



# Putting Syrian Refugees Centre Stage

RPW research paper into the “Accountability  
of Affected Populations” of UNHCR Lebanon

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The **Refugee Protection Watch** aims to represent the views of the participants in this research to the best of our ability. However, we acknowledge that often some information is difficult to accurately interpret from colloquial Arabic into English. Regardless, all participant insights are treated ethically and are given with their explicit consent.

# EXECUTIVE SUMMARY

***“How communities experience and perceive our work is the most relevant measure of our performance.”***  
Statement by Principals of the Inter-Agency Standing Committee (IASC) on Accountability to Affected People in Humanitarian Action, 14 April 2022

Since the 1990s, humanitarian organisations have increasingly committed themselves to the idea of “downward accountability” to the affected populations they serve, including displaced persons. In recent years this notion has further evolved into the concept of “Accountability to Affected Populations” (AAP). As re-iterated by the Principals of the Inter-Agency Standing Committee (IASC) of the United Nations, AAP is central to principled and effective humanitarian action. *“An accountable humanitarian system, where decision-making power is in the hands of those affected by crisis, is central to humanitarian action. (...) How communities experience and perceive our work is the most relevant measure of our performance. Hence, our accountability to them is paramount and must be acted upon. It is non-negotiable, at all times. We must be instructed by affected people to guide our actions and to measure how well we provide protection and assistance against their diverse needs, feedback and perceptions, throughout the humanitarian response”,* the IASC Principals stated in April 2022.<sup>1</sup>

Such principled and effective humanitarian action, which is guided by the needs and perspectives of displaced persons, is particularly vital for the work of the UN Refugee Agency (UNHCR). Indeed, according to UNHCR the notion of Accountability to Affected Populations is an integral part of its work: *“Human rights principles guide all our work. Participation in decision-making is a right, and the rights-based approach is founded on the principle of participation and working with communities to promote change and respect for rights. These cannot be achieved without accountability mechanisms.”*<sup>2</sup> UNHCR’s AAP core actions and commitments are outlined in the UN Refugee Agency’s “Age, Gender and Diversity Policy” (2018). UNHCR’s AAP Framework includes four main core actions<sup>3</sup>:

- **Participation and inclusion:** According to UNHCR, this means concretely that *“women, men, girls, and boys of diverse backgrounds are able to engage meaningfully and are consulted on protection, assistance, and solutions.”* In an AAP manual, UNHCR has further emphasised the importance of two-way communication, in which communities can *“meaningfully participate in key decisions throughout the programme cycle: assessment and analysis, planning and design, resource mobilisation, implementation, monitoring and evaluation.”* If not done properly, UNHCR has acknowledged that there is a high risk that there will be *“ineffective programming that does not build on the knowledge, capacities and needs of persons of concern”,* because these persons are *“best placed to identify the main risks, concerns and the most effective, sustainable solutions to the problems they face.”* Lack of meaningful participation and inclusion further risks to result in community indifference, a reduced sustainability of programming, and reduced credibility and goodwill towards humanitarian actors.
- **Communication and transparency:** For UNHCR, this means concretely that *“women, men, girls, and boys of diverse backgrounds in all operations have access to timely, accurate, and relevant information on (i) their rights and entitlements, and (ii) UNHCR and its partners’ programmes.”*

<sup>1</sup> See <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>

<sup>2</sup> See <https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFPECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 5.

<sup>3</sup> See <https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFPECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>

- **Feedback and response:** According to UNHCR, this means that “*formal and informal feedback from persons of concern is systematically received and responded to and corrective action taken as appropriate.*” If not done properly, UNHCR has acknowledged that there is a high risk of “*inefficient and ineffective protection, assistance and solutions programmes that do not meet the needs of the targeted population*”.
- **Organisational learning and adoption:** As per UNHCR’s AAP framework, this means that “*interventions, planning, priority setting, course corrections, and evaluation are informed on an ongoing basis by the views of persons of concern.*” If not done properly, UNHCR has acknowledged that “*the effectiveness, impact, and quality of programming is compromised when the expressed priorities, needs, capacities and views of persons of concern are not systematically included.*”

However, despite the increased rhetorical emphasis on AAP in the past three decades, both within UNHCR and the broader international aid system, limited progress has been achieved to put this ambition into practice. This was also acknowledged by the then United Nations Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, Mark Lowcock, during a speech delivered at an event hosted by the Center for Global Development. “*Over the past decade there has been growing recognition that affected people should have more say over the type of help they get and how they get it. This has theoretically been part of every reform agenda in the system for the past 20 years. The impact of attempts to address this so far has been limited, unfortunately (...) I have reached the view that one of the biggest failings of the humanitarian system is that agencies do not pay enough attention to what people caught up in crises say they want, and then trying to give that to them. It’s because despite all our good intentions, the humanitarian system actually is set up to give people in need what international agencies and donors think is best, and what the agencies have to offer, rather than giving people what they themselves say they most need.*”<sup>4</sup>

Based on an online survey among 334 Syrian refugees, as well as 12 Focus Group Discussions (FGDs) with another 115 Syrian refugees in different locations across Lebanon and six Key Informant (KI) interviews, Refugee Protection Watch (RPW) has found that this gap between rhetoric and reality also exists for Syrian refugees in Lebanon. Key findings are as follows:

- When asked whether UNHCR Lebanon listens to their voices when developing policy and programs, and whether they felt consulted by UNHCR, **36%** of respondents to the online panel did not feel listened to. **35%** of respondents felt “somewhat” included, and **22%** did feel sufficiently listened to.

Important to note is that, when asked why online respondents do not feel that their voice is being heard by UNHCR, only a few respondents reported their lack of trust in UNHCR as the main reason. The same sentiment was repeatedly voiced during the Focus Group Discussions conducted in January and February 2023, especially among women participants (n= 60 women participants).

- When being asked whether respondents have ever been asked to give feedback to UNHCR Lebanon in the past (e.g. after they participated in a UNHCR-led project on education, vocational training, protection, psychosocial support, or other humanitarian themes), **87%** of online respondents indicated they were never invited to do so. Relatedly, **62%** of respondents to the online panel reported that they do not think UNHCR’s complaints mechanisms, such as physical complaint boxes, are sufficiently accessible, effective and safe to use.

In a similar vein, all 40 female FGD respondents in Shatila and Nabaa mentioned that they were either unaware about how to file a complaint to UNHCR, or that they considered the existing procedures to be very complicated and not straightforward. Moreover, FGD respondents in Tripoli highlighted being uncomfortable with filing a complaint at all, and expressed their fear that filing a complaint against UNHCR might result in negative repercussions.

<sup>4</sup> See <https://reliefweb.int/report/world/what-s-wrong-humanitarian-aid-system-and-how-fix-it-remarks-under-secretary-general>

- For future consultations on their priorities, preferences, and feedback, over two-third of online respondents (**65%**) indicated their preference to receive phone calls, followed by communicating face-to-face with UNHCR volunteers (**43%**). Social media (e.g. Facebook Messenger, WhatsApp, Facebook Live Session) were also indicated by **one-fifth** of the online Upinion panel.
- **68%** of online respondents who received a message informing them that their cash assistance was being reduced or cancelled, indicated they did not receive an understandable explanation from UNHCR about why this decision was taken. Similarly, **none** of the 115 Focus Group Discussion participants in Nabaa, Shatila and Tripoli said they understand the criteria based on which the UNHCR suspends individuals from financial or food aid.
- In terms of respectful communication, **half** of all respondents to Upinion's online panel indicated that UNHCR Lebanon's materials (brochures, website, etc.) are sufficiently respectful towards different cultures and values and accessible to all members of their community. This is followed by **30%** who indicated they were not sufficiently respectful, and **20%** who did not know.
- To gauge the satisfaction of respondents with specific UNHCR services, participants to Upinion's online panel were also asked to rate their satisfaction with different services provided by UNHCR Lebanon:
  - **43%** of online respondents rated their satisfaction with the UNHCR National Call Centre/hotline as 'Very bad' or 'Bad'. **35%** of the panel rated their satisfaction as 'Decent', while **20%** considered the performance of the Call Centre to be "good" or "very good".
  - **41%** of all respondents never visited UNHCR's website. Amongst people who had visited the website, the largest share of respondents rated it as 'Neutral' (**37%**), followed by 'Useful - very useful' (**30%**) and 'Not useful at all - not very useful' (**25%**).
  - When being asked to rate their satisfaction with the performance and accessibility of UNHCR Lebanon's 'Refugee Outreach Volunteers', **23%** of respondents indicated to not know as they did not know a Refugee Outreach Volunteer. Amongst those who were familiar with the Refugee Outreach Volunteers, a plurality rated their satisfaction as 'Neutral' (**35%**). Only **4%** rated their satisfaction as 'Very good'. Similarly, **none** of the 115 FGD respondents had been visited by or had engaged with UNHCR volunteers within the last 6 to 8 months.
  - When being asked whether respondents face any specific challenges/barriers to physically access UNHCR field offices, community centres or other UNHCR facilities, **37%** answered to have never experienced any specific challenges, whereas **40%** indicated to have encountered issues. The main reasons for limited accessibility were indicated to be the lack of assistance or the refusal to enter the building (**59%**), the lack of transportation/high transportation costs (**57%**), and long queues (**46%**).
  - When asked whether they had received legal advice from UNHCR or discussed their legal status with them, approximately **one-third** of all respondents indicated to have never received legal advice or counselling. The answers of those who did were quite balanced: over **40%** rated UNHCR's legal aid as 'Very bad' or 'bad', followed by **28%** that indicated 'Neutral' and **23%** that indicated 'Very well' or 'Good'.

In order to ensure more participatory, transparent, responsive and learning AAP, Refugee Protection Watch offers the following recommendations to donor governments, UNHCR Lebanon, the UN Humanitarian Country Team (HCT) and the UN Resident Coordinator/Humanitarian Coordinator (RC/HC), and UN OCHA Lebanon (the full set of recommendations can be found in section 5):

## TO DONOR GOVERNMENTS

- Provide additional funding for UNHCR Lebanon's AAP efforts, and for collective AAP in Lebanon as a whole.
- Include AAP-specific indicators and benchmarks in project requirements. Require grantees to listen to affected people and to report on how they respond to what they learn.

