



FINAL REPORT

The Norwegian Refugee Council

Jordan

**Integrated Urban Shelter and
Information Counselling and
Legal Assistance Programme
(ICLA)**

Table of Contents

<i>Table of Contents</i>	2
<i>List of abbreviations and acronyms</i>	3
<i>Acknowledgements</i>	4
<i>Executive summary</i>	5
<i>Context</i>	15
<i>Evaluation findings</i>	19
Relevance/Appropriateness.....	29
Coverage	52
Efficiency / effectiveness	57
Impact	70
Sustainability.....	82
<i>Annex 1 – Terms of Reference</i>	86
<i>Annex 2 - List of stakeholders consulted</i>	96
<i>Annex 3 – Evaluation matrix</i>	99
<i>Annex 4 - Discussion of the methodology and tools</i>	107
<i>Annex 5 – Focus Group Discussion consolidated results</i>	114
<i>Annex 6 – NRC staff peer consultations consolidated results</i>	126
<i>Annex 7: Evaluator biographies</i>	132

List of abbreviations and acronyms

BoQ	Bill of Quantity
FGD	Focus Group Discussion
HU	Housing Unit
ICLA	Information, Counselling and Legal Assistance
JRP	Jordan Response Plan
MOH	Ministry of Health
MOI	Ministry of Interior
NRC	Norwegian Refugee Council
UNHCR	United Nations High Commissioner for Refugees
VAF	Vulnerability Assessment Framework



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This evaluation was conducted by Notio Partners, an international development consultancy firm which specialises in human rights and organisational development issues.

The evaluation team was comprised of:

- Mark Aiken – a lawyer and access to justice expert with experience working in Jordan and the Middle East on legal assistance issues.
- Caroline Dewast – an architect and shelter expert with experience working in the Middle East on shelter issues.

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The conclusions expressed in this report are those of the evaluation team, who take full responsibility for them.

Executive summary



Background

This evaluation reviews NRC Jordan's integrated urban shelter / ICLA programme.

The programme provides shelter assistance to Syrian refugees living outside of camps in Jordan. Shelter assistance is mostly provided through NRC paying a contribution to Jordanian landlords to enable them to complete partly completed properties, in return for leasing the property rent free to a Syrian refugee family for up to 18 months. Recently, NRC has commenced a programme to provide moderate property repairs of Syrian refugee's current property, without the need to relocate them to a new property.

At the same time, NRC's ICLA programme provides complementary support. The ICLA team has developed revised model lease agreements, and visits the beneficiary to ensure they are enjoying security of tenure, to provide basic information on access to services, and to provide information and counselling e.g. on obtaining legal identity and civil documentation. Where disputes exist between the landlord and beneficiary, ICLA offers Collaborative Dispute Resolutions services to negotiate or conciliate these disputes.

The field phase of this evaluation took place during August – September 2015 in Amman, Irbid, Jerash and Ajloun, Jordan.

Scope and objectives

The evaluation is a learning evaluation, which will be used by NRC to inform Shelter and ICLA programme strategy and adjustments in Jordan, in addition to contributing to NRC's global body of knowledge. The evaluation aims to identify programme achievements, identify potential programme improvements, identify areas where further research may be required, and encourage sharing of best practices.

The scope of the evaluation is to cover the integrated shelter/ICLA program in support of displaced people from Syria, which has been implemented in the Northern Governorates of Jordan (Irbid, Jerash and Ajloun) since 2013. The evaluation scope covers NRC's work in communities, and does not cover NRC's programmes in refugee camps.

The evaluation provides a response to the following lines of enquiry:

- To what extent does the programme ensure Syrians' right to adequate housing?
- To what extent does the programme contribute to Syrians' awareness and ability to access their rights?
- To what extent does the programme reduce Syrians' need to resort to negative coping mechanisms?

Additionally, the evaluation provides a response to NRC's annual evaluation question which is included in all evaluations. For this year, the question selected by NRC is 'Is NRC reaching the right people?'

Evaluation methodology and limitations

The evaluation adopted a mixed methods approach, with a combination of qualitative and quantitative measures. Qualitative measures included desk reviews of background research, project reports, key informant interviews, focus group discussions, visits to completed properties in Irbid, Jerash and Ajloun, observation of a 'move in day', and visits to the Irbid drop-in centre. Quantitative aspects involved review of project data, including housing unit completion rates, delayed construction periods, occupancy periods, moving out rates, etc.

The evaluation faced one significant limitation. At the time of the evaluation, the Government of Jordan had imposed, and then lifted, a suspension on the approval of all shelter programming. This affected all shelter actors working in Jordan, including NRC, who suspended signing new shelter contracts on 17th May 2015 and had not recommenced at the time of the evaluation. When the evaluation took place, one national NGO had negotiated the authorisation / reauthorisation of their programme, however NRC had not yet been issued with a formal approval for its Shelter / ICLA work. This created a challenging operational environment for NRC shelter and ICLA programme staff. Due to these sensitivities, it was possible to interview representatives of some but not all Government Ministries during the evaluation.

Key findings

- 1) The shelter / ICLA support provided by NRC is effective in providing Syrian refugees with a secure tenancy for an interim period of 12 – 18 months. The shelter meets or exceeds SPHERE standards, which are seen as the basic minimum international standard for shelter and includes an allocation of 3.5 sqm under cover per person. Beneficiaries have a legal right to the occupancy of the property through a signed lease which is registered with the local government municipality. This gives legal protection against lawful eviction, however in some few circumstances beneficiaries may still be subject to informal eviction pressure or harassment from landlords and / or neighbours. Follow up visits by ICLA staff aim to identify and resolve issues through collaborative dispute resolution, particularly focusing on landlord-tenant issues.
- 2) The programme has been effective in adding to the available rental housing stock in Irbid and Jerash communities, at a time when the Government of Jordan was concerned about the impact of large numbers of Syrian refugees on rental market prices. We consider the contribution of rental housing

stock through NRC's programme has helped to cool housing market pressures, particularly in identified rural areas where NRC has been active. However, it is not possible to determine the quantitative extent of this impact with any degree of specificity. Anecdotally, stakeholders reported that housing prices have declined more in rural areas, due to increased housing availability and lower demand, as people prefer to live in urban areas.

At the same time, the Government of Jordan has been exercising further border controls and restrictions on the arrival of Syrian refugees, and has taken steps to actively encourage Syrian refugees to return to camps. Both of these factors would reduce the boom in demand for rental accommodation and cooled housing prices. Notably, not all refugees would remain in camps, as some would return, typically to urban areas in search of employment and proximity to services.

While the evaluation can identify factors of NRC's programme which should have helped to cool housing prices, more detailed analysis (such as the Housing Demand Study undertaken by UN Habitat and National authorities) would provide a more empirical basis for the attribution of NRC's impact on housing prices.

3) ICLA has provided legal assistance services, including:

- a) Legal information – provide generic information on access to essential services (such as health, education and access to cash assistance), providing information to landlords and beneficiaries of their respective rights and obligations under the 'free of charge occupancy lease agreement', information on HLP issues.
- b) Legal counselling – to provide customised advice and direction to empower beneficiaries to act to address their situation – for example, on access to essential services, status and registration, and HLP issues.
- c) Legal cases – open a case to provide support in assisting a beneficiary to obtain their rights, for example, negotiating resolution of a dispute between a beneficiary and landlord using Collaborative Dispute Resolution, or support to register a marriage in order to protect inheritance and divorce rights.

ICLA has also provided complementary services – for example, providing a drop in centre in Irbid and a telephone hotline for enquiries, providing simple referrals, providing supported referrals, and conducting some training for INGOs. These services have been predominantly provided to shelter beneficiaries, particularly beneficiaries who have relocated (or are about to relocate) into rehabilitated NRC shelter properties. This combination of shelter and ICLA programming has enabled ICLA to have access to a pool of beneficiaries, and to provide a high level of service to those beneficiaries.

While the service levels provided to shelter beneficiaries have been high (high quality of services and high frequency of services through monthly or bi-monthly contacts) and the strategy is very reasonable, ICLA's focus has been predominantly on providing services to shelter beneficiaries, which is a limited group of the overall Syrians in need. This may not necessarily be the most efficient use of limited ICLA resources. There is the likelihood of unequal service provision (i.e., people who are benefiting from Shelter then receive further benefits from ICLA services). There is also a risk of low impact or potentially over-servicing beneficiaries – for example, if ICLA conducts a series of routine follow-up visits to a beneficiary who does not have a problem, these visits may still have value as an opportunity to maintain relationships and provide information, but these ICLA resources could likely be deployed to assist other beneficiaries with greater needs. There are globally relatively few legal assistance models where

paralegals routinely follow up to monitor situations, and those that exist tend to be where there are specific vulnerabilities – e.g. follow up on SGBV situations.

ICLA’s focus on working with shelter beneficiaries was a deliberate design decision, aimed at ensuring an integrated programme which provides comprehensive support and synergies across programme activities. However, due to this design approach, ICLA services are not implemented in Jordan to the full extent that they are in other countries. There is a relatively low number of local lawyers engaged (1 national lawyer, increasing to 2 after the evaluation fieldwork period). ICLA related training and outreach generally takes place in conjunction with other NRC programmes (such as shelter) or in partnership with other organisations (rather than directly).

The pool of shelter beneficiaries is relatively limited, since a substantial investment is required to assist each family to relocate. This means that ICLA has focused assistance predominantly on a needy, but relatively narrow subset of Syrian refugees. In an ideal situation ICLA would be providing a greater range of services to a broader range of beneficiaries – for example, an expanded range of legal assistance services on HLP and CLD issues, and working with a broader group of beneficiaries – i.e. deliberately targeting non-shelter beneficiaries for service delivery. We note that the operating environment is not necessarily conducive to ICLA providing an expanded range of services, although the JRP may present new programming windows, and ICLA would have more operational space if it did hold a MOPIC endorsement. Subject to dialogue with the GoJ and donors to address sensitive issues of concern, it would be useful to expand both the range of ICLA beneficiaries (to include non-shelter beneficiaries) and also the range of ICLA services provided (to increase focus on more technical areas of ICLA’s global work, including HLP (particularly, registration and civil legal documentation issues).

