their ability to take work in other provinces. Although changing province and registration is theoretically possible, the differences in the way each Provincial Directorate of Migration Management (PDMM) office implements the travel permission application and the sometimes long waiting periods hinder Syrian refugees' chances of getting a job.
- the difficulty some professionals, especially doctors and lawyers, have in converting their professional qualification to make it valid for the Turkish job market.

41 Oxfam and partners (forthcoming), 'Understanding Syrian Refugees in Turkey'

42 İrfan Kaygısız (August 2017), "Suriyeli Mültecilerin Türkiye İşgücü Piyasasına Etkileri", Friedrich Ebert Stiftung, <http://www.fes-tuerkei.org/media/pdf/D%C3%BCnyadan/2017/Du308nyadan%20-%20Suriyeli%20Mu308ltcilerin%20Tu308rkiye%20I307s327gu308cu308%20Piyasasına%20Etkileri%20.pdf>

43 Friedrich Ebert Stiftung, August 2017

44 Building Markets (June 2017) Another Side to the Story: A Market Assessment of Syrian SMEs in Turkey, [http://buildingmarkets.org/sites/default/files/pdm\\_reports/another\\_side\\_to\\_the\\_story\\_a\\_market\\_assessment\\_of\\_syrian\\_smes\\_in\\_turkey.pdf](http://buildingmarkets.org/sites/default/files/pdm_reports/another_side_to_the_story_a_market_assessment_of_syrian_smes_in_turkey.pdf)

- the language barrier, which makes it more difficult for refugees to access information, secure employment, and navigate the regulatory system.
- the limited proportion of foreign workers employers in Turkey are permitted to hire
- the persistent and multifaceted informality of the country's labour market – ranging from informal employees of informal or formal enterprises, to unpaid family workers, to marginal own-account workers – contributes to the reluctance of employers to obtain work permits for Syrian refugees.

As a result of these challenges, refugees, along with their low-income host community peers including youth and women, often end up in unprotected, insecure and low-income jobs. Removing the obstacles that prevent work permits being issued would increase the chances of refugees getting secure, formal employment and provide them with similar legal protection to their peers in host communities.

However, the real issue is the long-term integration of Syrian refugees into the labor market. Meeting that challenge will involve creating good-quality jobs, systematically assessing the Syrian and host community labour force, matching their skills with the labour market's needs, and giving people the training and support they need to find decent work.

A strategy to properly integrate Syrian refugees into the job market will require multi-stakeholder partnerships between the government, the private sector and donors. It will also need to take into account the average education of Syrian refugees. An estimated one-third of the Syrian refugees in Turkey have no formal education and only 8% have completed higher education.<sup>45</sup> In addition, 68% of Syrian women looking for employment in Turkey have never worked previously, many of whom will not have formal qualifications.<sup>46</sup> The strategy will need to incorporate vocational training that responds to these realities, and target sectors in which there are clearly-identified employment opportunities for this workforce.

### **Syrian SMEs**

Many Syrian refugees turn to self-employment to support themselves and their families. These businesses range from start-ups to the re-establishment of former enterprises. The total number of Syrian-owned companies in Turkey is estimated at more than 10,000 – if informal, unregistered businesses are taken into account.<sup>47</sup> The Union of Chambers and Commodity Exchanges of Turkey (TOBB) estimated that in the first quarter of 2017, Syrians would establish more than 2,000 new companies in 2017, amounting to around US\$90 million of Syrian capital.

The Syrian Economic Forum's survey, 'Another Side to the Story', indicated that Syrian business people in Turkey, by and large, are well-educated, with 60% of them holding a university degree, and tend to command had a high income.