## TO UNHCR LEBANON

- **Develop an AAP Strategic Framework and AAP Guide:**
  - Develop a new AAP Strategic Framework for UNHCR Lebanon, and engage Refugee-Led Organisations (RLOs), refugee practitioners and refugee communities as equal thought partners in the design and implementation process of such a framework.
  - In order to implement such a new Strategic Framework, develop an AAP Guide for integrating AAP activities into programming.
- **Increase the proportion of the budget allocated to AAP activities in UNHCR Lebanon's annual budget and planning**
- **Bridge the gap between UNHCR offices and refugees, including by (see full list of suggestions in section 5):**
  - Expanding the number of UNHCR sub and field offices, and/or exploring the possibility of using mobile field offices.
  - Formally requiring staff to spend a minimal amount of their working hours outside the office, to consult and discuss directly with refugees themselves.
  - Critically evaluating the performance of the UNHCR phone hotline, and allocating more resources for its improvement.
  - Establishing a system to listen, collect, analyse, respond to and act on feedback and complaints, and communicating back to refugees about how their feedback was used.
  - Expanding the use of mobile "self-service kiosks", mobile applications or other digital communication channels to enable individuals to update their address, telephone or other regularly changing registration information, without having to approach a UNHCR office.
  - Providing cash support for transportation to UNHCR offices.
  - Organising more town hall meetings in areas with a high density of Syrian refugees, as well as video conferences where refugees can directly interact with UNHCR staff.
  - Increasing the number of UNHCR Refugee Outreach Volunteers (ROV) and providing them with training on AAP-sensitivity skills.
  - Exploring scenarios in which refugees can use WhatsApp and other social media channels to request information, provide feedback or file a complaint.
- **Prioritise AAP in internal staffing procedures:**
  - Appoint dedicated AAP officers/focal points at both HQ and sub/field office level.
  - Provide specific AAP training courses to all UNHCR Lebanon staff.
  - Ensure that terms of reference and job descriptions for all staff working on projects explicitly include implementing two-way communication activities between participants and staff and bringing refugees' comments to programme planners in the organisation.
  - Include AAP-specific targets and indicators in annual work plans and evaluation procedures for UNHCR staff members and senior management.

- **Improve planning, monitoring and evaluation practices:**
  - Conduct a bi-annual external and independent evaluation of UNHCR Lebanon's AAP policies and practices, based on a large-scale perception survey among Syrian refugees in Lebanon.
  - Expand, in future Vulnerability Assessments of Syrian Refugees in Lebanon (VASYRs), the number of AAP-specific questions; and publicly report on action points through which UNHCR intends to turn the feedback received from refugees into tangible action.

## **TO THE UN HUMANITARIAN COUNTRY TEAM (HCT) AND RESIDENT COORDINATOR/HUMANITARIAN COORDINATOR (RC/HC)**

- **Intensify efforts to mainstream AAP throughout the UN system in Lebanon:**
  - Establish an AAP Working Group within the UN's sector system in Lebanon, and ensure that such Working Group is coordinated by a full-time staff member. Ensure that a diverse set of Refugee-Led Organisations (RLOs) are systematically included in the proceedings and decision-making processes of this Working Group, and regularly invite representatives from refugee communities for a two-way discussion.
  - Make AAP needs, activities and findings a standing item on HCT and sector meeting agendas, and have AAP as an early agenda item in such meetings.
  - Actively encourage a more diverse number of representatives of local CSOs and RLOs to attend sector meetings and participate in decision making.
  - Find ways for community voices to be more included in sector meetings (inviting community representatives to present, film/audio messages, written messages, regular simple surveys etc).

## **TO UN OCHA LEBANON**

- Stipulate that partners who implement activities funded by the Lebanon Humanitarian Fund (LHF) are required to describe how affected populations and specific beneficiaries have been and will be involved throughout the project cycle. Ensure that LHF reporting and monitoring procedures verify how this has been applied.
- Increase representation of local CSOs and RLOs on the LHF Advisory Board.



# 1. INTRODUCTION

The phrase “Accountability to Affected Populations” (AAP) is widely used by humanitarian organisations to reflect their commitment to the systemic inclusion of the expressed needs and priorities of the people they work with. Through its AAP framework - outlined in UNHCR’s Policy on Age, Gender and Diversity (AGD, 2018)<sup>5</sup> - UNHCR is committed to including people’s voices, responding to their demands, and being accountable to the people it aims to serve.

However, there is a shortage of publicly available data on whether communities have noticed the results of AAP efforts, and to what extent they feel humanitarian aid is inclusive. With UNHCR playing a key role in refugee protection and aid provision in Lebanon, it is important to explore people’s perceptions and lived experiences with UNHCR.

In October 2022, Refugee Protection Watch (RPW) therefore surveyed **334 Syrian refugees in Lebanon on their perceptions on their participation, inclusion, access, and quality of UNHCR services in Lebanon**. Upinion’s online methodology was used to reach a large panel of Syrian refugees in Lebanon that are familiar with the services and activities of UNHCR Lebanon. In addition to this, 12 Focus Group Discussions (FGDs) were organised in different locations across Lebanon, which were further complemented by 6 Key Informant (KI) interviews to further explore people’s perceptions on this topic.

This report contains results on the perceived factors that play a role in UNHCR Lebanon’s accountability towards Syrian refugees. Suggestions of Syrian refugees on how UNHCR can more strongly align with its mandate of including their voices in decisions, projects, and services are furthermore presented.

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<sup>5</sup> UNHCR’s Policy on Age, Gender and Diversity, specifically core action 2-5 are reflecting AAP values:  
[https://www.unhcr.org/5aa13c0c7.pdf#\\_ga=2.128093452.1289633190.1668417629-202868819.1666090835](https://www.unhcr.org/5aa13c0c7.pdf#_ga=2.128093452.1289633190.1668417629-202868819.1666090835)

## 2. METHODOLOGY

This chapter discusses the research framework employed by Refugee Protection Watch, specifying the details per type of data collection.

### 2.1. Online data collection

#### 2.1.1. Continuous dialogue with local and refugee communities in Lebanon

Upinion has developed an online tool that allows it to securely stay in touch with people in crisis- and displacement-affected countries. This in-house developed platform makes it possible to have real-time conversations<sup>6</sup> with communities in the same way they connect with their friends and families, using messaging apps like Facebook Messenger and WhatsApp, which are also widely used in Lebanon.

By making use of this methodology, Upinion has been able to engage through regular online conversations. Since these conversations also allow Upinion to send tailored information to respondents about relevant services or initiatives in their area, the conversation is also used as a two-way information exchange.

#### 2.1.2. Recruitment

Upinion has created a digital panel consisting of Syrian refugees and members of Lebanese host communities. These individuals have been recruited through Facebook, using paid advertisements illustrating the aim of the conversation. In this way, any individual residing in Lebanon with an internet connection and a Facebook account is able to participate in an online conversation.

Individuals entered the conversation by clicking on the advertisement, after which they were directed to Facebook Messenger. They were asked for their consent to participate and whether they agreed to move into the private Upinion chat mode. In this secure environment<sup>7</sup> answers are immediately deleted from respondents' phones and no party other than Upinion can collect the answers provided.

Important to note is that, before the conversation on UNHCR Lebanon's accountability presented in this report, 15 conversations have been previously held with this panel of respondents. One of those conversations was used to collect demographic information, including nationality, gender, and age, allowing to disaggregate the findings of later conversations.

#### 2.1.3. Conversation on UNHCR Lebanon's AAP

Together with RPW partners, a conversation was developed for the Syrian respondents of Upinion's online panel in Lebanon. The questions were drafted in English and then translated to Arabic. As a time frame for data collection, the conversation was open to respondents between 13 and 24 October 2022.

334 respondents started the online conversation, of whom 282 completed the entire conversation. Data of respondents that answered a significant number of questions have been used in this report, which explains the varying n-values. All respondents have Syrian nationality. There were more male respondents (69%) that joined the conversation, compared to female respondents (31%). 77% of the respondents were between 26-45 years old, followed by 12% of the respondents aged 46-55 and 8% aged 18-25. Only a few respondents were older than 55.

Amongst the 334 Syrian respondents, 96% are currently registered with UNHCR. This is despite 29% of them encountering problems in renewing their UNHCR registration, caused by the inability to afford

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<sup>6</sup> A conversation refers to an information exchange, in survey style, between Upinion and a panel of respondents.

<sup>7</sup> Upinion has the ISO/IEC 27001 Certification, which is the international best practice standard for Information Security Management Systems (ISMSs), and follows GDPR regulations.

transportation to reach UNHCR facilities (29%, n=85) or other reasons (38%, n=85). Those who indicated to not have a registration (4%, n=15) stated that the main reasons for this were not being aware of the option to register with UNHCR, they didn't think registration would be helpful, as well as other - not specified - reasons. People without a registration were additionally asked whether they did participate in any UNHCR-led program. The few that answered "no" (n=6) could not participate in the rest of the conversation. Hence, all respondents in this survey have engaged with UNHCR at some point after 2011.

In November 2022, Refugee Protection Watch shared preliminary findings of the online data collection with UNHCR Lebanon, while draft recommendations were also shared in February 2023. Written feedback from UNHCR Lebanon's interagency staff on the draft set of recommendations was received and incorporated in March 2023.

## 2.2. Focus Group Discussions

In order to complement the quantitative data collected through the Upinion conversation (as mentioned above), 12 Focus Group Discussions (FGDs) were conducted in January-February 2023 in three areas in Lebanon: Shatila refugee camp (Beirut governorate), Nabaa/Bourj Hammoud (Mount Lebanon governorate), and Tripoli (North Lebanon governorate). Participant ages (both among men and women) ranged between 20 and 60 years old, and all respondents were beneficiaries of UNHCR. Although the socioeconomic status of the participants was not explicitly asked for, most recipients reported that their main source of income was UNHCR cash assistance and food assistance.

The FGDs mainly revolved around the following themes: describing and rating the services that beneficiaries receive from UNHCR, UNHCR's accessibility towards beneficiaries (mainly in terms of communication and reception at community centres), as well as soliciting concrete options from participants regarding improvement of UNHCR service delivery, and how best to consult with beneficiaries in an effective and humane way that prioritises refugees' needs and opinions.