- 4) The programme has adapted since its commencement, and has commendably identified and sought to address programmatic issues – for example, in making programme adjustments to identify reasons for beneficiaries rejecting proposed accommodation and making programmatic changes which have led to an increase in the acceptance rates of the matching process (e.g. reducing movements across districts, greater attention to beneficiaries with disabilities and special needs who may have particular accommodation requirements like no stairs, etc.).
- 5) Housing rental is the largest household expense for Syrian refugees in Jordan. Removing this expense reduces some financial pressure for families and allows families to allocate their available funds towards other expenses, including food, utilities and medical expenses. However, the families placed in NRC accommodation have continued to run down their savings, albeit at a reportedly slower rate than if they were also paying market rent. Focus group beneficiaries said they were unable to save money during their tenancy due to ongoing expenses, limited or no legal work opportunities and reductions in the level of assistance provided by other donors such as WFP food vouchers. NRC’s contribution is a significant factor in assisting households, however it remains a partial solution due to households other financial needs remaining unsatisfied.
- 6) For the Shelter Programme, the combined shelter / ICLA approach has had both advantages and disadvantages.
 - a) Advantages - the Shelter programme has benefited from the staff resources of the ICLA team performing the routine beneficiary follow up work. The Shelter programme has also benefited from the ICLA team’s expertise on HLP issues, and their specialist expertise in the areas of collaborative dispute resolution, etc.

- b) Disadvantages – The linear work process using a “production line” approach versus the ICLA approach of case management results in some items are being missed. For example some shelter technical issues arising through the routine beneficiary follow-up are not systematically directed back to the shelter team and being dealt with accordingly.
- 7) The relocation of beneficiaries from one area to another area has the potential to raise substantial protection concerns if this is not well managed. Some focus group participants who left their property early reported that their property was unsuitable since it was too far away from services – from transport, shops, medical assistance, schools, informal work opportunities etc. School aged children may be unable to re-enrol in a new school district, particularly for families who have not yet gone through the MOI re-verification process. School transfers may also be more difficult during the school term. Other focus group participants noted the prevalence of police checkpoints on roads leading to their new area, which isolated them in their houses to avoid the risk of police detention and fines, return to or refolement to Syria. Other focus group participants noted higher utility expenses at the new property – higher electricity expenses to heat or cool a less efficient home, higher water expenses and septic tank sewage pump out expenses for houses not connected to the main water network etc. The programme has made efforts to improve the housing selection process and matching process, with the Beneficiary Acceptance Rate reportedly improving from 54% to 90% between May and December 2014. However, this process inherently requires fine attention to detail, which is challenging to manage as the programme scales up.
- 8) Focus group participants advised that the living situation for Syrian refugees is becoming increasingly more difficult as the crisis extends. These factors are expanded on within the report, however notable issues include:
- a) Repeated displacement of families during their stay in Jordan.
 - b) Limited or no access to legal work opportunities.
 - c) Risks of fines, detention, return to camps or refolement to Syria for refugees with irregular documentation, working illegally or considered to be security risks.
 - d) Challenges for refugees to meet the requirements of the current MOI re-verification process, including challenges obtaining documents and paying for health certificate fees.
 - e) Reduced access to Government of Jordan support for medical expenses.
 - f) Reduction in available assistance from the international community, as available funding has declined.

These issues place additional demands on NRC’s shelter and ICLA services. It is challenging for NRC to meet these growing needs, particularly when the predominant shelter response has been rehabilitation of unfinished building, which requires a significant investment per property.

- 9) NRC has introduced a new Shelter repair modality in 2015, although at the time of the evaluation this was still in a pilot phase, due to factors including low numbers of houses that were considered

suitable, where the landlords and beneficiaries were also willing for the work to take place. At the same time, the GoJ's suspension of the approval of all shelter sector operations also limited the implementation of this new modality. Consideration should also be given to the current repair eligibility criteria and whether the current process is 'too intensive'. Based on an undated internal NRC analysis,¹ we understand that from visits to 953 registered beneficiaries, 139 ICLA and technical assessments were conducted, 102 families were willing to participate, 48 properties were technically suitable and 12 contracts were issued.

- 10) The Jordan Response Plan requires aims to foster the resilience of service delivery systems at national and local levels (i.e., health, education, water and sanitation), to meet the immediate needs of Syrian refugees on and off camps, meet the immediate needs of vulnerable Jordanians affected by the Syria crisis, and rapidly expand employment and livelihood opportunities and strengthen the coping mechanisms of the most vulnerable groups in the Jordanian population affected by the crisis.² Projects primarily targeting refugees may be required to provide 30% of additional support to Jordanians as a result of a required 70% to 30% distribution.³ The Shelter programme does benefit individual Jordanian landlords through providing financial support to complete housing. However, over time it appears that the programme has shifted to a series of many individual engagements with landlords, rather than higher level engagement with host communities. Some ICLA services may be suitable for both Syrian refugees and host communities – for example, tenancy assistance could be offered to poor Jordanian tenants in addition to poor Syrian tenants, collaborative dispute resolution could be broadened to support community dialogue and disputes between tenants and neighbours, rather than focusing predominantly on landlord – tenant relationships.

Key recommendations

1. Expand the range of shelter programme options. The main shelter response provided by NRC has involved relocating beneficiaries to a newly completed accommodation. This approach has the advantage of contributing to additional housing stock and dampening inflationary rental market pressures, and ensuring that the shelter is built to a minimum SPHERE standard. However, this approach is relatively costly⁴. The approach may also be unsuitable for some beneficiaries (e.g. small families), or unnecessary for other beneficiaries (e.g. beneficiaries whose current rental accommodation may require only a small amount of work to remedy defects). NRC has recently introduced a Renovation programme to repair and up-grade sub-standard housing units and remedy defects in return for a rental reduction or rent free period. However, this programme is still new and has not yet reached an effective mass, possibly due to government halt on all shelter programmes, and other potential factors relating to selection and eligibility criteria. To respond to the various shelter/ICLA needs, other programme options could also be explored, including cash programming, construction of core houses for smaller householders, referral to neighbour skill exchanges operated by other NGOs, etc.

¹ Page 6, NRC Urban Shelter, Cash for Rehabilitation (undated)

² Page 3, JRP 2016-2018 Guiding Framework

³ E.g. JRP refugee and resilience categorisation guide

⁴ Refer to page 41 for cost analysis breakdown

2. Expand the range of ICLA target beneficiaries. We appreciate that external factors have constrained ICLA's beneficiary focus, and that there has also been a deliberate emphasis to focus on shelter beneficiaries to provide an integrated programme. We also understand that lessons learned from Lebanon recommended a closer connection between the programmes, and the NRC Jordan programme has been set up in such a way to implement this recommendation. We believe this relatively narrow beneficiary focus omits many potentially vulnerable beneficiaries who could benefit from ICLA's assistance, and we consider that there is probably a reasonable middle group between ICLA being 'embedded' within a shelter programme to the extent that ICLA programming is hindered and ICLA being completely isolated from the shelter programme. Such an expansion could be implemented in a phased way – for example, ICLA could commence by providing more assistance to beneficiaries on the shelter waiting list (for example, support lease documentation and registration to provide interim security of tenure to beneficiaries on the shelter waiting list), work more closely with CBOs to develop their capacity to address and advocate on HLP issues, and expand referral collaborations with legal aid organisations providing assistance and representation. Subject to obtaining MOPIC approvals, ICLA could also further strengthen its own role, including greater internal legal case management and paralegal supervision capacities.

3. Expand the range of ICLA services – NRC Jordan does not currently make the best use of NRC's global expertise in ICLA issues, including HLP and Civil Legal Documentation. We also note that there is significant demand for these services in Jordan, as shown through the consultations of the present evaluation and other research studies. The present focus on providing services to shelter beneficiaries has led to focusing primarily on ICLA services which are directly relevant to this group – e.g. information on access to essential services, information and support with MOI Service card re-registration in a new location, and collaborative dispute resolution, specifically focusing on landlord – beneficiary relationships. While not wishing to minimise the importance of these activities, especially for the targeted shelter beneficiaries, this does minimise the scope for the expansion of services which ICLA would generally provide in other countries – a greater emphasis on HLP and CLD issues, a greater emphasis on training of community representatives and duty bearers in HLP and CDR issues, and a better resourced legal function and case work role.

4. We would recommend that the shelter field staff should have a responsibility in carrying out the beneficiary follow-up for feedback purposes and should be joined by an ICLA staff to provide ICLA services. Where there are specific issues, the shelter field staff should request for technical support from the different programmes – i.e. whether the engineering team support is required to address a property defect, or the ICLA team is needed to provide specialise collaborative dispute resolution or lease re-negotiation support. This would ensure that technical concerns, shelter or ICLA related, which arise during the feedback and follow-up period to be addressed.

Additionally, to ensure that defects and shelter issues are addressed in a professional manner, we would recommend that the contract with the landlord includes the following:

- Standard contract template between landlord and contractor (including general contract conditions, specifications for quality of works, workmanship, materials, and minim standards,

and defect liability period⁵ e.g. for up to 6 months with a 10% retention for the contractor to remedy defects following the completion of the works)

- Guidance on how this contract should be administered, and how the defect and liability period should be managed.

- A joint PDM should be undertaken by NRC shelter technical staff and the landlord to ensure defects are being remedied, ensuring that the landlord is following-up on his responsibility to follow-up the defect claims with the contractor.