With a much more favourable business environment than in neighbouring countries, the investments and enterprises of Syrian refugees in Turkey are increasing significantly year by year. Nevertheless, Syrian entrepreneurs face a number of challenges, similar to those faced by

45 Oxfam and partners (forthcoming), 'Understanding Syrian Refugees in Turkey'.

46 Ibid.

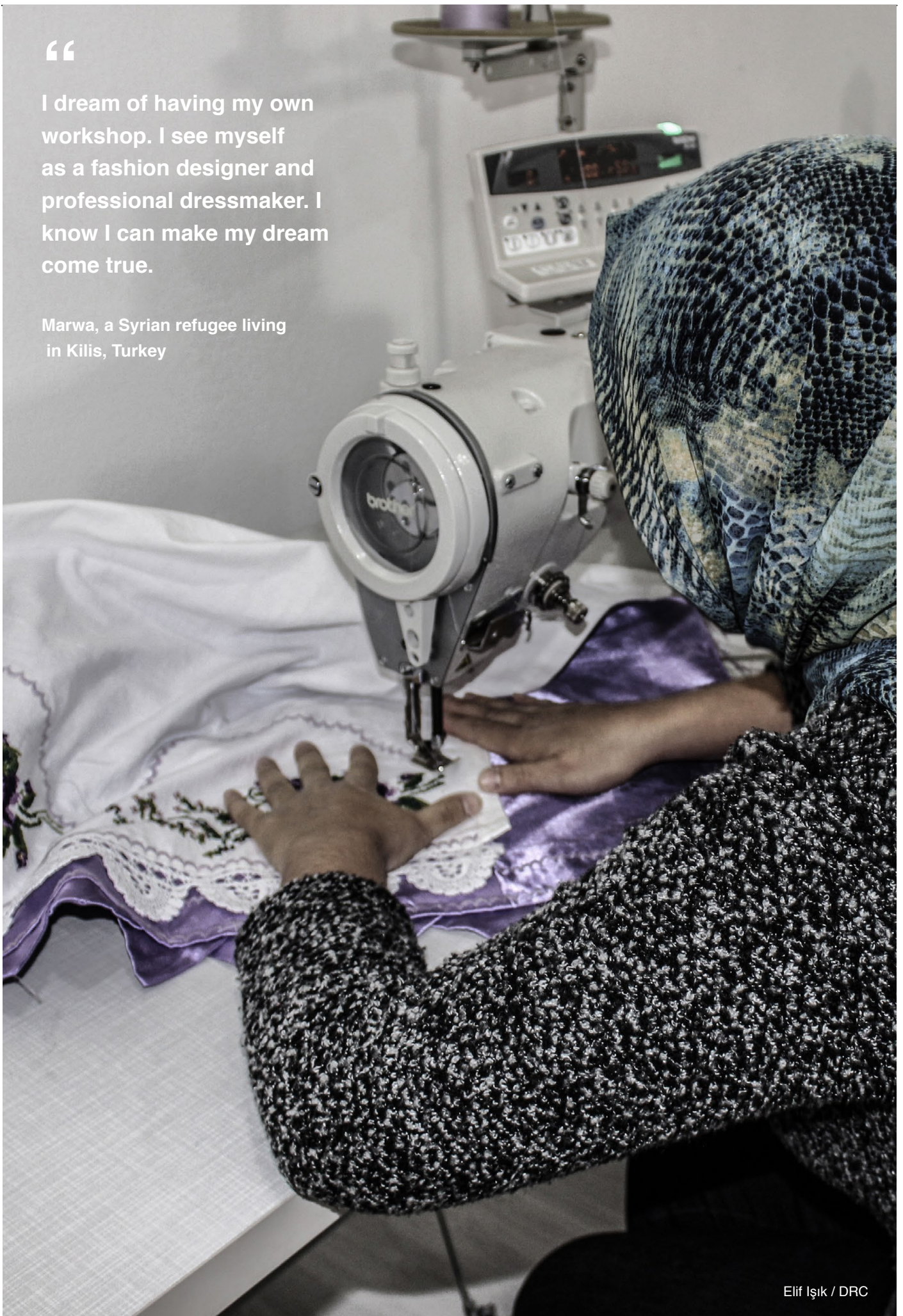
47 Building Markets (June 2017) Another Side to the Story: A Market Assessment of Syrian SMEs in Turkey, p. 9, [http://buildingmarkets.org/sites/default/files/pdm\\_reports/another\\_side\\_to\\_the\\_story\\_a\\_market\\_assessment\\_of\\_syrian\\_smes\\_in\\_turkey.pdf](http://buildingmarkets.org/sites/default/files/pdm_reports/another_side_to_the_story_a_market_assessment_of_syrian_smes_in_turkey.pdf)



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I dream of having my own workshop. I see myself as a fashion designer and professional dressmaker. I know I can make my dream come true.