**The overall goal of the FGDs was to solicit real-life testimonies from direct beneficiaries of UNHCR – knowledge that has rarely been explored in the Lebanese context.**

In total, 115 UNHCR beneficiaries (55 males, 60 females) participated in all 12 FGDs, with a disaggregation of 10 per FGD (with the exception of 2 FGDs in Shatila refugee camp: one FGD included only 6 respondents, whereas a second FGD included only 9 participants). Four FGDs were conducted in each location – two of them recounting only women participants and the other two solely recounting men. All participants (women & men) were between the age of 20 and 60 years, with a median age of approximately 38 years. In Tripoli the number of participants in the FGDs was 40 (20 females, 20 men), in Nabaa/Bourj Hammoud the number of participants in the FGDs was 35 (20 females, 15 men), and in Shatila the number of participants in the FGDs was 40 (20 females, 20 men).

## 2.3. Key Informant (KI) interviews

In order to complement and verify findings gathered during the online data collection and the FGDs, six interviews were also conducted with Key Informants (KIs). Three KIs were working for an International NGO (INGO), while the other 3 KIs were working or volunteering for a Syrian Refugee-Led Organisation (RLO).

## 2.4. Research Limitations

This methodological framework comes with a set of limitations, which need to be considered when interpreting the report's findings:

- Firstly, there is a sampling bias. Elderly people are underrepresented in the sample due to the lower likelihood of engagement or limited access to online social media platforms. Moreover, no additional efforts were made to include people with disabilities. Communities with low knowledge or trust in international or humanitarian organisations are also not likely to have engaged.
- Secondly, (ungrounded) fear of losing privileges/ support may have prevented some respondents from speaking their minds and providing their opinion on the aid actor that they strongly depend on.

## 3. UNHCR FRAMEWORK FOR “ACCOUNTABILITY TO AFFECTED POPULATIONS” (AAP)

### 3.1. General UNHCR framework and commitments

Since the 1990s, humanitarian organisations have increasingly committed themselves to the idea of “downward accountability” to the affected populations that they serve, including displaced persons. In recent years this notion has further evolved into the concept of “Accountability to Affected Populations” (AAP). This can be seen, among others, in the development of the 2015 “Core Humanitarian Standard on Quality and Accountability”, the 2016 Grand Bargain Initiative’s “Participatory Revolution”, the adoption of the “2017 Commitments on Accountability to Affected People and Protection from Sexual Exploitation and Abuse” by the Principals of the Inter-Agency Standing Committee (IASC), and the creation of a “ASC Results Group 2 on Accountability and Inclusion” in 2019.<sup>8</sup>

In an April 2022 statement, the Principals of the Inter-Agency Standing Committee (IASC) of the United Nations also reaffirmed their commitment that AAP is central to principled humanitarian action, while pledging to prioritise the implementation of this commitment in all humanitarian operations. In the words of the IASC Principals, *“an accountable humanitarian system, where decision-making power is in the hands of those affected by crisis, is central to humanitarian action. (...) How communities experience and perceive our work is the most relevant measure of our performance. Hence, our accountability to them is paramount and must be acted upon. It is non-negotiable, at all times. We must be instructed by affected people to guide our actions and to measure how well we provide protection and assistance against their diverse needs, feedback and perceptions, throughout the humanitarian response.”*<sup>9</sup>

More specifically for UNHCR, AAP is defined as a *“commitment to the intentional and systematic inclusion of the expressed needs, concerns, capacities and views of persons of concern, in their diversity; and being answerable for our organisational decisions and staff actions, throughout the operations management cycle.”*<sup>10</sup> According to UNHCR, AAP is an integral part of its work: *“Human rights principles guide all our work. Participation in decision-making is a right, and the rights-based approach is founded on the principle of participation and working with communities to promote change and respect for rights. These cannot be achieved without accountability mechanisms.”*<sup>11</sup> UNHCR’s AAP core actions and commitments are outlined in the UN Refugee Agency’s “Age, Gender and Diversity Policy” (2018). UNHCR’s AAP Framework is featured in core actions 2-5 of this Policy: participation and inclusion (core action 2); communication and transparency (core action 3); feedback and response (core action 4); and organisational learning and adoption (core action 5):<sup>12</sup>

- **Participation and inclusion:** According to UNHCR, this means concretely that *“women, men, girls, and boys of diverse backgrounds are able to engage meaningfully and are consulted on protection, assistance, and solutions.”*<sup>13</sup> In an AAP manual, UNHCR has further emphasised the importance of two-way communication, in which communities can *“meaningfully participate in key decisions throughout the programme cycle: assessment and analysis, planning and design, resource*

<sup>8</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 6.

<sup>9</sup> See <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>. See also recent remarks by the UN Emergency Relief Coordinator Martin Griffiths, who in June 2022 stated that *“we commit to enabling affected people, including women and girls, to effectively shape the humanitarian response”*. See <https://odihpn.org/publication/doing-the-right-thing-protection-from-exploitation-and-abuse-in-humanitarian-action/>

<sup>10</sup> See [https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP\\_posters-A3\\_final.pdf](https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP_posters-A3_final.pdf), p 1.

<sup>11</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 5.

<sup>12</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 7.

<sup>13</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFECTED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 7.

*mobilisation, implementation, monitoring and evaluation.*” If not done properly, UNHCR has acknowledged that there is a high risk that there will be “*ineffective programming that does not build on the knowledge, capacities and needs of persons of concern*”, although these persons are “*best placed to identify the main risks, concerns and the most effective, sustainable solutions to the problems they face.*” Lack of meaningful participation and inclusion further risks to result in community indifference, a reduced sustainability of programming, and reduced credibility and goodwill towards humanitarian actors.<sup>14</sup>

- **Communication and transparency:** For UNHCR, this means concretely that “*women, men, girls, and boys of diverse backgrounds in all operations have access to timely, accurate, and relevant information on (i) their rights and entitlements, and (ii) UNHCR and its partners’ programmes.*”<sup>15</sup> In the fourth edition of the UNHCR Emergency Handbook, the UN Refugee Agency also emphasises the key importance that such communication is “*two-way*”: “*Communities want the opportunity to question and respond to the information they receive. For example, a common mistake is to broadcast ‘bulk’ SMS without planning to receive messages from the community in return; as a result, a large number of enquiries, and potentially protection concerns, can go unanswered. It is important to establish a forum or platform for discussion to generate new ideas and enable people to challenge and contextualize the information being shared. These can be high-tech, low-tech or no-tech. Examples include refugee-led Facebook groups, call-in radio shows, or ‘town hall’ meetings.*”<sup>16</sup>
- **Feedback and response:** According to UNHCR, this means concretely that “*formal and informal feedback from persons of concern is systematically received and responded to and corrective action taken as appropriate.*”<sup>17</sup> If not done properly, UNHCR has acknowledged that there is a high risk of “*inefficient and ineffective protection, assistance and solutions programmes that do not meet the needs of the targeted population*”.<sup>18</sup>
- **Organisational learning and adoption:** As per the UNHCR AAP framework, this means concretely that “*interventions, planning, priority setting, course corrections, and evaluation are informed on an ongoing basis by the views of persons of concern.*” In an AAP manual, UNHCR has further emphasised that “*systems need to be in place to demonstrate how such feedback on programme quality is managed, responded to, and acted upon by decision makers to improve programming.*”<sup>19</sup> If not done properly, UNHCR has acknowledged that “*the effectiveness, impact, and quality of programming is compromised when the expressed priorities, needs, capacities and views of persons of concern are not systematically included.*”<sup>20</sup>

**However, despite the increased rhetorical emphasis on AAP in the past three decades, both within UNHCR and the broader international aid system, in reality limited concrete progress has been achieved.** As stated by Ground Truth Solutions, an organisation whose mission it is to bridge the gap between international aid actors and crisis-affected people, one would be “*hard pressed to find a humanitarian policy or planning document that doesn’t tout ‘people at the centre’ nowadays. But ask crisis-affected people how that is going, and they tell of continued marginalisation and a sector that can’t seem to*

<sup>14</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFEC TED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 5, p 15.

<sup>15</sup> See [https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP\\_posters-A3\\_final.pdf](https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP_posters-A3_final.pdf), p 1

<sup>16</sup> See [https://emergency.unhcr.org/entry/42554?lang=en\\_US](https://emergency.unhcr.org/entry/42554?lang=en_US), p 5.

<sup>17</sup> See [https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP\\_posters-A3\\_final.pdf](https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP_posters-A3_final.pdf), p 1

<sup>18</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFEC TED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 25.

<sup>19</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFEC TED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 5, p 7. For an overview of the different outputs and performance benchmarks, see [https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP\\_posters-A3\\_final.pdf](https://www.unhcr.org/handbooks/aap/documents/UNHCR-AAP_posters-A3_final.pdf), p 2.

<sup>20</sup> See

<https://cms.emergency.unhcr.org/documents/11982/42450/OPERATIONAL+GUIDANCE+ON+ACCOUNTABILITY+TO+AFFEC TED+PEOPLE+%28AAP%29+%282020%29/a0be43c7-e3f6-41b3-9430-cc22f9e5ec2c>, p 38.

meet even the most basic standards (...) All the right words are written in all the right places and the sector is full of individuals who care, but the system itself is geared against accountability.”<sup>21</sup>

The gap between rhetoric and action was also noticed in 2021 by the then United Nations Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, Mark Lowcock, during a speech delivered at an event hosted by the Center for Global Development:

“Over the past decade there has been growing recognition that affected people should have more say over the type of help they get and how they get it. This has theoretically been part of every reform agenda in the system for the past 20 years. The impact of attempts to address this so far has been limited, unfortunately (...) **I have reached the view that one of the biggest failings of the humanitarian system is that agencies do not pay enough attention to what people caught up in crises say they want, and then trying to give that to them.** It’s because despite all our good intentions, the humanitarian system actually is set up to give people in need what international agencies and donors think is best, and what the agencies have to offer, rather than giving people what they themselves say they most need.”<sup>22</sup> (Emphasis added)

Lowcock, during his speech, also stressed the fact that the international aid system will not change itself, but that **incentives and independent overview are critical to ensure structural accountability:**

“People’s needs are too easily dismissed due to lack of funding or needs being outside the scope of what individual organisations can provide. I think lack of funding makes it even more important that we deliver what people say they most want (...) (...) There is no incentive, really, not sufficient incentive to change. Ultimately, organisations or decision makers can choose to listen to people and be responsive, or they can choose not to. There aren’t really consequences for the choices they make. The incentives to push them in the right direction are too weak (...) There is no independent assessment of how agencies perform in this regard. Accountability runs mostly to the donors, not to the affected people.”<sup>23</sup>

In a similar vein, the April 2022 statement by the IASC Principals also acknowledged the limited progress made to ensure AAP. “Communities continue to report that we, the humanitarian community, need to better engage them in decision-making and, fundamentally, act on their feedback and needs to deliver community-led, relevant, dignified and timely responses”, the declaration by the leaders of 21 main UN agencies and international organisations stated.<sup>24</sup> Finally, the 2022 State of the Humanitarian System report also noted “little signs of agencies using feedback to adapt projects or providing meaningful opportunities for community decision-making.”<sup>25</sup>

### 3.2. UNHCR Lebanon's AAP commitments

In recent years, AAP has also been increasingly discussed by the Lebanon Humanitarian Country Team (HCT). In June 2022, the HCT reviewed key IASC priority areas and appointed an AAP Advisor to develop an action plan for collective AAP in Lebanon.