5. We note that some of the beneficiary follow up work currently undertaken by the ICLA team is relatively routine in nature and does not require the exercise of special skills and expertise which the ICLA team members have developed. We believe the greater involvement of the Shelter team in beneficiary follow up would encourage the Shelter team to engage more comprehensively with beneficiaries and promote a greater beneficiary focused approach (rather than shelter / site orientated approach). We also consider that the greater involvement by Shelter in routine follow up would allow ICLA staff to provide a more targeted and specialised assistance in circumstances where that assistance is warranted, and also free up staffing resources to eventually broaden the range of services provided to a larger range of stakeholders.

We note that there are potential sensitivities relating to an expanded ICLA role. We suggest that the ICLA programme proceed quite deliberately and strategically in any expansion of their role:

- Seeking to obtain Government endorsement, perhaps in coordination with other legal aid partners and engaging in a stronger dialogue with the Ministry of Justice.
- Identifying some comparatively easy entry points which build upon ICLA's expertise and the relationships already established with Government and NGO networks – for example, the promotion of birth registration (e.g. through providing outreach and promotional information at pre-natal and ante-natal clinics, potential collaboration with NGOs to include birth registration information inserted into new birth kits provide by NGOs), providing tenancy information and assistance to host communities in addition to Syrian refugees to build community resilience in line with the Government's priorities, etc.
- Expanding in-house capacity to correctly manage casework. At the time of the evaluation fieldwork, NRC was recruiting for a second lawyer. Additional national lawyers and experienced paralegals would be required to manage an expanded casework role – one additional lawyer is not adequate. Failure to recruit additional national senior / supervisory staff risks staff burnout, and an excessive caseload prevents junior staff from receiving the direction and support they require to professionally develop and perform their role properly.
- Continued collaboration with national legal aid partners – there are some cases which would be less sensitive if handled by a national partner – for example,

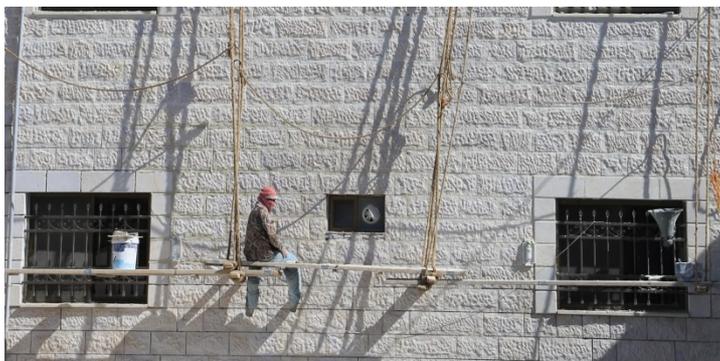
⁵ Defects do not include normal tear and wear.

attending a police station with a beneficiary who has irregular papers. NRC should ensure that their national partners are equipped to manage these sensitivities, and that NRC is not unreasonably transferring risks to national partners.

- Expanding NRC Jordan's understanding of HLP and civil and legal documentation issues in Syria, so as to improve the context and quality of information which is provided to refugees, but also to attempt to preserve refugees rights and opportunities to return in the future. NRC Jordan's participation in regional studies is a useful example of this approach.
6. Consider adopting a more area-based approach to programming. This has potential to encourage greater collaboration between NRC's programmes across core competencies, and to improve NRC's stakeholder engagement with local authorities and community leaders. It is also a pragmatic reflection that in some locations, NRC is working at a high enough volume to have an impact on communities, but NRC's approach and engagement is structured instead as a series of individual landlord-tenant relationships. There could likely be efficiency gains from providing information on access to basic services at a community level, rather than to each individual beneficiary, and then sensitising beneficiaries to approach community information points (e.g. in community centres, or local community representatives) to obtain further information if required. The current approach provides high volumes of information assistance to shelter beneficiaries, but some of this support could likely be more effectively channelled into other activities.
 7. Strengthened engagement with local actors – including local municipalities, local leaders, religious leaders and other key stakeholders. Regardless of whether NRC shifts to area based programming, deliberate efforts should be made to strengthen strategic engagement with important stakeholders at local levels. The Country Office and programmes have extremely successful national level engagement with Government Ministries, Government processes (such as the JRP), donors, and other actors (e.g. through the co-chair role of the Shelter Working Group). However, the municipality and stakeholder links at local levels appear to have reduced.. We appreciate that there are also ongoing internal discussions between Central ministries and local municipalities, which may constrain NRC's engagement and municipalities' decision making powers. However, stakeholders at local municipalities and civil society have requested greater engagement with NRC (e.g. consultation on the selection of areas to rehabilitate, joint promotion of NRC activities through town hall meetings, and the offer of municipality premises to host a drop-in centre). It appears that there is not a specific representative in the Irbid office who has the authority to holistically represent NRC to local actors (as opposed to several managers who can represent their own programmes to local actors).
 8. To reduce the potential negative effects, the programme might have on the rental market, with the increased cost of the rental properties, NRC should communicate more comprehensively the programme to landlords, tenants, authorities and other stakeholders involved. Some of the FGDs highlighted that landlord and tenants perceived the cash provided by NRC as the total amount of the rent-free period. It was not always understood that it also contributed to the construction and repair of the property so that it would meet the agreed standard of adequacy for a free-rent period. As a result, some landlords were using this argument to double and

sometime triple the expected rent once the free-rent period was completed, explaining that this amount is based on the cash provided by NRC for the rent-free period. When identifying landlords for the programme, an estimated rental amount could be discussed before beneficiaries are allowed to move in, whilst allowing for negotiation and discussions once the rent-free period is completed. ICLA could potentially play a greater role in the end of lease arrangements – e.g. assisting in ‘reality checking’ that NRC will not continue the lease, encouraging beneficiaries to search for new accommodation, reminding beneficiaries they will be responsible for damage and final utility bills, etc.

Context



The Syrian conflict, now in its fourth year, has resulted in large-scale displacement both within Syria and across the region. The latest estimates put the number of internally displaced with Syria at 6.5 million and the number of registered refugees across the region at more than 3 million. Jordan hosts more than 632,000⁶ registered Syrian refugees, the equivalent of some 10 per cent of its population. Over half a million Syrian refugees (518,000) in Jordan live in host communities spread throughout Jordan (approximately 82 per cent of the total refugee population). The Jordanian Government estimates that the total number of Syrian refugees in Jordan (including unregistered refugees) could reach up to 1,200,000 people. Approximately 55% of refugees are estimated to be aged less than 18 years.⁷

Syrian refugees are facing prolonged, and often multiple, displacement, struggling to survive in poverty pockets of northern Jordan where access to basic services was already overstretched. Schools and hospitals are running beyond capacity, competition for jobs has driven wages down, and prices for food, fuel and rental accommodation have increased significantly. The resilience of Syrian refugee households and Jordanian communities is declining causing increased tension within communities. A 2014 assessment⁸ indicated actual or fear of rising rental prices and competition to secure housing as the two main areas of tension between refugees and host communities in Jordan. Some housing pressure has been temporarily alleviated due to the restrictions affecting the movement of Syrian refugees across the border to Jordan. However, this pressure would resume should the restrictions be removed.

Based on VAF modelling, WFP estimates 200,000 extremely vulnerable Syrians living in host communities are below the abject national poverty line of 28 JDs per month. According to UNHCR female-headed households face particular protection concerns, including security of tenure. Many are living in rudimentary shelters or tents, abandoned or partially constructed buildings, or in often overcrowded and poorly maintained flats. They struggle to access basic services such as health and education, often because they lack identity documents and/or even limited legal status, and are prohibited from seeking legal employment. According to a recent joint report on the mental health and psychological needs of Syrian refugees, approximately one in five Syrian refugees finds it difficult or

⁶ <http://data.unhcr.org/syrianrefugees/country.php?id=107> as at November 2015

⁷ Shelter Macro Logframe

⁸ REACH, Evaluating the Effect of the Syrian Refugee Crisis on Stability and Resilience in Jordanian Host Communities; Preliminary Impact Assessment (January 2014)

unable to carry out essential activities for daily living because of feelings of fear, fatigue, distress and hopelessness. With very limited legal access to livelihoods, they rely on the Government of Jordan (GoJ) and its humanitarian partners to meet their basic protection and assistance needs.

The operating environment remains quite complex and sensitive. At the time of the evaluation, the Government of Jordan had just lifted a suspension of activities for all organisations conducting shelter programming. One national organisation had managed to obtain approval to carry out shelter programming, while NRC was still waiting for their approval to be issued. As the programme was designed to have integrated shelter / ICLA activities, NRC had not applied for separate authorisation of ICLA activities beyond those which were shelter related. The focus on integrated shelter / ICLA activities leads to strong synergies between the two programme areas, but it also means that NRC Jordan is not implementing ICLA activities as comprehensively or prominently as it is in other countries.

The Government of Jordan has increasingly adopted measures to ensure that aid is delivered according to its priorities. The Jordan Response Plan is a policy document aimed at building consensus between the Government and donors on priority assistance required. The Government remains concerned to ensure that host communities are appropriately supported, and there is increased emphasis on resilience programming which benefits host communities. The Government also appears sensitive to initiatives which may encourage refugees to settle in Jordan long-term, and remains concerned by the security implications of accepting some refugees. Donors and the international community have had relatively little capacity to influence the Government's position on some of these issues.

The living situation for Syrian refugees is becoming increasingly more difficult as the crisis extends.

- a) Most focus group participants had been repeatedly displaced during their stay in Jordan, with each displacement incurring further expenses for moving, establishing utilities etc. Respondents had frequently been displaced every 6 – 12 months. MOI Service cards are reportedly only valid for the district where they are issued. When people relocate across districts, they are officially required to re-register to access Government services in the new area, including health services and education. People without current registrations are likely to be more vulnerable to arrest and detention, and may also need to purchase medicines through more expensive private pharmacies rather than from Government clinics.
- b) Syrian refugees have limited or no access to legal work opportunities. Focus Group participants and stakeholders reported that the Government of Jordan has increased enforcement of these rules through police raids on worksites and increased roadside checkpoints, resulting in fines, detention, risk of return to camp for those without proper 'bail-out' cards, and risk of refoulement to Syria for refugees considered to be a security risk.