Marwa, a Syrian refugee living in Kilis, Turkey





refugees seeking employment. They must navigate an unfamiliar system, deal with the language barrier and cope with restricted mobility that limits trade and business expansion.

The language barrier and lack of uniformity in the implementation of legislation are among the factors that push Syrian refugees to establish informal enterprises.

Syrian entrepreneurs also face restricted access to financial services, including savings and credit services. While the financial services penetration rate in Turkey is fairly low overall, access to financial services is particularly difficult for refugees. The system is hard for them to navigate, financial service providers lack awareness about the specific situation of Syrian refugees, and national and international financial systems see Syrians as high-risk clients. Although Syrian businesses theoretically have a right to all the concessions given to international investors, they struggle to access many of the dedicated business development support services offered by government institutions, such as the Small and Medium Enterprises Development Organization (KOSGEB) and the Credit Guarantee Fund (KGF), as well as investment opportunities provided by local authorities. Indeed, 93% of small and medium-size enterprise (SME) owners surveyed indicate that they have received no financial or technical support from government or financial institutions, or other stakeholders.<sup>48</sup>

Syrian women entrepreneurs, especially those from lower socio-economic groups, face particular challenges in setting up businesses. In general, they are less well educated than their male counterparts, have less prior work experience, and are less likely to speak Turkish.<sup>49</sup> Many also face social and cultural barriers to economic participation in general, such as their household responsibilities, which make setting up an enterprise more challenging. Finally, the problems faced by all refugees in accessing financial services are particularly acute for Syrian women.

## Education

The government of Turkey has met the commitment it made at the London conference in 2016 to enroll 460,000 Syrian refugee children by the end of the school year 2016/17 – by June 2017, 480,000 Syrian children were in school, including 190,000 in Turkish public schools. A further 30,000 young children had access to early childhood education, and 15,000 refugees youth were enrolled in higher education.<sup>50</sup> For the year 2017/18, 577,060 Syrian refugee children were enrolled by October 2017, a 25% increase on last year.<sup>51</sup>

In May 2017, the government of Turkey announced a three-year plan to transfer 300,000 Syrian refugees into the national education system and to give more out-of-school children access to the classroom.

By October 2017, for the first time since the beginning of the crisis, more Syrian refugee children were enrolled in Turkish public schools (315,047) than in temporary education centres (273,515).<sup>52</sup> This also represented a 65% increase in the enrolment in public schools of Syrian refugees – the result of raising awareness among refugee communities about the education opportunities open

48 Building Markets (June 2017) Another Side to the Story: A Market Assessment of Syrian SMEs in Turkey, [http://buildingmarkets.org/sites/default/files/pdm\\_reports/another\\_side\\_to\\_the\\_story\\_a\\_market\\_assessment\\_of\\_syrian\\_smes\\_in\\_turkey.pdf](http://buildingmarkets.org/sites/default/files/pdm_reports/another_side_to_the_story_a_market_assessment_of_syrian_smes_in_turkey.pdf)

49 Oxfam and partners (forthcoming), 'Understanding Syrian Refugees in Turkey'

50 Turkey education mid-year dashboard, June 2017

51 MoNE, November 2017, [hbogm.meb.gov.tr/meb\\_iys\\_dosyalar/2017\\_10/23112120\\_YNTERNET\\_BYLTENY\\_23-10-2017.pdf](http://hbogm.meb.gov.tr/meb_iys_dosyalar/2017_10/23112120_YNTERNET_BYLTENY_23-10-2017.pdf)

52 Ibid

to them, the construction of 60 new pre-fabricated schools, and the training of teachers to meet the needs of refugee children. Another key reason enrolment has increased is that, as of the 2016/17 academic year, students entering the first grade have been legally obliged to register in public schools, and as of the 2017/18 academic year, this has been extended to students entering the second grade.