Meanwhile, as part of its Accountability to Affected Populations efforts, UNHCR Lebanon (as of December 2022) operates 25 Community Centres across the country, including 19 Community Development Centres and 6 Social Development Centres. In addition, UNHCR also engages 548 Refugee Outreach Volunteers (OVs), who provide UNHCR Lebanon with insights into community protection risks and priorities that inform UNHCR and partners’ programmes. As per UNHCR data, in 2022 these OVs

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<sup>21</sup> See

[https://static1.squarespace.com/static/62e895bdf6085938506cc492/t/63b6731e3196e461484dcecf/1672901413648/Annual\\_Report\\_GTS\\_2021.pdf](https://static1.squarespace.com/static/62e895bdf6085938506cc492/t/63b6731e3196e461484dcecf/1672901413648/Annual_Report_GTS_2021.pdf), p 3.

<sup>22</sup> See <https://reliefweb.int/report/world/what-s-wrong-humanitarian-aid-system-and-how-fix-it-remarks-under-secretary-general>. See also in this regard <https://www.groundtruthsolutions.org/news/systems-change-inside-and-out>

<sup>23</sup> See <https://reliefweb.int/report/world/what-s-wrong-humanitarian-aid-system-and-how-fix-it-remarks-under-secretary-general>

<sup>24</sup> See <https://interagencystandingcommittee.org/accountability-and-inclusion/statement-principals-inter-agency-standing-committee-iasc-accountability-affected-people>

<sup>25</sup> See <https://reliefweb.int/report/world/listening-not-enough-people-demand-transformational-change-humanitarian-assistance-global-analysis-report-november-2022>, p 9.



reached 636.109 refugees through 25.969 awareness-raising and information sessions and 12.899 home visits.<sup>26</sup>

UNHCR Lebanon and humanitarian actors also conduct participatory assessments (PA), which provides an overview of main concerns and risks facing refugees as well as their capacities to contribute to solutions that address these issues. Furthermore, in order to strengthen community participation in design, UNHCR has established 5 Community Reference Groups (CRGs) across Lebanon. According to UNHCR Lebanon, the 85 CRG members are consulted on the design of pilot UNHCR interventions and the content of communication material, such as draft Q&As, leaflets and videos. Recently, CRGs contributed to the design, development and naming of a self-help machine called Khadamaty that provides refugees in areas of their residence with UNHCR reception services, such as taking appointments, updating phone numbers and validating their presence in Lebanon.

According to UNHCR Lebanon's 2023-2025 strategy, the UN Refugee Agency aims to "further streamline Accountability to Affected people across sectors, to ensure a community-based, rights-based, and age, gender and diversity approach throughout the programmes, and informed programming by the views of forcibly displaced and stateless people." To further strengthen participation, communication and inclusion, the UNHCR strategy states that UNHCR Lebanon will (points below cited from the strategy itself<sup>27</sup>):

- Increase the extent of refugee participation and engagement, especially with respect to their role in the design and implementation of activities to address issues such as limited legal residency, child protection and mental health and psychosocial support.
- Continue to conduct participatory assessments with refugee women, girls, boys and men, of diverse backgrounds, as well as share findings with key stakeholders and during planning processes and provide feedback to the refugee community on how the results inform programming.
- Enhance the National Call Centre's capacity to receive calls, answer queries and refer people in need of protection to multisectoral services.
- Enhance information access to people living in remote locations, people with literacy challenges, people with disabilities and those who are homebound through expanding volunteer networks' reach and strengthening the role of community centres as information hubs.
- Further develop systems to collect and analyse feedback and complaints from refugee women, girls, boys and men of diverse backgrounds such as from community structures, participatory assessments, protection monitoring and complaints boxes and assessments with the aim to inform programmes, as well as track the extent of change across all sectors.
- Increase child protection and education activities, as well as promote child friendly feedback and complaints mechanisms.
- Enhance the different feedback and complaints systems based on an extensive review conducted by community-based protection for all UNHCR sectors, including by making them more sensitive and accessible to children and people with specific needs and diverse profiles.
- Further promote the inclusion of people with disabilities and older people within community centres, as well as continue to promote the participation of women and girls in community structures, which currently stands at 74%.

UNHCR Lebanon's 2023-2025 strategy furthermore outlines four "impact statements", including one statement related to AAP: "Affected populations are meaningfully involved in decisions that affect their lives, and engaged in finding local solutions and reducing social tensions." In order to reach this statement, the strategy defines three "outcome statements": 1) "Persons of concern are actively engaged in identifying, preventing, mitigating and addressing protection issues and have access to positive community practices, well-being and dignity", 2) "Persons of concern of different backgrounds, are meaningfully engaged in decisions that affect their lives, have access to timely information and their feedback informs programmes, activities and advocacy"; and 3) "Persons of concern are included in national services and feel safer in their host communities".<sup>28</sup>

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<sup>26</sup> See <https://reliefweb.int/report/lebanon/unhcr-lebanon-fact-sheet-december-2022>, p 3.

<sup>27</sup> See <https://reporting.unhcr.org/lebanon>

<sup>28</sup> See <https://reporting.unhcr.org/lebanon#toc-narratives>



However, UNHCR Lebanon’s stated ambitions to strengthen and increase its AAP efforts have not been matched by increased budgets. Apart from the fact that overall donor budgets have gradually shrunk in the past years, one can also observe a decrease within the part of UNHCR Lebanon’s budget that is specifically allocated for AAP-related work. The organisation’s 2023 budget has allocated 24.2 million USD for “community engagement” activities, or 4.32 % of the overall budget. Since 2019, the part of the UNHCR Lebanon’s budget allocated to AAP efforts has gradually shrunk, from 34.755 million USD in 2019, to 30.739 million USD in 2020, 30.381 million USD in 2021, 25.873 million in 2022 and 24.2 million USD in 2023. As shown in the below table, this gradual decrease has manifested itself both in absolute and relative terms.

*Budget allocated to Accountability to Affected Populations*

	Budget allocated to AAP (vs actual expenditure)	Total budget (vs actual expenditure)	% of AAP in overall budget
<b>2019</b>	34,755 (28,140)	562,760 (325,727)	6.18 %
<b>2020</b>	30,739 (22,265)	607,516 (332,202)	5.06 %
<b>2021</b>	30,381 (23.903)	554,413 (267.659)	5.47 %
<b>2022</b>	25,873 (NA)	534,326 (NA)	4.84 %
<b>2023</b>	24,200 (NA)	560,185 (NA)	4.32 %

Source: Own calculations based on information available on UNHCR Global Focus Lebanon website. All numbers in million USD<sup>29</sup>

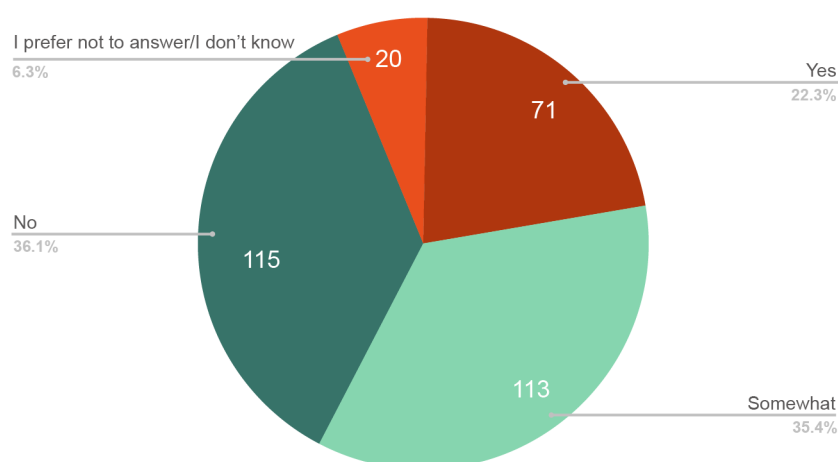
<sup>29</sup> See <https://reporting.unhcr.org/lebanon?year=2023#toc-financials>

## 4. DATA FINDINGS

### 4.1. Consultation on needs and preferences

Firstly, respondents in the online panel (n=319) were asked whether UNHCR listens to their voices when developing policy and programs. The answers were quite balanced. A little over one-third of respondents (36%) did not feel listened to, 35% felt “somewhat” included, and 22% did feel sufficiently listened to.

Figure 1. “Do you agree with the following statement: “I feel that while developing programs and policy, UNHCR listens to the voices of Syrian refugees, and they consult us directly (e.g. through meetings or Focus Group Discussions) or indirectly (they are aware of our priorities and preferences and try to incorporate these)?” - Syrian respondents (n=319).



When asking the respondents in the online panel who answered “no” to this question to explain the reasons in an open-answer format, over one-third of the respondents indicated UNHCR’s lack of response when reaching out for help. Other key reasons given included the limited aid respondents receive from UNHCR, the lack of responsibility UNHCR takes in protecting them, and the limited possibilities for direct contact with UNHCR, e.g. through appointments or field/home visits.