The Government of Jordan is currently conducting an urban Syrian refugee re-verification exercise to ascertain the number and identity of Syrian refugees. This has imposed additional pressures on Syrian refugee families. Some refugees do not have their original documents as they had previously submitted to them to Ministry of Interior and they have not been returned. Some landlords are unwilling to register their leases with the municipality (as required so the refugee can show their legal place of residence) as they are then liable to pay Government stamp duty on the lease. Some refugees have fraudulent

documents (leases, bail-outs, MOI registration cards etc.), which would not pass a thorough verification check. Many refugees are unable to afford the cost of a health certificate which must be obtained for each MOI card applicant aged over 12 years old.

The verification exercise is aimed at allowing refugees who left the camps outside the bailout system and who have an ASC to regularise their status and receive a new MoI Service Card. Syrian identity documents retained prior to December 2013 are also now being returned as part of the UVE process. At the time of the evaluation data collection, efforts were underway to locate and return Syrian identity documents which had been surrendered to the Jordanian authorities.

Regardless of whether they are registered with UNHCR or not, all Syrian nationals in host communities in Jordan are required to present themselves to local police stations to obtain a new biometric MoI Service Card and confirm their place of residence. To receive the new MoI Service Cards, all Syrians above 12 years of age must pay for and obtain a health certificate from the Ministry of Health which they must take to their nearest police station, along with a stamped lease agreement and copy of their landlord's identity document. As part of the verification exercise, Jordanian authorities, with UNHCR's assistance, also undertook to return retained documents. The verification exercise should also allow refugees who left the camps outside the bailout system and who have an ASC to regularise their status and receive a new MoI Service Card. In October 2015 Jordanian authorities announced important changes to the parameters for Syrian refugees: (1) the cost of obtaining a MoH health certificate (a requirement for all Syrians above the age of 12 years) was reduced from JOD 30 to 5; and (2) Syrian refugees are able to prove their place of residence through two additional mechanisms (the landlord accompanying the Syrian tenant to the police station to testify to their address or obtaining a document from UNHCR indicating their address as listed in the UNHCR database).

- c) The Government of Jordan has changed the eligibility for medical assistance, and Syrian refugees are no longer entitled to access medical services at subsidised Jordanian national rates, but must pay for medical treatment. Emergency medical expenses can be extremely high, especially taking into account the costs of unforeseen medical expenses such as a birth by emergency caesarean section when a much cheaper natural birth had been planned.
- d) Reduction in available assistance from the international community – as the available funds have decreased, the international community have reduced their programmes. In particular, many refugees relied on WFP food vouchers as both a source of food and income from informal trade. Other organisations previously providing cash for rent assistance have reportedly reduced or limited the scope of their programming (e.g. by limiting cash distributions to existing clients, restricting cash distributions to once per year per client etc.). Additionally the fact that WFP has suffered from severe funding cuts has significantly affected the adequate access to housing. WFP was providing food vouchers, and many beneficiaries explained during focus groups that they sold these vouchers to pay for their expenses such as utility bills. The lack of income or food vouchers is limiting families possibility to pay their bills and therefore access safe and adequate housing.

We understand that following the data collection period of this evaluation, WFP revised its allowances to provide additional assistance to refugees in host communities as follows:

- (1) 230,000 individuals classified as 'vulnerable' will receive 10 JOD per person per month until January 2016. Those who fall within this category did not receive any food assistance since August 2015 due to lack of funds.
- (2) 212,000 individuals classified as 'extremely vulnerable' will receive 15 JOD per person per month until January 2016. Those who fall within this category received reduced food assistance (10JOD/person/month) since August 2015.

Evaluation findings



Lines of enquiry

The detailed evaluation findings are outlined in response to the evaluation questions selected by NRC. However, the evaluation Terms of Reference also lists three lines of enquiry and an additional annual global evaluation question. These lines of enquiry are addressed in summary here.

1. To what extent does the programme ensure Syrians' right to adequate housing?

The programme provides a high level of shelter support for selected beneficiaries, for a finite period of time. 93% of beneficiaries reportedly felt 'secure' or 'very secure' in their new accommodation, compared to only 58% before.⁹

The support is high investment and high impact, in that the main shelter option is relocation of beneficiaries to a recently completed property for a 12-18 month rent free period. The relatively high cost of this option¹⁰, the limited amount of suitable housing stock¹¹, and the exceptionally high numbers of Syrian refugees in need of shelter assistance mean that this approach by itself is difficult to scale up to meet the extensive needs.

The main advantages to beneficiaries of NRC's assistance have accrued during the lease-free period. Following the expiration of the NRC free of charge occupancy agreement, few beneficiaries had the financial capacity to enter into a new lease at commercial rates¹², and to meet the ongoing expenses associated with a house (utilities etc.). NRC's internal analysis suggests that 18% of beneficiaries could stay in their properties at the conclusion of the lease period. Some of these beneficiaries were able to remain in their property because NRC negotiated access to additional assistance under other

⁹ NRC - DFID Value for Money report, March 2015

¹⁰ ¹⁰ Refer to page 41 for cost analysis breakdown

¹¹ NRC Shelter Staff shared the challenge they have been facing in finding housing units which would fit the need of the pre-identified beneficiaries. One of the concerns was that the housing market in Irbid, Jerash and Ajloun did not offer enough apartments with 1 or 2 housing units which would be suitable for smaller households. Most apartments on the market have 3 to 5 housing units. NRC reported that Shelter housing stock includes 1% 1 HU properties and 21% 2 HU properties – 'NRC New Funding Table 27 July 2015'.

¹² Depending on the number of housing unit the rate varies between an average of 113 JD – 221 JD

programmes. There was also a risk raised during the focus groups that at least some of those beneficiaries who remained in NRC properties had insufficient financial capacity to pay for both the lease and basic living expenses, such as utilities and winter heating. The limited access to legal livelihood opportunities and the reduction in available donor support has severely constrained beneficiary households from living independently at the conclusion of the NRC free of charge occupancy agreement. We understand that NRC has conducted some follow-up study of beneficiaries who remained in their shelter property after the conclusion of the lease period. This study confirmed that 79% of beneficiaries who remained in their properties understood their rights on security of tenure and adequate housing due to NRC's assistance, and were currently benefiting from a formal written lease. We note that the situation of the beneficiary post-assistance is of significant importance for the programme, and we encourage continued monitoring and investigation on this issue.

We recommend that a range of complementary shelter options should be developed and implemented. The new 'repair' option to exist beneficiaries to remain in place should be expanded, with some adjustments in scope of works and level of financial eligibility to increase the uptake of the programme. Other complementary shelter options, such as winterisation, collaboration with WASH programming and cash programming should also be explored. These programmes may be more suitable for the needs of the most vulnerable beneficiaries, who do not have the financial resources required to relocate into a new house and pay ongoing monthly housing expenses.

NRC's initial theory of change was innovative, in that it deliberately sought to increase the available short and medium stock by advancing landlord's investment decisions to complete property construction. This approach has led to additional housing stock entering the market several years ahead of schedule, and in some cases, landlords stated during the evaluation that without NRC's help they would never have completed the property. This additional housing stock has anecdotally had a cooling effect on rental prices, by increasing supply. However, there have been other complicating factors (such as the effective closure of the Jordan / Syrian border) which have similarly had a cooling effect on rental prices. Without a detailed empirical housing market survey, it is difficult to meaningfully attribute the extent to which NRC's programme has helped avoid housing market inflation. However, anecdotally there has been some contribution.

Notably, some respondents also advised that the programme had led landlords to increase their rental expectations for post-NRC tenants, as they divided the amount of the assistance provided by NRC by the lease period, and used this to generate their desired new rent price. However, tenants have not had the capacity to pay these inflated prices, so anecdotally these rental expectations have been frustrated.

Without funding for NRC's project, the response would be limited to a relatively small-scale cash-for-rent and shelter renovation interventions, which, while an essential part of a humanitarian response, fails to address to root cause of the shelter problem - the shortage of adequate housing stock. Without addressing the root of the problem, vulnerable refugees will be forced to reside in sub-standard and / or overcrowded shelters at inflated rents, at risk of eviction and facing a range of protection concerns.

2. To what extent does the programme contribute to Syrian refugees’ awareness and ability to access their rights?

The programme provides an exceptionally high level of service to a relatively small beneficiary group. In addition to general legal information sessions and targeted events such as group information sessions and training on civil documentation (with a specific focus on birth registration), the predominant focus has been on providing tenancy assistance, landlord – tenant collaborative dispute resolution and information on access to services and legal counselling and legal assistance on Legal and civil documentation to shelter beneficiaries, through regular in person visits, specialized legal counselling with ICLA lawyers and/or phone contacts and referral.