While the government has made significant progress in improving access to education for Syrian refugees, and in particular to integrate them into the national education system, an estimated 390,000 children remain out of school in Turkey, including 256,000 Syrian refugees or 31% of the Syrian school-age population.<sup>53</sup> Refugee children in Turkey continue to face a number of barriers to learning, which limit their access to education or increase their risk of dropping out. This includes a lack of appropriate documentation. As Syrian refugees frequently move between provinces, their children are often not registered in their province of residence, making it difficult for them to enroll in education. The language barrier could increase the rate at which Syrian children drop out, and needs to be addressed through extra Turkish language classes for children. In October, with the launch of the “project to improve Syrian children’s access to education”, the MoNE aims to hire 5,600 Turkish language teachers with the support of the EU in order to reach 390,000 Syrian children who are not yet in public schools.

The traumatic experiences and associated psycho-social issues often faced by refugees who have fled Syria’s brutal conflict can also reduce school attendance. The MoNE has hired additional counselling services in schools to ensure refugee children can receive appropriate psycho-social support. In Gaziantep province alone, 61 guidance counselors were hired to cater for the needs of 38,850 Syrian children enrolled in public schools. But in 2017, there was only 1 counselor per 538 students.

A wider challenge is that, for the most part, only enrolment figures are monitored, so information on dropout rates is limited. Now that enrolment figures have increased significantly, a focus on attendance is needed to ensure that Syrian children are benefitting from the services in which they are enrolled.

The serious issues faced by Syrian refugee families, including high poverty levels and joblessness, mean they sometimes resort to child labour or child marriage, especially in female-headed households. This particularly affects adolescents’ access and attendance – enrolment rates start to significantly drop for children aged 13 or over, who have often missed out on school for several years. The MoNE launched as part of the ‘Promoting Integration of Syrian Children into the Turkish Education System’ (PICES) project, an Accelerated Learning Programme to help these children catch-up, but more needs to be done to increase educational opportunities at secondary level, and to address issues of protection and livelihoods jointly. There is also evidence to indicate that improving Syrian women refugees’ access to livelihoods opportunities will help reduce child labour.

In April 2017, the MoNE announced the gradual closing down of temporary education centres (TECs), as refugee children transition into public schools. Integrating refugee children into a strengthened education system is a positive step but it puts the future of 13,178 Syrian refugee teachers who were employed in TECs at risk. The national education system must tap into their potential and provide ways for some Syrian teachers to work in the public school system. It should give them Turkish language classes, recognise their qualifications, provide them with training and ensure better cooperation between local and Syrian teachers.

53 MoNE, November 2017, [hbogm.meb.gov.tr/meb\\_iys\\_dosyalar/2017\\_10/23112120\\_YINTERNET\\_BYLTENY\\_23-10-2017.pdf](http://hbogm.meb.gov.tr/meb_iys_dosyalar/2017_10/23112120_YINTERNET_BYLTENY_23-10-2017.pdf)

## Protection

Turkish authorities continue to update the regulations and legislative framework governing the status of Syrian refugees in the country. Registration under Temporary Protection in Turkey grants Syrians access to a wide range of essential services, including education and primary healthcare. For instance, all Syrian refugees under Temporary Protection can apply for access to the Emergency Social Safety Net (ESSN) programme, operated by the Turkish government, the Red Crescent (Kızılay), ECHO, and the World Food Programme. Reaching over 1 million people, it is thought to be the largest ever cash transfer programme funded by the EU. Eligible families can obtain monthly cash assistance of 120 Turkish lira per family member through a debit card. According to the latest data presented in September 2017 by the ESSN taskforce, 359,959 applications had been lodged as of October 2017, of which 185,825 households were judged eligible.<sup>54</sup> Key barriers to accessing this service include lack of access to up-to-date information on the programme and eligibility criteria. The integration of the programme into the national social assistance system is ongoing, and it is thought that an evaluation by the World Bank could accelerate this process.