*“For me and my family, UNHCR is like a fortress. They never come to the field and meet with us, they never leave their office, they don’t even bother to reply to our phone calls. At times they call us for a phone survey, yes, but we never hear back from them about what they have done with the data they gathered. And it’s not like they ask for our specific input to design a project. Never. They just write their proposal from behind their desk, they decide for themselves what we refugees supposedly need. But we are the ones in need, so they should come to us and talk with us, not the other way around.” Female Key Informant (KI) volunteering for a Syrian Refugee-Led Organisation (RLO), Bekaa*

*“They don’t talk to us, they don’t ask us for our ideas on how to improve our own situation. If they are saying that they only do what the refugees tell them to do, they are lying” Male, 42, Bekaa*

*“UNHCR employees do not have the opportunity to listen, the conversations on the phone are quick and brief” Female, 46-55, Beirut.*

*“I filed a request more than once regarding persecution and difficulty of living. They have not responded to me for years.” Female, 26-35, North*

*“The conditions of refugees are not taken into consideration, aid is distributed without an in-depth study and its realities, and it is not possible to obtain a direct and explicit response when informing about the way UNHCR works” Female, 26-35, Akkar*

*"UNHCR did not communicate with us in anything, and when we communicate with them and express our requests to them, the answer is 'we cannot do anything for you.'" Male, 36-45, Baalbek-Hermel*

*"I am not aware of meetings or discussions with refugees to determine their priorities." Male, 46-55, Bekaa*

*"Because, for a long time, I have not seen anyone from the organisation that has come here to check the conditions of the refugees" Male, 36-45, North*

*"Because they do not carry out practical examinations and visits to know the situation closely" Male, 26-35, North*

Important to note is that, when asked why respondents do not feel that their voice is being heard by UNHCR, only a few respondents reported their lack of trust in UNHCR as the main reason. This corresponds with the finding of another Upinion conversation held in September 2022, when the majority of the Syrian respondents (62%, n=377) of the same panel indicated to trust/ prefer UNHCR the most as aid actor in Lebanon. The same sentiment was repeatedly voiced during the Focus Group Discussions conducted in January and February 2023, especially among women participants (n= 60 women participants).

For future consultations on their priorities, preferences, and feedback, over two-third of online respondents (65%, n=312) indicated their preference to receive phone calls, followed by communicating face-to-face with UNHCR volunteers (43%). Social media platforms (e.g. Facebook Messenger, WhatsApp, Facebook Live Session) were also indicated by one-fifth of the panel, and not surprisingly, relatively more by younger respondents (33% of people aged 18-25 compared to 19% of people aged 36-45).

In a similar vein, nearly all 115 respondents of the FGDs emphasised their willingness to participate in consultations by UNHCR on policies, frameworks, aid allocation, and strategies that concern them. Their most preferred way of being consulted is through house visits and phone calls. FGD participants' second most preferred method of consultation is through WhatsApp, as it is considered to be cost-efficient and reliable.

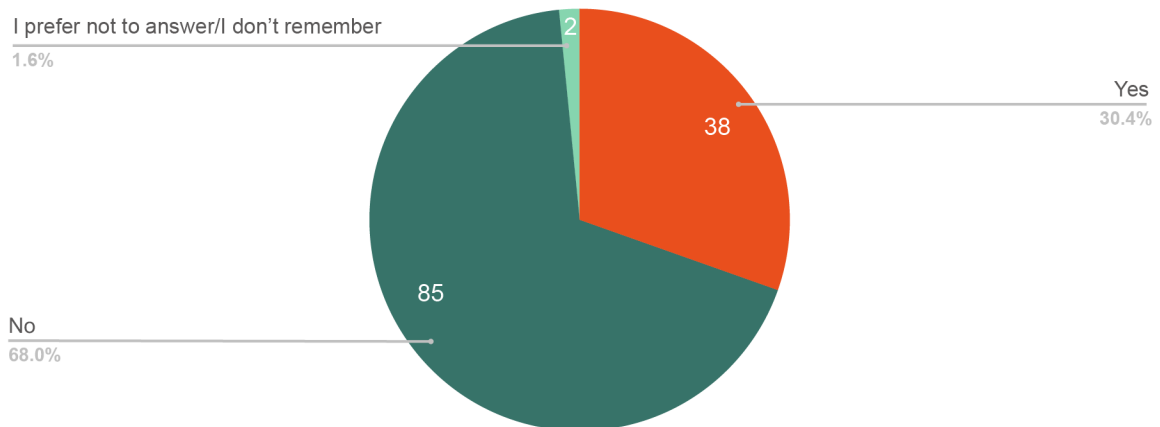
The need for more face-to-face engagement between UNHCR staff and refugees was also highlighted during KI interviews. *"The human element is really key, and I am not sure UNHCR totally gets that. People want to be listened to, they want to have a space to talk in, to feel more closely connected. Either face-to-face, and if this is not feasible at least through digital means such as WhatsApp or videoconferences"*, one INGO KI explained. As described by several KIs, however, UNHCR sub/field office staff rarely leave their offices to come to the places where refugees live, instead relying on sending out text messages and giving refugees appointments at the UNHCR office.

## **4.2. Understandable, respectful and two-way communication**

Amongst the respondents to Upinion's online panel that said they have received cash assistance from UNHCR at some point since 2011, 61% (n=206) indicated to have received a message from UNHCR informing that cash assistance was reduced or cancelled.

A vast majority (68%) of those who received such a message indicated they did not receive an understandable explanation from UNHCR about why this decision was taken. However, remarkably, people in Bekaa (42%, n=125) more often reported that they received an understandable explanation, compared to people living in other areas where approximately 25% indicated this.

Figure 2. “Did you receive an understandable explanation from UNHCR about why the decision was taken to reduce or cancel your cash assistance?” - Syrian respondents (n=125)



Similarly, none of the 115 people participating in the FGDs in Nabaa, Shatila and Tripoli indicated they understand the criteria based on which the UNHCR suspends individuals from financial or food aid, as they would just receive an SMS from the UNHCR stating that they are no longer eligible for aid, without justification. A perceived lack of fair criteria for aid allocation among the Syrian community was reiterated in all FGDs. It was evident that respondents were not aware of aid eligibility criteria and confused about the vulnerability determination procedures.

When asked how to address these issues, the need for more frequent needs assessments, mainly through house visits, and subsequent updating of beneficiary lists, were mentioned frequently. FGD participants shared stories of sick household members or other vulnerable house situations that are impossible to gauge through online and phone assessments alone. Furthermore, respondents requested an expansion of eligibility criteria, to prevent vulnerable people in need from falling through the cracks.

*“Last week, UNHCR sent us a text message that we’ll be cut off altogether, from the beginning of 2023 onwards. Their message included a website link and a phone number, but did not properly explain why we are cut off. I am not going to contact them, I don’t see the point. First they send a message telling me I won’t get any aid, and they say I should call them if I need help? We never see them, we never hear them. For us UNHCR is just a text message.” Woman, 26-35, Bekaa*

*“Since arriving in Lebanon in 2014, I have received five text messages informing me that my cash assistance would be cut. I don’t understand on which grounds they base these decisions. On the basis of which methodology do they consider that I am not sufficiently vulnerable? I called UNHCR multiple times to complain, and told them to come watch my situation with their own eyes. But instead of coming out of their offices, instead of coming to visit us in the field, UNHCR only communicates with refugees through text messages. How can they do a proper project or evaluation if they have not visited me in eight years?” Male, 42, Bekaa*

*“They told me you will receive both financial aid and winter aid, but then they both stopped. I called to ask why, I still don’t know why” Nabaa, Female*

*“I received cash assistance for three months in 2022, then was suspended from it. They told me I’m not eligible for winter aid even though I’m suspended from cash assistance. When I asked them why, they said YOU ARE NOT ELIGIBLE. That’s it, no further explanation was given.” Nabaa, Female*

In terms of respectful communication, 50% of all respondents to Upinion’s online panel indicated that UNHCR Lebanon’s materials (brochures, website, etc.) are sufficiently respectful towards different cultures and values and accessible to all members of their community. This is followed by 30% who indicated they were not sufficiently respectful, and 20% who did not know.

Those who reported that UNHCR Lebanon’s materials were not sufficiently respectful (n=91), were asked for suggestions for improvement. The main recommendations suggested by respondents were about UNHCR employees being more respectful and aware of the situation; and who should undertake more efforts to directly reach out to refugees, for example through home visits. Clearly, respondents’ suggestions to this question were overly focused on person-to-person engagement rather than on UNHCR Lebanon materials, seemingly indicating their strong preference for direct contact with UNHCR.

*“The communication must be intensified and more time is needed in order for the refugee to explain all the problems we face” Male, 36-45, Mount Lebanon*

*“They should communicate with refugees and then develop brochures to educate refugees. Because, since the beginning of the war, we are homeless and we have not received any brochures” Male, 36-45, Bekaa*

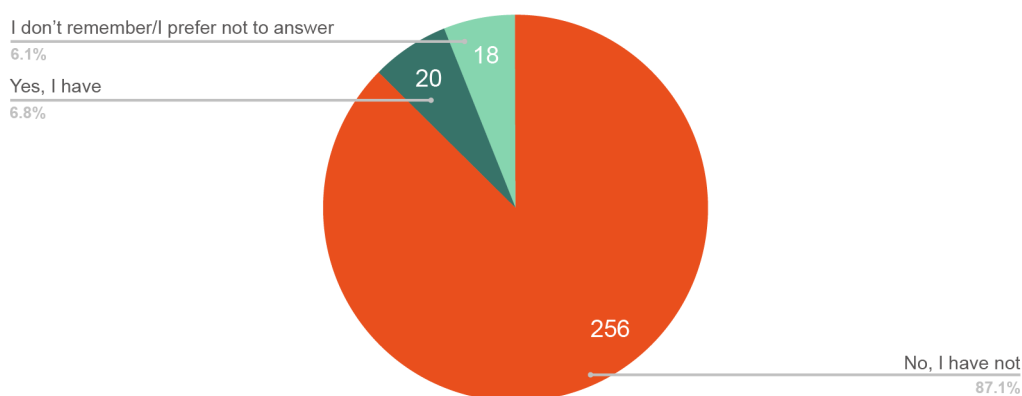
*“It is preferable that communication with UNHCR is free of charge, not paid. And the employees must be more cooperative with the refugees.” Male, 26-35, Beirut*

### 4.3. Feedback and complaint mechanisms

#### 4.3.1. Feedback mechanisms

When being asked whether respondents have ever been asked to give feedback to UNHCR Lebanon in the past (e.g. after they participated in a UNHCR-led project on education, vocational training, protection, psychosocial support, or other humanitarian themes), 87% indicated they were never asked to do so.

Figure 3. “Have you ever been asked to give feedback to UNHCR Lebanon in the past?” - Syrian respondents (n=294)



The majority of FGD participants also indicated that they have never been consulted by someone from UNHCR or its outreach volunteers on how to improve aid and programs.