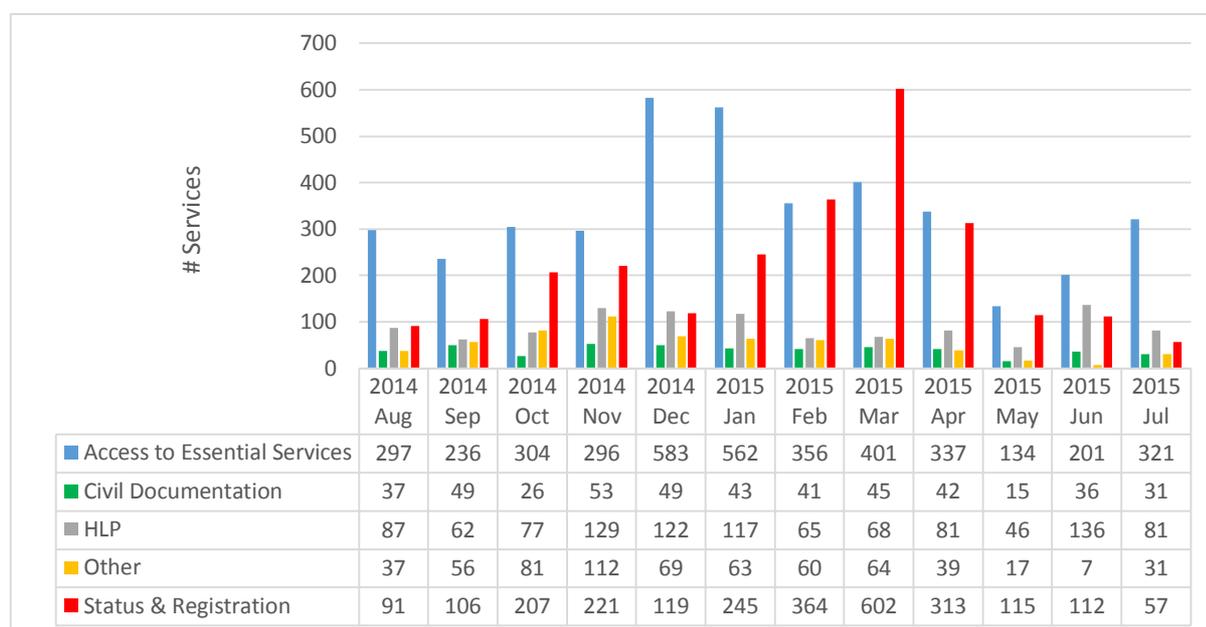


Table of ICLA services: Predominantly access to essential services and Status / Registration cases

It is useful to consider some of the various rights which NRC and ICLA are seeking to target through this programme:

Right	Programme response
Housing, Land and Property	
Right to adequate housing – right to live in security, peace and dignity ¹³ <ul style="list-style-type: none"> Protection against forced evictions 	<p>ICLA provides extensive support through information on rights and responsibilities and also CDR to resolve landlord-beneficiary issues. These approaches aim to avert conflicts reaching the point of eviction.</p> <p>In relatively few cases where the relationship has broken down irretrievably, NRC has worked to relocate the beneficiary to a</p>

¹³ See also the discussion on Shelter Adequacy on page 54

Right	Programme response
<ul style="list-style-type: none"> The right to be free from arbitrary interference with one's home, privacy and family 	<p>new property.</p> <p>NRC provides support through landlord / beneficiary information and CDR which addresses the majority of landlord – beneficiary issues. However, ICLA has had limited focus on addressing neighbourhood issues which interfere with the use of property e.g. privacy issues, competing uses of roofs and balconies, harassment and stone throwing.</p> <p>These issues require a range of additional options – community involvement, police involvement, etc.</p>
<ul style="list-style-type: none"> The right to choose one's residence, to determine where to live and to freedom of movement. 	<p>NRC provides an option for a selected beneficiary to relocate to a new property. This option does not always appear to be presented to the beneficiary in a way which empowers them to choose freely where to live.</p> <p>The freedom of movement of many Syrian refugees is currently constrained by fear of arrest and fear of contact with GoJ authorities. This is in part due to issues of the MOI re-registration process.</p> <p>ICLA is providing some information and assistance on this issue, predominantly to shelter beneficiaries who have just relocated to a new property, and are given information and encouraged to re-register with the MOI in their new location. Beneficiaries with specific needs may receive further assistance or a referral to another service provider (e.g. a local legal aid service provider who can accompany them to the police station to re-register).</p> <p>ICLA could provide more direct services in this area, subject to MOPIC approvals. ICLA could also make better use of the data it has collected on this issue, to analyse case records and provide a solid empirical basis for advocacy by the international community.</p>
<ul style="list-style-type: none"> Entitlement to Security of tenure; 	<p>ICLA's work promotes security of tenure for shelter beneficiaries for the period of the lease agreement. The model lease has been 'improved' to grant stronger rights to tenants – for example, by improving provisions on pre-existing damage.</p> <p>ICLA could encourage greater adoption of this lease by other actors, We understand that the model lease has been shared with the PWG, but other stakeholders such as the Jordanian Bar Association may also prove useful allies.</p>

Right	Programme response
	Beyond the pool of shelter beneficiaries, there is scope for ICLA to focus more on improving the security of tenure for other Syrian refugees – for example, those on the shelter waiting list without a lease in their current property.
<ul style="list-style-type: none"> Equal and non-discriminatory access to adequate housing; 	The NRC initiative promotes dignity by supporting people to move from overcrowded and unsanitary houses and informal settlements, and to relocate to a property which exceeds SPHERE standards and is generally consistent with Jordanian private rental standards.
<ul style="list-style-type: none"> Participation in housing-related decision-making at the national and community levels. 	NRC is the co-chair of the Shelter Working Group, and active in working through donor and NGO consortia to provide a sound and well researched evidence base for shelter and ICLA advocacy initiatives. In particular, evaluation respondents complimented NRC's advocacy work, and noting that the approach was empirical, rather than anecdotal, which gave greater credibility to the sector overall.
Land and Property rights	<p>A significant focus of the programme has been on Housing rights, rather than land and property rights. The programme has not sought to focus systematically on issues such as inheritance, or strengthening security of tenure of people living in informal settlements. These people may be more vulnerable than those who are being placed into rehabilitated properties, however NRC's primary focus has been on providing shelter to vulnerable people, rather than to the most vulnerable people.</p> <p>This approach is also logical from a shelter perspective, as the most vulnerable people are unlikely to be able to afford the ongoing costs of living in the property such as utilities. However, from an ICLA perspective, there is more work which could be done to build upon the research already undertaken and develop strategies to better address the non-shelter HLP needs of Syrian refugees – including early and forced marriage, inheritance, divorce etc. HLP rights are key for women in avoiding financial dependency, with the associated risks of vulnerability to exploitation and violence that this entails.</p>
Civil legal documentation	
Right to be registered at birth (e.g. CRC Art 7)	Birth registration is essential for many reasons – to provide proof of legal identity, to assist in accessing Government and donor services such as education and health, to prevent statelessness and preserve right of return to Syria, to provide proof of date of birth to prevent early marriage, to show family relationships and support family resettlement in a third country or family

Right	Programme response
	<p>reunification, to help combat human trafficking by trafficking legally invisible people, etc.</p> <p>ICLA has provided some assistance in this area, primarily through providing information on the process and requirements to shelter beneficiaries. ICLA has partnered with MSF to conduct one outreach session for MSF staff on birth registration, and has provided some case support and referral to legal aid service providers to assist other beneficiaries whose situations were complicated, e.g. due to the absence of a marriage certificate.</p> <p>ICLA could expand its work in this area in several ways: by continuing to partner with other actors who are involved in birth preparation and post-natal care (such as health partners), by intentionally seeking beneficiaries who are likely to face complications in birth registration, and by improving its own internal capacity to handle these case issues.</p>
Marriage registration	<p>Many Syrians do not possess marriage certificates, which are required for other purposes – e.g. birth registrations, preservation of family and personal status rights in the event of divorce or death, etc. Syrians may not possess these documents for several reasons – they may have been married informally (a ‘sheikh marriage’) in Syria, their ‘family book’ may have been confiscated by Jordanian authorities upon arrival in Jordan, or they may have married early and be unable to register their marriage.</p> <p>ICLA has provided some legal information and counselling in this area, and referral for representation to other organisations. Given that this issue has important implications for both birth registration and women’s HLP rights, there would be scope for ICLA to expand their work in this area. In particular, it would be important to be prepared for GoJ amnesties on registering informal marriages that took place in Syria, where the normal fine of 1,000 JDs is waived.</p>
Death registration	<p>Registration of deaths is required to access inheritance rights, and also to enable people to re-marry. The latter point disproportionately affects women, since a male can have up to four wives he is not required to prove that his first wife has died before he takes a second wife.</p> <p>Registration of deaths was not raised as a significant issue during this evaluation. However, this may be an issue for NRC to</p>

Right	Programme response
	continue to monitor.
Registration	<p>UNHCR estimated in 2014 that 99.2% of Syrian refugee households outside the camp had a registered Asylum Seekers Card, and 95.4% of Syrian refugees had a MOI Service Card.¹⁴ These cards are required for refugees to have freedom of movement, and to access Government services including schools and health care.</p> <p>In July 2014, the GoJ directed UNHCR to cease registering new Asylum Seekers Cards for people who left the camps outside of the formal bail out process. Some estimates are that 45% of people left the camps outside the formal bail out process. Many other refugees have frequently relocated, and the MOI Service Cards must be re-registered to each new address.</p> <p>Refugees have faced a number of barriers with the MOI Service card renewal process, including: fear of arrest, detention and return to camp or deportation when approaching the GoJ and especially the police, the cost of the medical certificate (now reduced), lack of return of identity documents confiscated from some refugees, people who left the camps outside the formal bail out process or with irregular bail outs (e.g. their sponsor was not a relative or does not live in the same district them) etc.</p> <p>NRC has sought to provide legal information and counselling on the MOI service card renewal process, and specifically targeted beneficiaries who have relocated to a new property under the shelter programme. NRC has referred beneficiaries to external legal aid organisations for assistance with complicated re-registrations. These providers have had mixed approaches – some providers will accompany beneficiaries to the police stations if required to deal with difficult cases, while at least one provider appears reluctant to become involved in MOI cases where their clients may have fraudulently obtained documents.</p> <p>The information and advice provided by NRC on this issue is valuable. NRC has also established an array of data on MOI Service Card renewal, which would form an extremely useful empirical basis for advocacy. NRC lacks the internal resources to analyse and collate this data in a timely manner, and some further strengthening of capacity would be useful. As an</p>

¹⁴ Page 24, Living in the Shadows – Jordan Home Visit Report UNHCR (2014)

Right	Programme response
	international INGO, it would ultimately be difficult for NRC to become closely involved in casework on this issue, and depending on the sensitivities, significant challenges may be best referred to national organisations and UNHCR.