Although not an official policy, there are efforts underway to balance the number of Syrian refugees in different provinces. It is reported that some municipalities stopped issuing new Temporary Protection cards as of November 2017, and the registration of some vulnerable groups, such as pregnant women, is no longer prioritised. This has pushed some women to use another person's TP card to access hospital services. Reportedly, five provinces currently do not accept the transfer of a Syrian refugee TP ID: Hatay, Kilis, Istanbul, Gaziantep and Sanliurfa. Refugees are, in effect, barred from legally relocating to these provinces. While there are exceptions where relocation is permitted, anecdotal evidence suggests that no attempt to relocate has so far been successful in practice.<sup>55</sup>

Discussions on providing a longer term approach to the protection of Syrian refugees in Turkey, including potentially granting them citizenship and/or long-term residency, are ongoing. Government statements indicate that 12,000 Syrians have been granted Turkish citizenship to date, with a further 50,000 applications in progress.<sup>56</sup>

UNHCR and IOM report that there have been 20,315 spontaneous returns of Syrian refugees from Turkey to Syria in the first six months of 2017,<sup>57</sup> although UNHCR has only been able to capture 9,000 of these through its continuous border monitoring.<sup>58</sup> These figures are likely to be an underestimate – other sources report between 50,000<sup>59</sup> and 70,000<sup>60</sup> Syrians returned from

54 World Food Programme and European Union (2017) 'About the ESSN Card', <http://www.essncard.com/about-card/>

55 According to field observations by humanitarian organisations in the refugee response

56 Daily Sabah (Sept 2017) 'Turkey Processing Citizenship for 50,000 Syrians', <https://www.dailysabah.com/turkey/2017/09/23/turkey-processing-citizenship-for-50000-syrians>

57 UNHCR (June 2017), 'Flash Update: Syrian Refugee and IDP returns', <https://reliefweb.int/sites/reliefweb.int/files/resources/58330.pdf>

58 UNHCR (August 2017), 'Update: Durable Solutions for Syrian Refugees', <https://reliefweb.int/sites/reliefweb.int/files/resources/UpdateonDurableSolutionsforSyrianRefugees-7August2017.pdf>

59 Daily Sabah (July 2017), 'Syrian Refugees: Thousands Born in Turkey, Thousands Leave in Sixth Year of Conflict', <https://www.dailysabah.com/turkey/2017/07/28/syrian-refugees-thousands-born-in-turkey-thousands-leave-in-sixth-year-of-conflict>; Bloomberg (April 2017) 'Turkish FM: 50,000 Return to Areas Ankara Controls in Syria', <https://www.bloomberg.com/news/articles/2017-04-01/evacuations-of-opposition-fighters-resume-in-syria-s-homs>; <http://www.hurriyetdailynews.com/around-50000-return-to-areas-cleared-of-terrorists-in-syria-turkish-says.aspx?pageID=238&nID=111526&NewsCatID=352>; and <http://www.milliyet.com.tr/100-bin-suriyeli-el-bab-yolcusu--gundem-2423602/>.

60 Hurriyet Daily News (August 2017), 'Around 100,000 Refugees Expected to Return to Syria from Turkey by End of 2017: Study', <http://www.hurriyetdailynews.com/Default.aspx?pageID=238&nID=116438&NewsCatID=341>

Turkey to Syria between August 2016 and August 2017 – equivalent to, at most, just over 2% of currently registered Syrian refugees in Turkey. These returns appear to have been spontaneous and voluntary, but this can't be verified. Turkish authorities report that they have apprehended and returned to Syria approximately 250,000 Syrians at their border.<sup>61</sup>

In line with trends observed in previous years, an estimated 172,000 Syrians temporarily returned home for Eid in 2017,<sup>62</sup> with majority coming back to Turkey after the holidays. After returning from their temporary Eid visit in Syria, refugees face challenges in re-establishing their stay in Turkey. One of the most common challenges is the absence of the digital record of their departure and that they find that their TP ID is no longer recognised and/or cancelled when returning to Turkey.