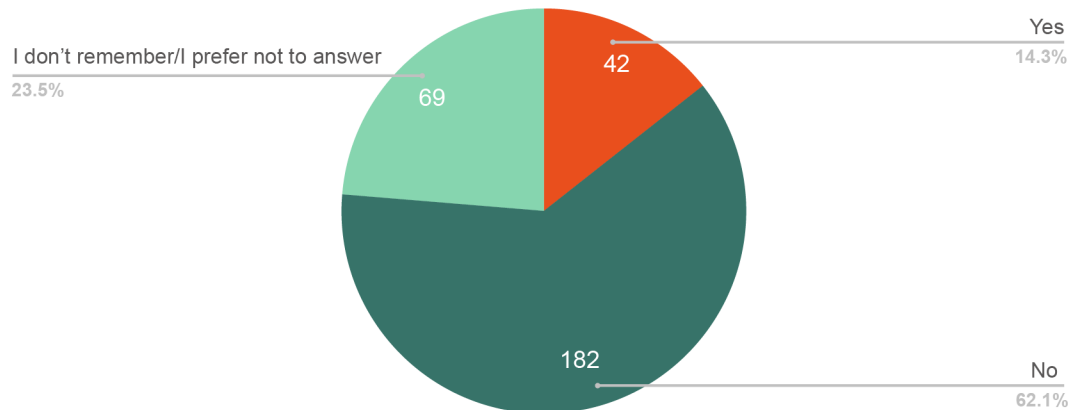
Moreover, several KIs emphasised the need for more independent, third-party monitoring of UNHCR Lebanon’s projects and programmes. UNHCR’s post-project satisfaction surveys were considered by one KI who works for an INGO as “processes set up to validate what UNHCR is doing anyway, rather than a tool to identify errors and ways to improve.” Three INGO KIs also pointed to an inherent bias when such surveys are conducted by UNHCR staff, as refugees might hold back on openly criticising UNHCR out of fear

(rightly or not) that this might negatively impact their future access to aid. In order to remedy this, KIs suggested that UNHCR would consider to work more with external third-party evaluators.

### 4.3.2. Complaint mechanisms

Two thirds (62%) of all online respondents reported that they do not think UNHCR’s complaints mechanisms, such as physical complaint boxes, are sufficiently accessible, effective and safe to use. 14% did think complaints mechanisms are sufficiently accessible, while 26% did not know.

Figure 4. “Do you think that UNHCR Lebanon’s complaints mechanisms are sufficiently accessible, effective and safe to use?” - Syrian respondents (n=293)



In addition, all 40 female FGD respondents in Shatila and Nabaa mentioned that they were either unaware about how to file a complaint to UNHCR, or that they consider the existing procedures to be very complicated and not straightforward. Moreover, FGD participants in Tripoli highlighted being uncomfortable with filing a complaint, and expressed their fear that filing a complaint against UNHCR might result in negative repercussions, although none of the respondents had actually heard of someone being effectively cut from aid after filing a complaint. FGD respondents who had filed a complaint in the past did however report that they were not followed up with after submitting the complaint.

*“They [UNHCR] are our source of aid and refuge, and we don’t want to be blacklisted or banished from the UNHCR.” Female & Male respondents Tripoli & Nabaa*

*“We don’t want to seem ungrateful, we need UNHCR.” Female respondents, Tripoli*

### 4.4. Satisfaction with UNHCR services

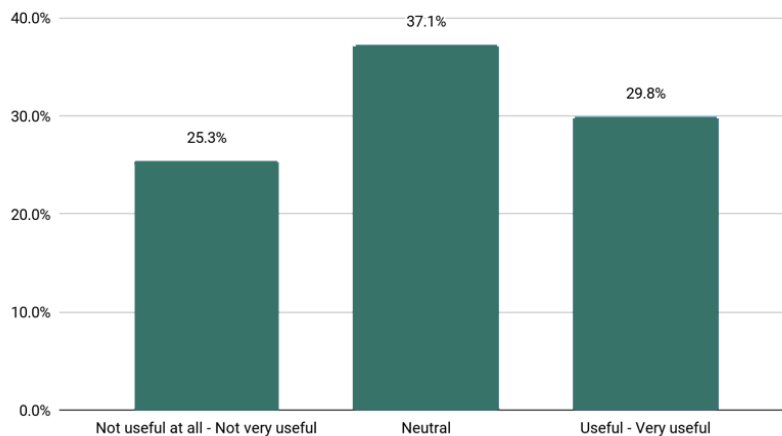
To gauge the satisfaction of respondents with specific UNHCR services, participants to Upinion’s online panel were asked to rate their satisfaction with different services, including the UNHCR website, UNHCR National Call Centre, UNHCR Lebanon’s Community Centres, and UNHCR Lebanon’s ‘Refugee Outreach Volunteers’. As one of the answer options, they could also indicate that they never made use of the service in question.

Overall, results show a concerning trend in respondents’ limited participation in or familiarity with UNHCR services. Those who made use of the service before mainly provided neutral or positive answers. This is, however, with the exception of the UNHCR National Call Centre, which is well-known and was rated more negatively by respondents.

#### 4.4.1. UNHCR website

Results show that 41% of all online respondents never visited UNHCR’s website. Amongst people who had visited the website, the largest share of respondents rated it as ‘Neutral’ (37%), followed by ‘Useful - very useful’ (30%) and ‘Not useful at all - not very useful’ (25%). - 8% indicated it is ‘better not to answer’.

Figure 5. “Can you rate your satisfaction with the following UNHCR website [https:// www.refugees-lebanon.org/ar/site/index?](https://www.refugees-lebanon.org/ar/site/index?)” - Syrian respondents (n=178)

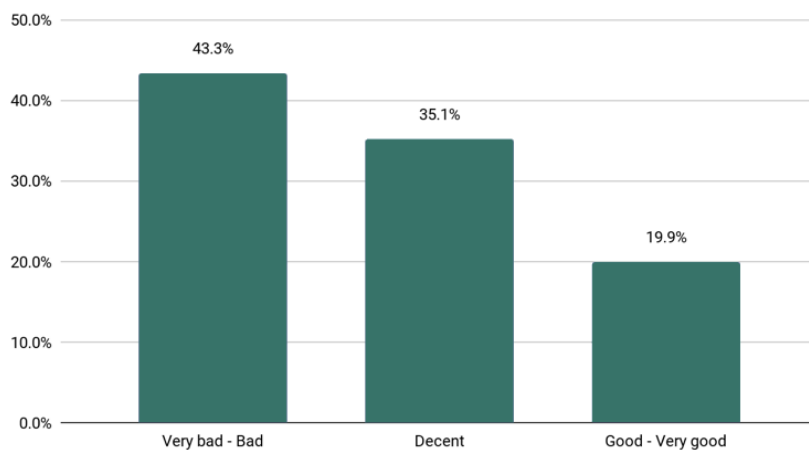


#### 4.4.2. UNHCR National Call Centre

Amongst those who used the UNHCR hotline before, approximately 43% of online respondents (n=291) rated their satisfaction with the hotline as “very bad” or “bad”. 35% of the panel rated their satisfaction as ‘Decent’, while 20% considered the performance of the Call Centre to be “good” or “very good”.

Noteworthy is that only 4% (n=304) reported to not have used the UNHCR hotline before, indicating more familiarity with the hotline than with UNHCR’s website. This is in line with the findings presented in the previous section, which show people highly prefer direct communication, e.g. through receiving phone calls.

Figure 6. “How would you rate your satisfaction with UNHCR National Call Centre 01-903014, the hotline for Syrian refugees in Lebanon for questions and queries?” - Syrian respondents (n=291)



Moreover, six respondents of the FGDs in Shatila reported experiencing bad attitudes from hotline employees telling them to stop calling. The following quotes - primarily given by online respondents who were making recommendations on including their voice and improving UNHCR services - further highlight the difficulties respondents are facing when trying to reach UNHCR by phone:

*"I repeatedly ask for assistance from the UNHCR. Unfortunately, the line is always busy, or they open a line and no one responds until we run out of credit" Female, 26-35, Akkar*

*"When we call them, they do not answer the phone and we lose the full balance of the phone" Male, 26-35, Beirut*

*"I try to call a number of times, but no one answers, and when someone answers me, he speaks to me in a rude way" Male, 26-35, South Lebanon*

#### 4.4.3. UNHCR Lebanon's Community Centres

Amongst those who were familiar with the projects and activities of UNHCR Lebanon's community centres, the largest two shares of respondents rated it as 'Neutral' (35%, n=174) or 'Good' (28%).

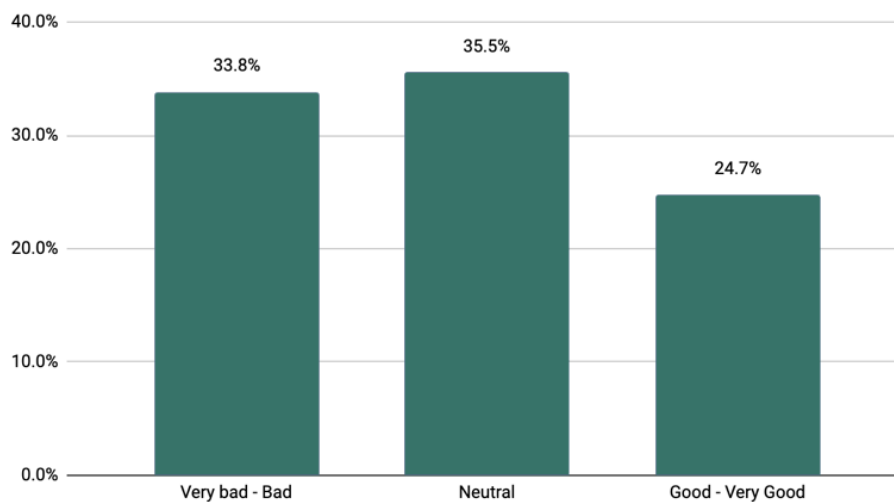
Further analysis reveals that 53% (n=124) of the respondents who have not participated in projects and activities in community centres, also indicated to have never received legal aid from UNHCR.

#### 4.4.4. UNHCR Lebanon's 'Refugee Outreach Volunteers'

When being asked to rate their satisfaction with the performance and accessibility of UNHCR Lebanon's Refugee Outreach Volunteers, 23% (n=301) indicated to not know as they did not know a Refugee Outreach Volunteer. Amongst those who were familiar with the Refugee Outreach Volunteers, a plurality rated their satisfaction as 'Neutral' (36%, n=231), followed by a nearly equal number of individuals rating it as very bad or bad. Only 4% rated their satisfaction as 'Very good'.