Under the Jordan Response Plan, it seems there are strategic opportunities for the ICLA programme to be more closely aligned with the Government's priorities expressed in the Justice and Protection sectors. This could create opportunities for the ICLA programme to 'de-couple' from the shelter programme and expand a targeted pool of beneficiaries, with a broader range of services. There are very positive elements of ICLA's work which would benefit from delivery to a wider range of beneficiaries. In particular, ICLA's collaborative dispute resolution approach could work in partnership with community stakeholders to help address beneficiary conflicts in neighbourhoods (including privacy issues, and quiet enjoyment of property). These are a significant issue for some beneficiaries, but beyond the role of the current programme implementation.

An expanded range of ICLA services would also require additional legal capacity. While some of this capacity could be obtained by scaling up existing cooperation with legal assistance partners, there remains the need for ICLA to significantly increase its national legal capacity, through additional qualified legal supervisors as well as some additional national staff with paralegal and casework experience.

3. To what extent does the programme reduce Syrians' need to resort to negative coping mechanisms?

The programme reduces the need for Syrian refugees who receive assistance (predominantly shelter relocation assistance) to resort to negative coping mechanisms for the duration of the assistance. However, due largely to external factors such as the limited legal work opportunities and reductions in other sources of assistance such as WFP food vouchers, this reduction in negative coping mechanisms is a temporary phase.

While the rent-free period is extremely valuable for families and saves them from paying their highest household expense, at the conclusion of the rent-free period, beneficiaries have generally not developed the capacity to sustain themselves. The relatively few exceptions to this were families who used the rent-free period to sell property in Syria, or families who established income from overseas remittances during the tenancy period. Households with relatively more disposable assets, including cash and wedding jewellery had generally expended this prior to moving into NRC housing. While some beneficiaries were able to use the rent-free period to stabilise themselves and repay debts, the requirements to pay associated household operational expenses such as electricity, heating, cooling, water and sewerage remained a burden for many families with limited means. For families in more remote properties, transport costs also remained a challenge.

While NRC's assistance was very valuable for the beneficiaries who received it, the lack of complementary legal livelihoods options and the declining rates of donor assistance mean that the shelter programme faces unrealistic expectations to fully resolve beneficiaries living situations. The most

common coping mechanisms listed in focus groups including selling family and household assets, seeking illegal informal work opportunities (and running risks of police detention, fines and deportation), forging documents, moving in with extended relatives, return to camps, and returning to Syria. Research papers have noted other significant examples of negative coping mechanisms, including early and forced marriage and vulnerability to SGBV and sexual exploitation.

NRC has conducted research on coping mechanisms for shelter beneficiaries, which suggested that shelter beneficiaries were better able to cope during their tenancy – e.g. by spending money on better quality food, repaying debts, accessing medical assistance etc. The evaluation focus group discussions confirmed NRC’s internal research that beneficiaries were substituting expenditure on rent for expenditure on other expenses – including utility bills, medical expenses, education expenses and repayment of loans. Focus group participants had been unable to save money during the period of NRC’s rent free assistance due to this substitution effect, so while they may have reduced their expenditure on rent this did not result in accumulating a buffer of savings which could cushion their transition to a new property at the end of the rent free period.

Lack of current MOI Service Cards has a significant impact on Syrian refugees, and can also lead to negative coping mechanisms. These negative coping mechanisms can include restrictions on movement / remaining at home, registering some family members (e.g. men) but not female family members, leaving them isolated at home; lack of trust and confidence to approach the police for assistance or to approach other Government services; obtaining fraudulent documents or sharing documents, or making payments to expedite the service card renewal process (including paying for medical certificates without receiving a medical examination). Assisting beneficiaries to obtain MOI service card re-registration should provide cascading benefits – access to Government services, financial savings from avoid more expensive private services, less fear of the police and greater freedom of movement, etc.

In the absence of legal work options, families rely on remittances, consuming savings, selling WFP food vouchers rather than using them for food, or working informally. Restrictions on legal work opportunities leave Syrians vulnerable to exploitation – several focus group participants reported being arrested and detained by the police, while others reported being exploited by bosses who refused to pay them for the work they had done and threatened to report them to the police for deportation.

4. ‘Is NRC reaching the right people?’

This issue is addressed in detail under Question 6 – coverage. However, in summary, NRC is providing assistance to Syrian refugees who are living in poverty in urban areas of Jordan, outside of camps. This is a large but appropriate pool of beneficiaries to target, due to their demonstrated need. However, NRC does not explicitly target the most vulnerable beneficiaries within this pool, for several reasons:

- Financial barriers, restrictions on freedom of movement and geographic distance prevent the most vulnerable refugees from approaching NRC’s services through the drop-in centre and telephone hotline. NRC has limited proactive outreach due to the current high waiting lists.
- NRC undertakes geographically based matching, to reduce the protection risks associated with relocating people across districts and Governorates. In an area with greater supply of housing

NRC may be able to assist many clients, while extremely vulnerable clients may wait longer if there are not available housing units in their area.

- NRC's predominant shelter option is relocation, with a renovation option recently commencing. Relocation may not be an appropriate option for extremely vulnerable families, including people who do not have sufficient funds to meet ongoing cost of living such as utility expenses. It may raise a number of protection issues, including breaking social ties with the local communities, registration process, access to schools and hospitals
- NRC's shelter programme has targeted larger families over small ones, due to a shortage of small housing units available on the market and because it is more cost efficient to assist larger families. Small families (e.g. small female headed households) may be extremely vulnerable, and they are often left on the waiting list and are not eligible for NRC assistance, unless they artificially combine with other families, which then creates a range of further protection and social issues. Focusing on larger families has been a result of the housing market availability and has provided better value for money, as additional people are accommodated at lower marginal costs, and the staffing costs of follow-up visits are spread across more beneficiaries. However, across the sector it appears difficult for small families to access shelter assistance.

NRC's ICLA programme provides valuable services to Syrian refugees, predominantly those refugees who are also shelter beneficiaries (and who may have received other NRC services in addition). These beneficiaries have been assessed through a vulnerability assessment tool, and their selection for shelter assistance confirms that they are clearly in need. While these beneficiaries are in need, they are unlikely to be the 'most' needy or might not receive assistance and remain on waiting lists, for the reasons outlined above.

Providing shelter beneficiaries with complementary information, counselling and legal assistance is a valuable contribution, and helps make NRC's service more holistic. However, there is a substantial pool of additional potential beneficiaries who do not receive shelter assistance but would benefit from ICLA assistance. Subject to obtaining approvals from the Government of Jordan, ICLA could readily be scaled-up to have a stronger focus on assisting non-shelter beneficiaries. For example, greater emphasis could be placed on providing assistance to shelter applicants who are unlikely to receive shelter assistance in the immediate future – for example, 'low' VAF priority families could benefit from information and assistance to formalise and register their current lease or deal with utility issues at their current property, rather than waiting for shelter assistance which is unlikely to arrive quickly, if at all. ICLA does not systematically search out other potentially vulnerable beneficiaries who could benefit from ICLA assistance – such as new mothers who married early and do not have a valid certificate of marriage to use as evidence to register their newborn child.

Basic services could potentially be delivered to poor Jordanians in addition to poor Syrians – for example, a tenancy advisory service could easily provide basic tenancy information and advice to low income community members, without potentially exacerbating community conflicts by differentiating between services provided to Jordanians and Syrians. This approach would also align more closely with the Government of Jordan's resilience programming strategy under the Jordan Response Plan.

Relevance/Appropriateness

Overall: The programme is extremely relevant and appropriate, and targets a critical need. The operating environment has evolved rapidly during the course of programme implementation, and the programme should further evolve to meet these changes – notably through introducing a broader range of shelter programme options, and expanding the pool of targeted ICLA beneficiaries and range of ICLA services offered.

1. What recommendations can be made to adjust the theory of change and improve the appropriateness and impact of the programme, given an increased understanding of the validity of the underlying assumptions?

The shelter / ICLA programme operates under one logical framework for the core competency of shelter and a second logical framework for the core competency of ICLA.

The Shelter programme aimed at responding to the lack of available, appropriate and affordable housing units by increasing the number of units to house the newly arrived Syrian refugees, whilst limiting the impacts on the rental market from strong inflationary growth, stimulated by a shortage of properties and booming demand, including demand driven by Syrian refugees. The programme has commendably managed to increase the number of rental properties and provided housing to Syrian refugees for a fixed period of time.

The initial intervention logic was based on the presumption that the shelter assistance provided by NRC could act as a kind of ‘circuit breaker’ – i.e., that in the period when the beneficiary family lived in shelter accommodation, access to livelihoods combined with the significant savings that they made from not paying rent (the largest household expense) would allow them to ‘get back on their feet’ and live independently and with dignity after the conclusion of the 12-18 months lease. However, due to a multitude of factors (lack of access to legal work opportunities, decreases in assistance provided by the international community, increased charges for access to health services, etc.), beneficiaries have had little capacity to live independently of donor assistance at the end of the lease. The support from NRC has helped to reduce the use of negative coping mechanisms, but has not eliminated the need for these.

Other underlying assumptions included:

Explicitly

- All refugees have legal documents (either from UNHCR or GoJ)
- The Government of Jordan would be supportive of the humanitarian response (and shelter programming,
- Permission would be given to NRC by the Government of Jordan to undertake activities
- Landlords continue to accept Syrian tenants – (that Jordanian host communities and landlords would continue to welcome Syrian refugees into their communities and houses, and Syrians would integrate smoothly, with the support of NRC where required.

Implicitly

- Refugees would be permitted freedom of movement, including to access services, relocate to different districts or governorates, etc.
- Syrian refugees would be willing to access services provided by NGOs, without fearing the services were aligned with political groups in Syria or Jordan.
- The crisis in Syria would be relatively short-term, and Syrians would plan to return to Syria in the short to medium term.
- International donors would continue to fund the Syrian response at similar levels, allowing complementary support (such as WFP food vouchers) to continue at similar levels.