## Recommendations

### Livelihoods

- **Reduce waiting times for work permits** under both temporary protection and residency schemes, and **ease regulatory burdens** so that applications are processed without significant delays.
- Encourage the **formalisation of Syrian SMEs and promote their integration** into the Turkish economy by increasing dialogue, accessibility of information and partnership programmes.
- Harmonise the **implementation of legislation across provinces** to ease and clarify the procedures governing access to formal job opportunities, ESSN, nationality and other essential services.

### Education

- Continue **integrating refugee children into Turkish public schools**, with particular emphasis on creating spaces at secondary level.
- **Support the transition of refugee children from TECs to Turkish public schools** by increasing Turkish language classes for children and helping Syrian refugee teachers to teach in the formal system.
- **Loosen barriers to enrolment** such as documentation restrictions for children moving between provinces, and address issues of child labour and child marriage through better integration with livelihoods programmes, such as the Emergency Social Safety Net.

### Protection

- **Eliminate the limitations imposed on refugees' mobility**, caused by a gap between policy and practice, allowing them to move their registration papers between provinces.
- Implement **a scheme for go-and-see visits to Syria** which doesn't penalize those who take advantage and provides a dignified and informed pathway for those who might consider returning home.

61 Danish Refugee Council, Turkey (2017), Mixed Migration Monthly Updates for 2017, which compiles data from Turkish government sources (Directorate General for Migration Management (DGMM), Turkish Land Forces, and Coast Guard Services), UNHCR, International Organization for Migration (IOM) and local and regional media sources <https://drc.ngo/where-we-work/middle-east-and-north-africa/turkey>

62 Eid-ul Fitr was observed between 24 and 27 June 2017, while Eid-ul Adha was observed between 31 August and 4 September 2017.



## Progress towards financial commitments

Donors at the February 2016 London conference pledged an unprecedented total of US\$6bn in grants for 2016 to respond to the needs of people affected by the Syria crisis. By September 2016, donors had surpassed the pledges made for 2016 by 5%.<sup>63</sup> One year later, at the Brussels conference, donors did not provide additional funding, just confirming the pledges made in London. By the end of the third quarter of 2017, just over 88% of the pledge total for the year had been met, with contributions of US\$5.3bn<sup>64</sup> (see chart below). At the end of 2017, the UN reported that appeals for the refugee response was 53% funded.<sup>65</sup>

In London, donors pledged multi-year funding for the first time. The UN refugee appeals also include multi-year plans and funding. This is a welcome step that makes funds predictable and allows governments to plan national strategies and set national priorities more effectively. It also enhances the ability of refugees and citizens to hold governments to account.<sup>66</sup>

At the Brussels conference, for the four-year period 2017–2020, donors pledged the US\$6bn for 2017 mentioned above, as well as US\$3.7bn for the following three years. Grants worth US\$1.6 billion have been made for the upcoming three years, representing 43% of forward-looking pledges for grants met. Receiving the remainder of this longer-term funding is essential – it will support development work to increase the self-reliance and resilience of refugee and host communities.

Donors also pledged in Brussels to make loans of US\$30bn available to national governments for 2016–2020 – US\$11bn less than the amount pledged in London.<sup>67</sup> A small fraction of that amount (US\$2.3bn) was on concessional terms. Only 14% of the total loans pledged by donors has been made available, totaling US\$4.3bn.