Of the 115 respondents that participated in the FGDs, none of the respondents had been visited by or had engaged with UNHCR volunteers within the last 6 to 8 months.

Figure 7. "How would you rate your satisfaction with the performance and accessibility of UNHCR Lebanon's 'Refugee Outreach Volunteers'?" - Syrian respondents (n=231)





#### 4.4.5. Physical access to UNHCR facilities

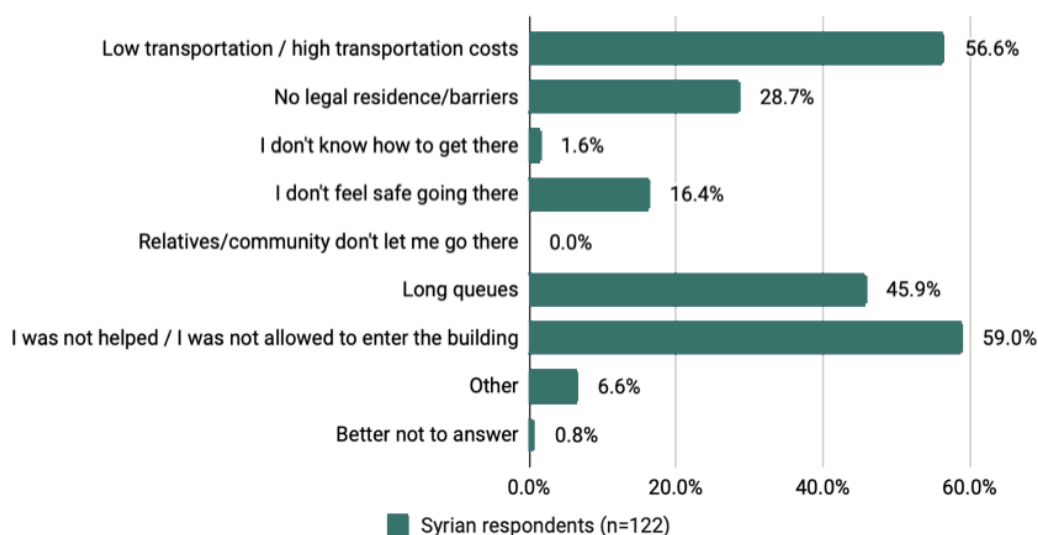
When being asked whether respondents face any specific challenges/barriers to physically access UNHCR field offices, community centres, or other UNHCR facilities, the answers were quite balanced.

While 37% (n=302) answered to have never experienced any specific challenges, 40% indicated to have encountered issues. Half of the older respondents (aged 46-55, n=37) and a majority of people residing in Bekaa (57%, n=49) reported the latter.

The main reasons for limited accessibility were said to be the lack of assistance or the refusal to enter the building (59%), the lack of transportation/high transportation costs (57%), and long queues (46%).

Remarkably, 35% of male respondents indicated the lack of legal residency as an issue when trying to access UNHCR facilities, compared to 15% of female respondents.

Figure 8. "What challenges have you encountered when trying to physically access one of the UNHCR facilities?" - Multiple Answer - Syrian respondents (n=122).



#### 4.4.6. UNHCR-affiliated stores: "Matjar"

UNHCR has introduced a new method for Syrian refugees to receive food assistance in the form of electronic food vouchers, known as the "red card". This red card has financial credit and is only valid to use in stores affiliated with UNHCR, referred to by respondents in the FGDs as "Matjar".

According to a Key Informant (KI) interview conducted in March 2023, the "red card" is divided into three main electronic 'wallets': a "Point of Sale" (POS) wallet, a Multi-Purpose Cash Assistance (MPCA) wallet, and a third wallet that is only activated for specific purposes such as winterization assistance. The POS system, which is essentially the electronic food voucher, can only be used at specific stores that are contracted by UNHCR (*Matjars*) to accept this form of payment, and can only be used to buy specific items, such as basic food and hygiene items.

Often, when beneficiaries receive both types of assistance – the POS as well as the MPCA – they are able to use the MPCA as they choose, for instance to cover rent and medical expenses or to complement the food items they are able to buy through the POS wallet. However, issues arise when beneficiaries are cut off from MPCA, and are only given assistance in the form of the POS (electronic food voucher), and therefore have restricted spending with regards to food items, what food items they are able to buy, and where they are able to buy these food items.

A considerable share of respondents in the FGDs indicated they depend on the *Matjar* system for food aid. 40% (n=20) women and 26% of male (n=20) FGD participants in the Nabaa area reported that they have been cut off from MPCA. In Tripoli, 40% of male participants (n=20) and 100% (n=20) of women participants reported also not currently receiving MPCA. In Shatila, 50% of women participants (n=20) and 40% of male participants (n=15) reported to currently not receive financial aid. All these aforementioned respondents, totalling 57 FGD participants in total (n=115) reported not receiving MPCA and only receive assistance in the form of the electronic food voucher, which limits their consumer choices and does not allow them to buy goods from outside the contracted stores.

A popular demand among all participants of the FGDs (n=115) was to provide financial support in the form of a more robust MPCA, rather than just the electronic food vouchers, and to put an end to the *Matjar* alternative (stores contracted by UNHCR), as they consider it a limiting and exploitative option.

Moreover, respondents have clearly highlighted the price discrepancies of essential goods and food between regular supermarkets and the contracted *Matjars*, noting that they are often double or triple the normal price, and where prices are randomly controlled by the *Matjar* owners. The KI interview conducted in March 2023 confirms this finding, and noted that UNHCR does often conduct internal price analyses of the various contracted stores, however little action is taken to control the fluctuating prices at these stores. This is especially dangerous for those individuals who only receive food aid and not MPCA, as their consumer choices are extremely limited.

*"We wish the UNHCR would go back to giving us financial aid instead of being obliged to receive aid through these limited stores. If we receive financial aid each month in USD we can have the freedom of selecting goods from cheaper stores, and the USD is a safe option, so we don't have to worry about it completely losing its value." Female respondent, Nabaa*

*"We used to receive 27 USD for each family member, now it's converted to Lebanese pounds (LBP) and for all family members, up to 6 family members and it's not enough for anything. Now we receive only food aid from Matjar." Nabaa, Female*

*"The Matjar is taking away our power of choice to buy cheaper from other stores. The prices of oil and bread have doubled or even tripled in Matjar stores. The owners can see our financial credit using the red card given by the UNHCR and extract from it whatever they want without us knowing. They are taking advantage of us because we are Syrians perceived to have money in US dollars." Nabaa, Female*

*"The UNHCR should investigate these Matjar owners and the tripling and doubling of prices at their stores." Male, Nabaa*

*"We feel financially exploited and controlled by Matjar owners." Female, Nabaa*

One male respondent in Nabaa revealed being threatened by the *Matjar* owners when he asked them to check the bill.

#### 4.4.7. Legal advice

The online panel was additionally asked: “Have you received legal advice from UNHCR before or discussed your legal status with them before (legal aid/counselling)? If yes, how would you rate their advice and/or help?”

Approximately one-third of all respondents indicated to have never received legal advice or counselling. The answers of those who did were relatively balanced: over 40 per cent (n=193) rated UNHCR’s legal aid with ‘Very bad’ or ‘bad’, followed by 28% that indicated ‘Neutral’ and 23% that indicated ‘Very well’ or ‘Good’.

Interestingly, male respondents seem to rate their satisfaction with legal aid more negatively than female respondents: 48% of male respondents answered ‘bad’ or ‘very bad’, versus only 24% of female respondents.

#### 4.5. Suggestions on the improvement of UNHCR services

All online respondents were further asked whether they have suggestions for the improvement of UNHCR services, using an open-answer question format.

In line with findings above, the plurality of online respondents indicated that frequent home visits and monthly calls would improve the quality of UNHCR services.

Remarkably, respondents in the FGDs repeatedly voiced that they felt they were not ensured the rights they are entitled to as refugees under international law. People were comparing their living conditions to what they know about Syrian refugees living in Turkey and Jordan, and repeatedly expressed their frustration.

Answers furthermore made clear that services should be fair and transparent. Particularly, it was mentioned that more services need to be provided to those living outside of the informal camps, as well as to older people.

*“For most volunteers in legal programs and humanitarian aid in Lebanon, their main interest is the refugees residing in the camps.” Female, 26-35, Bekaa*

*“UNHCR must take into account the elderly first, because the elderly suffer from health problems. They cannot buy medicines. It is better to treat them outside Lebanon, if this is possible, because the price of medicines in Lebanon is very high. So, we suggest UNHCR to issue medical cards, supported by the UNHCR, so that patients can be treated.” Male, 36-45, Mount Lebanon*

Others suggested improving the aid and its effectiveness, reducing waiting times, and ensuring that UNHCR employees are respectful, well-trained, and motivated.

*“The most important thing is to support the volunteers and increase the cash allowance for them so that they can complete the work in light of the current conditions.” Male, 46-55, Bekaa*

*“The eligibility of employees must be checked, to [see if they can] effectively follow up on the situation of people in need. Most cases have been dealt with great negligence by UNHCR staff, as well as people who were treated with superiority, arrogance, and racism. Please closely monitor the employees and issue a warning if they do not treat people in a humanitarian manner.” Male, 26-35, Baalbek-Hermel*

*“The UNHCR hotline employees talk to us like they are tired of us and are always in a rush.” Males, Nabaa*

*"If we call the UNHCR, we hear the music for 15 minutes and we lose phone credit waiting for someone to pick up the phone. If you want to improve the UNHCR services, first remove the music. Then answer the phone and be responsive to Syrian refugees." Female, Beirut*

Specifically for feedback and complaint mechanisms, respondents to Upinion's online panel recommended UNHCR to seek more direct engagement, for example by doing home visits or monthly calls. Especially with regard to the latter, it was mentioned that UNHCR's hotline needs to be free of charge, more accessible, and immediately connected with the person that is responsible for their file, request, or complaint.

These recommendations were further complemented by ideas on setting up a separate and adequate team to answer complaints, having refugee intermediaries, using social media or other chat services, and implementing cost-effective communication methods such as email.