Most of the assumptions detailed above did not materialise, and this has had a significant impact on the feasibility of the theory of change. The objective of the programme, which was to ensure that Syrian refugees could rebuild their lives and become more resilient to prolonged displacement,¹⁵ has been achieved to some degree, but has not been fully achievable due to the significant deterioration of the operating environment.

The current context has changed in many ways. Due to the restrictions and effective closure of the Syria / Jordan border, there are no longer the large scale cross-border movements which were common when the Shelter / ICLA programme commenced. There are less actors responding to shelter needs, and there is less funding available to support vulnerable families. The Government of Jordan has taken a stronger role this past year in the coordination of the humanitarian response, and is encouraging the donor community to also focus on resilience programming which supports host communities. It appears that the Government of Jordan is concerned about initiatives which may encourage Syrian refugees to settle in Jordan for the long-term, due to issues including security, impact on education and medical services, etc. The Government had temporarily suspended the approval of all shelter programmes, pending authorisation (or re-authorisation) of these programmes.

The initial shelter programming approach was a balance between providing physical shelter and rental market stabilisation and sustainability. The current formulation places less emphasis on the initial rental market stabilisation approach and more emphasis on providing physical shelter, promoting positive coping mechanisms and minimising negative coping mechanisms, and promoting security of tenure. Placing an increased focus on meeting the shelter needs of beneficiaries creates opportunities for a broader range of shelter programme options.

The ICLA logical framework is comprehensive and provides a framework for a broad range of programme activities. The logical framework describes services to be provided to 'targeted beneficiaries' without defining who these targeted beneficiaries are. During implementation, the targeted beneficiaries have predominantly been shelter beneficiaries, due partly to the organisational structure and also to the sensitivities in carrying out ICLA programming. Hence, while the logical framework provides scope for a broad range of ICLA interventions servicing broad classes of beneficiaries, in practice the programme has been implemented in a more focused way.

Recommendations:

¹⁵ Shelter Programme Macro Logframe

- Align the theory of change with the evolved programme approach, which places less priority on rental market stability and increasing medium-term housing stock, and more emphasis on meeting shelter needs and minimising negative coping mechanisms, while working in a sustainable way.
- When reformulating the theory of change, reference should be made to the Jordan Response Plan where feasible, to support the alignment between the Government’s strategy and programming approaches. In particular, there are elements of the Government’s resilience strategy requiring support to host communities, and NRC’s programme descriptions could also align with this language where relevant. There is perhaps some value in being able to clearly demonstrate to the Government and stakeholders NRC’s support to Jordanian communities, for example through cash grants to landlords, work opportunities for contractors and construction workers, employment opportunities for Jordanian aid workers, in addition to important resilience measures such as collaborative dispute resolution.
- If Shelter / ICLA shift to a more area based / community based programming approach as recommended, this should be reflected in the theory of change and logframe.
- While the programme promotes security of tenure, much of these efforts are focused on security of tenure for shelter beneficiaries, with a particularly focus on the period that the beneficiary resides in NRC shelter accommodation. Valuable ICLA initiatives, such as the new model tenancy agreement prepared by ICLA could be expanded upon to promote broader security of tenure.
- A revised theory of change could also be informed by a housing market study, including affordability and the appropriateness of housing designs. UN-Habitat has carried out a Housing demand survey, in collaboration with the National Authorities. This report has not been published yet but should contain useful data and findings on which a more detailed rental market study could be built.

2. To what extent are the differing needs of the various sub-groups that the project serves (and especially women, girls, boys and men, or people with disabilities) taken into account, including both the need for shelter and need for information?

The evaluation process included a number of key informant interviews and focus group discussions with beneficiaries disaggregated in various dimensions – including gender, location, urban vs. rural residents, beneficiaries with special needs, etc. The interviews aimed to better understand whether and how their needs were met. The focus group discussions provided extremely valuable and illustrative examples, although they are not necessarily statistically representative of the entire beneficiary population.

The Urban Shelter Programme was designed in late 2013 and has significantly evolved since the inception of the programme. The implementation methodologies, such as the assessment form, the staffing of the social team, the matching process through data sharing tools, the coordination between the social team and the planning team has significantly improved to better respond to the differing needs of the various sub-groups that the project serves.

Gender dimensions:

The programme is overall targeting larger families. We understand that this is primarily due to the fact the small properties are less available on the market, and perhaps also since smaller families provide less value for money per person as the costs of assisting a small family unit are similar to the costs of a larger family unit – as the most significant rehabilitation costs relate to the kitchen and bathroom, which may then service one or several bedrooms. The potential negative effect of the programme is that some families, who would not usually live together, regroup to benefit from the programme. Tensions have arisen due to the number of people in a relatively confined apartment, and these tensions impact mostly on women as they tend to spend more time inside the house, while the males may go out to pursue informal work opportunities.

NRC does make an effort to accommodate extremely vulnerable families, including women-headed households. However, due to the shortage of small housing units and NRC's focus on larger shelters, this is not always possible. In theory it would be possible to place an extremely vulnerable family by themselves in a large property, however this is not a very efficient use of resources. In theory it may also be possible to place an extremely vulnerable family with another family, however this is not ideal for protection and cultural reasons. There may be rare circumstances where it is possible to mix families for short-term / emergency purposes, such as female headed households without male members. However, in such emergency situations, an emergency shelter with access to proper psycho-social support is more likely to be appropriate than placement in a mixed house.

Many focus group participants expressed concern over the location of the accommodation, and the distance to access basic services such as shops, schools and medical services. The concerns expressed by females and males were slightly different. In particular, some women raised concerns over the safety issues involved in walking long distances, particularly where the community was less receptive to Syrian refugees. Men (particularly men without valid MoI registration cards) noted the increased risks of being stopped and detained at police checkpoints, which are more prevalent in some locations. Both male and female focus group participants expressed concerns over the safety of their children – including when playing outside the house, playing with Jordanian neighbours or walking through the neighbourhood. NRC has improved the ways in which beneficiaries are matched to properties, which has reduced some concerns caused by more distant relocations (including accessing new services like schools, loss of social networks and support structures etc.).

Some of the female tenants also expressed their concern about not having security grills on windows, which poses a security concern especially for families on the ground or first floor, but also raises safety concerns where mothers are worried of having their children fall out of the windows. Grills are not required under NRC's bill of quantities. However, in some residential areas fitting grills is common practice, especially on ground floor windows. Failure to install comparable levels of security could risk the safety and security of these tenants.

Some female and male focus group participants also reported cases of harassment by landlords. Some landlords have reportedly been taking advantage of their tenants, making their lives very difficult, restricting their use of the property, prohibiting children from playing outside, and encouraging them to move out so they could use the property for their own purposes. The ICLA staff were able to assist with

many landlord – tenant disputes. However, community – tenant disputes have been more problematic for ICLA to address. ICLA’s focus has been on the relationship between the landlord and the beneficiary, and this also relates to the relevant output in the ICLA logframe¹⁶. This allows ICLA to address issues such as disputed utility bills, damage to property etc. Where the other party is a neighbour or community member (e.g. in complaints around privacy and use of the property, throwing stones at children and harassment etc.), ICLA appears to have been less able to act. Some ICLA staff suggested that in these cases there was nothing that could be done, as they had no influence over the neighbour to compel them to participate in CDR. They thought a visit from the Jordanian lawyer to warn the neighbours might help, or might exacerbate the situation further. There was the suggestion that perhaps the landlord was trying to drive out the beneficiary, and was using the neighbours to achieve this – although it is not possible to know if this is true or not.

When NRC relocates a beneficiary into a community, it does take some additional responsibility upon itself for the care and protection of that beneficiary – at least, a do no harm approach is required. NRC’s expertise in collaborative dispute resolution could easily be leveraged to assist in these kinds of cases – particularly with the involvement of respected people from the community, who NRC would ideally identify in advance and provide CDR training to. While the numbers of cases of beneficiaries in problematic neighbourhoods are reportedly low, ICLA’s CDR work should be able to extend beyond landlord – beneficiary disputes where appropriate.

Community concerns relating to the MOI service card re-verification and fear of arrest have led to some shifting patterns of movement. Focus Group participants reported that they will now send female family members or elderly family members to engage with the Government (e.g. to register a lease) as they believe there is less risk of the women or elderly being arrested and returned to camp or deported. Some focus group respondents have suggested that ICLA improve their engagement with female religious leaders, who may be well placed to assist in resolving disputes involving women. ICLA could provide a form of CDR training / orientation for these female religious leaders, however, increased engagement alone would also be a useful starting point.

ICLA has provided some assistance on birth registration and family and personal status law issues (e.g. obtaining registration of an informal / sheikh marriage to enable the family to register the birth of their child). ICLA could expand its work further in both CDL and HLP issues affecting women.

Special needs:

The matching process was the main concern for tenants with special needs, including people with physical disabilities, elderly people etc. These beneficiaries needed to make sure that the new property proposed was close enough to services and on the ground floor for accessibility purposes (avoiding problems by requiring beneficiaries to ascend stairs). Many tenants reported being told that if they didn’t accept the proposed property, they would be excluded from assistance under the project. Some

¹⁶ NRC ILCA Logical Framework 2014 - 3.2 Disputes arising between refugee tenants and host landlords are managed and resolved in a mutually acceptable manner

tenants then felt that this would be their only opportunity of receiving support, and even if it did not meet the accessibility criteria or proximity to services, some tenants preferred to receive a less preferable house than to receive no assistance. One focus group member reported the challenges of accepting a less than ideal house, and caring for a disabled family member living in a third floor apartment.