Aid flows through loans – in particular non-concessional loans – risk exacerbating existing structural problems in Jordan and Lebanon. They increase public debt and generate additional pressures on their economies. Jordan's public debt has skyrocketed in recent years, as it deals with the impact of conflicts in Iraq and Syria. Lebanon's public debt steadily increased from US\$39bn in 2005 to US\$75bn in 2016.<sup>68</sup>

63 Development Initiatives (2016), Supporting Syria and the region: Post-London Conference Financial Tracking – Report One.

64 Development Initiatives (Oct 2017), Supporting Syria and the Region: Post-Brussels Conference Financial Tracking, Report Four

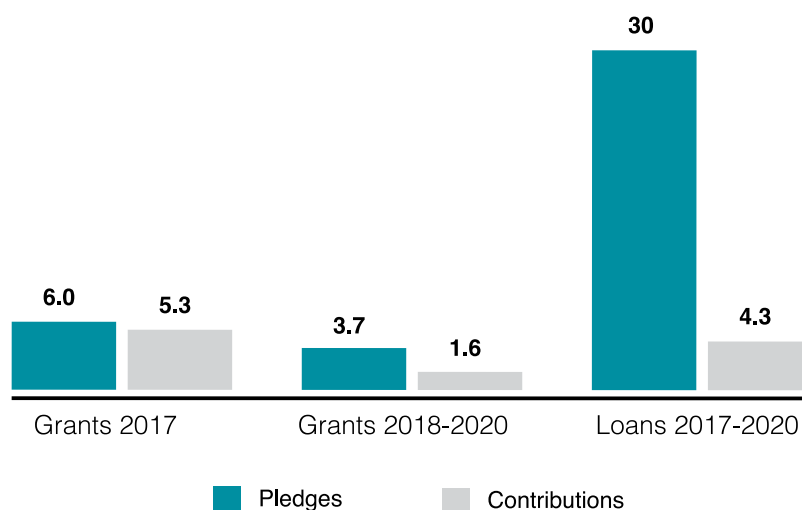
65 UNHCR, Syria Regional Refugee Response, Inter-agency Information Sharing Portal, <http://data.unhcr.org/syrianrefugees/regional.php> and UNOCHA, 'Syria Humanitarian Response Plan 2018' <https://fts.unocha.org/appeals/629/summary> (Accessed on 7 January 2018)

66 Oxfam (2017), Making Aid to Jordan And Lebanon Work: Aid Effectiveness in Middle-income Countries Affected by Mass Displacement.

67 US\$41bn loans were pledged for 2016–2020 at the London conference

68 Oxfam (2017), Making Aid to Jordan And Lebanon Work: Aid Effectiveness in Middle-income Countries Affected by Mass Displacement.

**Figure 1:** Funding contributed against funding pledged (in US\$ Billions), a) grants 2017, b) grants 2018-2020, c) loans 2017-2020



Source: 'Supporting Syria and the region: Post-Brussels conference financial tracking', Report Four, October 2017. Funding pledged by donors at the Brussels aid conference on the Syria crisis, in April 2017.

## Moving towards a durable solutions approach

Millions of refugees say they want to return home as soon as conditions in Syria improve significantly. The international community should help them realise this hope.<sup>69</sup> The reality, however, is that the country continues to be plagued by conflict and insecurity. Among the over 5 million refugees who have fled the country, a durable solution to their displacement – safe and voluntary return, local integration in their host country, or resettlement to a third country – is an option for very few of them. In light of this, there are number of steps that participants in the Brussels conference should take.

### **Safe and voluntary return**

- Participants at the Brussels conference should recognise that the return of refugees from neighbouring countries would be premature, and should view any future returns through a durable solutions framework

Ultimately, it is the responsibility of the Syrian authorities and other parties to the conflict to take steps to mitigate the risks that returnees face. These steps include respecting international humanitarian law in the conduct of hostilities; allowing returnees freedom of movement; facilitating the clearance of remnants of war; and ensuring that there are mechanisms to recognise and confirm civil documentation, status and property rights.

69 UNHCR 2017 (forthcoming), Sixty-three percent of Syrian refugees surveyed in neighbouring countries said they would like to 'one day' return to Syria. Only 6% said they actually planned to do so in the coming 12 months.