### **Home visits**

*"Visit the homes and ask about refugees' complaints." Female, 26-35, Mount Lebanon*

*"By forming committees that meet with all people in their homes or invite them to one of the UNHCR centres and hear their complaints. I think it will be more transparent and realistic than phone calls." Male, 36-45, Mount Lebanon*

*"Sit down with refugees every three months, listen to a large number of refugees, ask them questions, and search for appropriate solutions that both help the refugee and UNHCR in solving the difficult situation. In this way, you will regain confidence in UNHCR." Male, 18-25, Baalbek-Herme*

### **Phone calls**

*"Respond to the hotline, provide enough time to hear the complaint, submit it to the competent authority, intensify working hours, and visit the homes." Female, 46-55, Beirut*

*"Make the hotline free, now the phone connection is very costly." Male, 26-35, Mount Lebanon*

*"Allow for phone calls with a directly responsible person, not just employees. Because they often do not have any information and we cannot ask them questions about something about our file. And when our file is under study to resettle or we can receive help, they do not give us an answer. Every time we hear the same answer." Female, 26-35, Mount Lebanon*

*"Increased phone lines for complaints and put a permanent hotline at all times for complaints." Male, 36-45, Bekaa*

### **A separate team to answer complaints**

*"An actual team must be formed to study complaints and solve them immediately, not to procrastinate." Male, 26-35, Beirut*

*"It must be a group of UNHCR employees from outside Lebanon to follow up on complaints." Female, 26-35, Bekaa*

*"Committees specialising in responding to complaints electronically and relieving pressure on centres." Female, 26-35, Bekaa*

*"Special offices for UNHCR must be opened in each region to file complaints." Male, 26-35, Bekaa*

*"If I'm complaining about an employee, the same employee can't be present during the call and answer the call. We need a separate phone line to report incidents or behaviour of UNHCR employees, directly to their superior in a confidential manner." Female, 19-65, Nabaa*

### **Refugee intermediaries**

*"The solution is to find a honest and qualified refugee in every region who listens to our problems and who communicates our voice, so that UNHCR is able to protect us in this society." Male, 36-45, Mount Lebanon*

*"By employing some young men in various regions, communicating correct information via social media and helping to communicate people's pain to UNHCR." Male, 26-35, Bekaa*

*"Make use of volunteers who are from the area of operation, and who are nominated by other refugees from that area." Female, 36-45, Akkar*

### **Social media or text-messaging**

*"Customise the phone number and make it possible to send complaints via WhatsApp." Male, 26-35, North Lebanon*

*"The use of social media such as WhatsApp and Messenger to file complaints." Male, 46-55, Bekaa*

*"I hope that it will be a special program for complaints through text messages and increased phone numbers of UNHCR. The person can write a complaint and be answered immediately and take information about his file if he is under study or benefits from aid." Respondent 36-45, Mount Lebanon*

*"Talking to the UNHCR through WhatsApp is the best way, it is fast, reliable and cost-efficient. But we need to have a stable internet connection" Male,30-55, Nabaa*

### **Cost-effective communication strategies (i.e. email)**

*"It is possible to improve responding to complaints via refugee email for those who send an email regarding suspicion or obtaining protection. As for help, it is preferable to respond through these emails with a phone call." Female, 26-35, Bekaa*

*"Please improve the email service because it is the least costly, the fastest and it does not cause crowding." Male, 36-45, North Lebanon*

# 5. RECOMMENDATIONS

In order to ensure more participatory, transparent, responsive and learning AAP, Refugee Protection Watch offers the following recommendations to donor governments, UNHCR Lebanon, the UN Humanitarian Country Team (HCT) and the UN Resident Coordinator/Humanitarian Coordinator (RC/HC), and UN OCHA Lebanon.

## TO DONOR GOVERNMENTS

- Provide additional funding for UNHCR Lebanon's AAP efforts, and for collective AAP in Lebanon as a whole.
- Include AAP-specific indicators and benchmarks in project requirements. Require grantees to listen to affected people and to report on how they respond to what they learn.

## TO UNHCR LEBANON

- **Develop an AAP Strategic Framework and AAP Guide:**
  - Develop a new AAP Strategic Framework for UNHCR Lebanon. Engage Refugee-Led Organisations (RLOs), refugee practitioners and refugee communities as equal thought partners in the design and implementation process of such a framework.<sup>30</sup>
  - In order to implement such a new Strategic Framework, develop an AAP Guide for integrating AAP activities into programming, which includes recommended actions and indicators for mainstreaming AAP in programmes, as well as lessons learnt and best practices.<sup>31</sup>
- **Increase the proportion of the budget allocated to AAP activities in UNHCR Lebanon's annual budget and planning:**
  - Increase the share of the AAP budget in UNHCR Lebanon's annual budget.
  - Include a budget for AAP staff and activities in each project proposal and organisation's operational budget. Budgets should cover, at minimum, staff dedicated to managing a feedback system; AAP focal points; creating and maintaining feedback mechanisms; creating and disseminating information materials for project participants; and community engagement activities.
- **Bridge the gap between UNHCR offices and refugees:**
  - Expand the number of UNHCR sub and field offices, with a particular focus on under-served areas such as Baalbek and Hermel. Explore the possibility of using mobile field offices.
  - Require staff (including in their job description) to spend a minimal amount of their working hours outside the office (including house / ITS visits), to consult and discuss directly with refugees themselves.
  - Explore the use of innovative data collection tools for identifying the needs and priorities in the communities, like the "Community Perception Tracker" (CPT), which has been successfully piloted by Oxfam International.

<sup>30</sup> For an example of how such framework could look like, see <https://reliefweb.int/report/afghanistan/accountability-affected-people-aap-afghanistan-strategic-framework-august-2020>.

<sup>31</sup> For an example of how this could look like, see [https://fscluster.org/sites/default/files/documents/aap\\_guidance\\_for\\_cluster\\_partners\\_seeking\\_ahf\\_grants\\_november\\_2021.pdf](https://fscluster.org/sites/default/files/documents/aap_guidance_for_cluster_partners_seeking_ahf_grants_november_2021.pdf)

- Critically evaluate the performance of the UNHCR phone hotline, and allocate more resources for its improvement, such as: reducing wait times, hiring more human resources to operate the hotline, and ensuring a more effective phone screening system for incoming cases and complaints. Explore ways in which the hotline can be made toll-free. Ensure that information received through the hotline is directly disseminated to the relevant office's AAP focal point.
- Establish a system to listen, collect, analyse, respond to and act on feedback and complaints, and communicate back to refugees about how their feedback was used.
- Expand the use of mobile “self-service kiosks”, mobile applications or other digital communication channels to enable individuals to update their address, telephone or other regularly changing registration information, without having to approach a UNHCR office.<sup>32</sup>
- Provide cash support for transportation to UNHCR offices.
- Organise more town hall meetings in areas with a high density of Syrian refugees, as well as video conferences where refugees can directly interact with UNHCR staff on relevant policy updates pertaining to the provision of services, processes of policy updates, relevant casework, etc.
- As foreseen in UNHCR Lebanon's 2023-2025 strategy, increase the number of UNHCR Refugee Outreach Volunteers (ROV) and provide them with training on AAP-sensitivity skills. Expand the scope of the ROV network and mandate beyond its current activities, for example by giving the participants more power to record cases and make note of complaints, and to be a medium of relaying and collecting relevant information to and from the community. Make sure that participants in the program are also provided a stipend or incentive for their labour, as they are members of the affected community.
- Make better use of existing refugee social media pages for specific areas, and invest sufficient resources to ensure a two-way communication dynamic on these channels (instead of only posting general messages on social media and not properly following up on comments).
- Explore scenarios in which refugees can use WhatsApp and other social media channels to request information, provide feedback or file a complaint.
- Roll out an awareness-raising campaign on UNHCR Lebanon's AAP tools, and to increase awareness about the existence of UNHCR's Community Development Centres and of UNHCR's website.

- **Prioritise AAP in internal staffing procedures:**

- Appoint dedicated AAP officers/focal points at both HQ and sub/field office level.
- Provide specific AAP training courses to all UNHCR Lebanon staff.
- Ensure that terms of reference and job descriptions for all staff working on projects explicitly include implementing two-way communication activities between participants and staff and bringing refugees' comments to programme planners in the organisation.
- Include AAP-specific targets and indicators in annual work plans for UNHCR staff members.
- Include AAP-specific targets and indicators in evaluation procedures of UNHCR staff, as well as in performance plans of UNHCR Lebanon's management.

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<sup>32</sup> See <https://www.unhcr.org/registration-guidance/chapter8/continuous-registration-in-unhcr-operations/>

- **Improve planning, monitoring and evaluation practices:**
  - Conduct a bi-annual external and independent evaluation of UNHCR Lebanon's AAP policies and practices, based on a large-scale perception survey among Syrian refugees in Lebanon. Ensure that the findings of such evaluation are fed back to refugee respondents, and involve them in a two-way process to identify action points to improve UNHCR Lebanon's performance.
  - Expand, in future Vulnerability Assessments of Syrian Refugees in Lebanon (VASYRs), the number of AAP-specific questions; and publicly report on action points through which UNHCR intends to turn the feedback received from refugees into tangible action.
  - For specific projects, make more use of satisfaction surveys that are conducted by third-party actors (including local CSOs and Refugee-Led Organisations (RLOs), in order to tackle potential survey bias.
  - Incorporate perception questions into all assessments so that perceptions of refugee communities on assistance received can be systematically tracked over time.
  - Involve local CSOs and RLOs in monitoring processes.

### **TO THE UN HUMANITARIAN COUNTRY TEAM (HCT) AND RESIDENT COORDINATOR/HUMANITARIAN COORDINATOR (RC/HC)**

- **Intensify efforts to mainstream AAP throughout the UN system in Lebanon:**
  - Establish an AAP Working Group within the UN's sector system in Lebanon, and ensure that such Working Group is coordinated by a full-time staff member. Ensure that a diverse set of Refugee-Led Organisations (RLOs) are systematically included in the proceedings and decision-making processes of this Working Group, and regularly invite representatives from refugee communities for a two-way discussion.
  - Actively encourage a more diverse number of representatives of local CSOs and RLOs to attend sector meetings and participate in decision making.
  - Make AAP needs, activities and findings a standing item on HCT and sector meeting agendas, and have AAP as an early agenda item in such meetings.
  - Find ways for community voices to be more included in sector meetings (inviting community representatives to present, film/audio messages, written messages, regular simple surveys etc).

### **TO UN OCHA LEBANON**

- Stipulate that partners that implement activities funded by the Lebanon Humanitarian Fund (LHF) are required to describe how affected populations and specific beneficiaries have been and will be involved throughout the project cycle. Ensure that LHF reporting and monitoring procedures verify how this has been applied.
- Increase representation of local CSOs and RLOs on the LHF Advisory Board.





May 2023