However, donors and humanitarian and development agencies can – and should – work to make returning less risky for those who decide to go back to Syria. At the same time, they must ensure that their activities in Syria do not give refugees an incentive to return to unsafe conditions. The help they provide should be needs-based and delivered in the context of a broader framework that promotes all three durable solutions: safe return, local integration and resettlement.

### ***Local integration and preserving quality of asylum***

- While recognising local integration has explicitly been ruled out for the majority of refugees from Syria, participants at the Brussels conference must follow through on previous commitments made at international conferences to address the needs of refugees and vulnerable host communities in the region, and develop and implement a mechanism to follow through on these commitments

Neighbouring countries have shown extraordinary generosity in offering asylum to and supporting refugees from Syria. But for a variety of historical and political reasons, they are either not considering a comprehensive strategy for local integration, or are ruling it out altogether. Donors and government officials are considering returns as the only future solution for refugees in Lebanon,<sup>70</sup> and Jordan's 1998 Memorandum of Understanding with UNHCR, reviewed in 2014, explicitly does not accept integration as an option for any refugees.<sup>71</sup> Turkey has adopted a different approach, offering in 2016 to integrate 300,000 refugees with full citizenship.<sup>72</sup> More recently, Turkey's Deputy Prime Minister has expressed publicly the intention to grant long-term residency to Syrians already on Turkish territory. However, much remains to be done before refugees in all three countries can be considered to be fully included in the public and economic life of their host countries.

Despite this backdrop, neighbouring countries and the international community took the significant step of adopting a 'comprehensive approach' to the crisis at the 'Supporting Syria and the Region' conference hosted in London in 2016, and consolidated a year later in Brussels. Following through on these pledges as they relate to working rights, education and legal protection is key to improving the quality of asylum for refugees.

### ***Resettlement***

- Participants at the Brussels conference should commit to resettle 10% of the refugee population in neighbouring countries, with governments making specific pledges at the conference

At the first Brussels conference in April 2017, donors recognised "*the critical role of resettlement ... to offer, together with other legal pathways, safe and dignified access to safety beyond the immediate region*". Yet, this year has seen a dramatic drop in the number of refugees from Syria who have been offered this option, with submissions by UNHCR down over 50% on 2016, as

70 Brussels annex and EU-Lebanon association council statement.

71 D. Carrion (2015) Syrian Refugees in Jordan: Confronting Difficult Truths, Chatham House Research Paper, September 2015, <https://www.chathamhouse.org/sites/files/chathamhouse/publications/research/20150921SyrianRefugeesCarrion.pdf> For a copy of the 1998 Memorandum of Understanding, see [http://carim-south.eu/databases/legal/Jordan/Bilateral%20Agreements/LE2JOR002\\_AREN.pdf](http://carim-south.eu/databases/legal/Jordan/Bilateral%20Agreements/LE2JOR002_AREN.pdf)

72 Andalou Agency (2017) Turkey Processing Citizenship for 50,000 Syrians, 22 September 2017, <http://aa.com.tr/en/todays-headlines/turkey-processing-citizenship-for-50-000-syrians/916789> According to news reports, approximately 50,000 refugees have been processed and granted citizenship. Andalou Agency (2017) Turkey processing citizenship for 50,000 Syrians, 22 September 2017



a growing political backlash has swept western countries and the political focus in Syria has switched to returning refugees. Nearly seven years since the beginning of the refugee crisis, less than 3% of the Syrian refugee population have arrived through resettlement programmes in wealthy countries that are signatories of the 1951 Refugee Convention, a percentage which has not changed in the last 12 months.<sup>73</sup>

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73 Norwegian Refugee Council and Save the Children et al (2017) Dangerous Ground: Syria's Refugees Face an Uncertain Future, <https://www.nrc.no/globalassets/pdf/reports/dangerous-ground---syrias-refugees-face-an-uncertain-future/dangerous-ground---syrian-refugees-face-an-uncertain-future.pdf>