We understand that the matching process has been improved since early implementation of the programme, which aims to provide more tailored matches. However, we understand that at least some beneficiaries are still told that they must accept the proposed accommodation or they cannot receive assistance. We understand that this issue is also a source of concern between the shelter team who sources the accommodation and matches the beneficiary and the ICLA team who is responsible for providing follow-up support.

Children

Relocation to a new area has in some case affected children who experienced difficulties in registering for a school in their new location. We were advised during the evaluation that the Ministry of Education had required parents or older students to produce an updated and valid MOI card (i.e. to have completed the re-registration process), and although this policy had been reversed, some school principals were still requiring the new MOI cards to be produced for new enrolments (while previously enrolled students could continue under their previous enrolment). We understand that UNHCR and UNICEF were monitoring this issue, to address problems as they arose, and that ICLA had recorded 108 Syrian parents who had been unable to enrol their child or children in schools in a new area outside the refugee camps (based on analysis conducted between August and October 2015). The implications for NRC are to consider the potential impact on school aged children when relocation takes place, and also to provide information to beneficiaries on the school registration process. There may be certain times of the year when it is easier for families to move and register children in the new school, for example.

Anecdotally, one father mentioned his appreciation for NRC's programme as with the money he saves by not paying for rent, he has been able to pay the transport fares to enrol his children in a 'better' school which is further away.

As discussed elsewhere, there have been suggestions of protection related issues for juveniles where families artificially combine to become eligible for NRC shelter assistance, and live in the same property. There was a suggestion by a single respondent that unrelated children had been brought from the camp and passed off as family members to obtain assistance. It was not possible to verify the second concern, but some focus group participants freely agreed that they combined with their extended family to register with 9 or above people.

Landlords

We mention landlords as a separate group to briefly flag several issues.

One issue is the basis on which NRC engages with landlords – are landlords a contractor to NRC, who provide a required service? If so, do the demographics of the landlord matter – does it matter if the

landlord has one property with NRC, or has developed several properties with the assistance of NRC? Does it matter if the landlord is male or female? Are the main selection criteria whether the landlord is capable of providing suitable accommodation in a suitable location and willing to rent the accommodation for a period to a Syrian refugee, and willing to permit the refugee to have 'quiet enjoyment' of the property without harassment?

Or is the landlord also a beneficiary of the programme? Are we concerned to ensure that the benefits of the programme are spread widely, that male and female landlords benefit, that we give priority to poor landlords who might not otherwise be able to complete their house construction?

Whichever approach is selected will involve trade-offs in property selection – Should NRC decline a suitable property in a good location because the landlord had already benefited from the programme? Should NRC accept poor landlords into the programme, who may not have the money available to complete the property? (We do recognise that NRC's approach has been creative in places, such as allowing a poor landlord to remain in the property for a short period after construction was complete so they could save money to move out and allow the tenant to move in).

The evaluation team did not have a firm view on the nomenclature of landlords as contractors or beneficiaries, and we understand that NRC may now consider landlords as contractors for shelter but beneficiaries for ICLA security of tenure work. What we did consider important is that NRC can describe to the Government and donors the ways in which its engagement with Jordanian landlords and Jordanian communities is also benefiting those landlords and communities – through repairing houses, finishing houses, job creation in the construction industry, boosting sales for local businesses etc.

The evaluation team did note that some beneficiaries / tenants were vulnerable to exploitation by landlords who are former or current military personnel. The military ID cards cannot be photocopied and used to register the lease at the municipality, so the original ID card must be presented instead – generally by the landlord. Some landlords have reportedly taken advantage of this to negotiate and register a new lease with the tenant, requiring the tenant to pay rent or changing the form of the lease to reduce the tenant's legal rights. NRC should ensure that particular support is provided to any beneficiaries with landlords who may be in a greater position to abuse their authority e.g. potentially by avoiding the selection of these landlords, ensuring that ICLA staff accompany the landlord and beneficiary when the lease is registered, advising the beneficiary that they should contact ICLA if the landlord wants them to sign a new agreement, etc.

Some team members believed that increased participation by ICLA during the identification and selection of landlords would help in avoiding landlords who may have rigid attitudes, or who may be more likely to exploit beneficiaries. The evaluators are not certain that ICLA would have any special ability to identify problematic landlords, however we appreciate that the initial property selections when the programme first started may have been more driven by technical engineering rather than social factors. The involvement of someone during property selection tasked with championing the consideration of social factors rather than technical engineering factors would appear to be a useful counter-balance. Civil society representatives also proposed their services (or the services of their organisation) in helping to identify and avoid problematic landlords.

Referral mechanisms

Much of ICLA's work involves providing information on access to essential services, including providing referrals to other NGO and CBO services for further assistance where required. During the evaluation, NGOs and CBOs were complimentary about the way in which ICLA made referrals, and followed up on the referral through designated contact points to ensure that the receiving organisation had confirmed receipt of the referral and acted upon it. This referral mechanism followed a process where organisations had defined their areas of service provision and referral pathways, and entered into agreements to govern the relationship between NRC and partner referral organisations.

We understand that there are no decentralised Protection Working Groups in Jordan, and so the main forum for any protection concerns to be addressed would be through general UNHCR coordination meetings.

Recommendations:

1. Consider a tighter selection process for landlords, ensuring that they are aware of the programme and conscious that another family will be occupying his property and that they will have the right to enjoy the property grounds, invite guests etc.

The evaluation team noted that the most common disputes between landlords and tenants related to use of the property (e.g. noise and guest visitors, privacy violations, use of rooftops and balconies), property condition and damage (sometimes caused by the relatively high occupancy rates), and attribution of bills (water, sewerage, electricity etc.). The numbers of very problematic landlords had been very limited. While the ICLA team may be able to identify some unsuitable landlords, many of these issues are typical for a tenancy programme, and there is no guarantee that any assessment would identify all unsuitable landlords. It is also feasible that the Shelter team could pay more attention to this issue during landlord selection. NRC does have limited recourse once the construction is finished and the final payments have been handed over to the landlord in lieu of rent. NRC could strengthen its capacity to work with the community to resolve disputes – including training female religious leaders and community representatives in CDR relating to HLP issues.

2. Greater attention could be paid at the orientation stage to ensuring that landlords and beneficiaries are in agreement on the division of bills. At present, an extensive amount of information is provided during orientation and it is possible that at least some beneficiaries are overloaded with the information and unable to process it completely. NRC could review the information which is provided to beneficiaries at various stages, to ensure the information is relevant and to prioritise the most important information where there is risk of overload. This should also take into account the beneficiaries' background – those with low literacy would likely need information provided in different ways.

3. As discussed elsewhere, the development of a portfolio of programme shelter options would allow NRC to provide the assistance which was most appropriate for the beneficiary's situation. It would also allow NRC to assist some extremely vulnerable beneficiaries, whose situation is not appropriate for the current shelter options.
4. That NRC review the way that property offers are conveyed to all beneficiaries, but especially to beneficiaries with special needs. It is essential to avoid the situation where beneficiaries may feel pressured into accepting an unsuitable property, because they believe this is the only way that they will receive any assistance from NRC.
5. Ensure that NRC is avoiding harm, particularly for beneficiaries with special needs. For example, small families who are in practice not eligible for NRC's relocation assistance may combine with other adults to present as a large family which is eligible for assistance. This creates risk of abuse, and also creates negative community sentiment, especially in more conservative host communities who object to the extended or artificial Syrian family living together. Having a broader range of shelter programming options would reduce the need for families to artificially combine to be eligible for assistance. Care should also be taken to do no harm when relocating people, particularly when relocating beneficiaries into neighbourhoods which are known to be hostile towards refugees.
6. Consider reviewing housing standards, potentially with community involvement, to ensure that they are appropriate for the specific community where they will be implemented – for example, that provisions are made for security grills if placing beneficiaries in areas where these are commonly installed.
7. Consider a more structured communications approach – in landlord and host community focus groups, participants raised concerns that Syrian refugees would damage their properties, refuse to voluntarily move out at the end of the lease period, and harass their neighbours. NRC could strategically engage with local media channels to help address some of these concerns – for example, by promoting good news stories where beneficiaries willingly left the property at the end of the lease, paid their final bills and left the property in good condition.

3. Given the project design to move beneficiaries from one residence to another, how can the project be improved to maintain beneficiaries' abilities to access services?

The programme has been designed on the basis of relocating families to newly finished properties. In its inception the programme staff highlighted issues with the matching process and found it difficult to find beneficiaries willing to relocate to the areas where properties had been "finished". As mentioned above the matching process was later improved, implementing better coordination between the social team and the planning team, through data sharing tools to identify the number of properties required in each localities to reduce relocation from one area to another and to better respond to the differing needs of the various sub-groups that the project serves.

According to the *do no harm approach*, relocation should be limited to the absolute necessary. Indeed, moving people from one area to another might be creating more harm than good, since beneficiaries might not be able to access to services, informal employment opportunities and schools in their new location. Further risk and protection associated with the re-registration process of MOI cards have developed in 2015, whereby Syrian refugees might not be able to re-register – for example, due to financial constraints, due to missing or irregular document, etc.

Where beneficiaries have relocated (and particularly where beneficiaries are relocated into a new district), the ICLA team meets with beneficiaries to provide them with legal information about access to essential services in the new area, and the re-registration process. ICLA may also provide legal counselling to assist a beneficiary with the registration process, or provide a referral to another service to provide legal assistance – for example, to provide a referral to a legal aid organisation to accompany the beneficiary to the police station for re-registration if it appears that their documents are irregular (e.g. fraudulent documents, bail out expired etc.). Based on feedback from stakeholders during the evaluation, ICLA appears to be implementing the referral process well.

NRC’s internal monitoring suggests that between 70-80% of beneficiaries ¹⁷ seek to implement the information and counselling they receive from ICLA – for example, that 82% of people could use the advice to help implement their HLP rights, while 69% of beneficiaries who received advice then sought to use the information to obtain or update their civil legal documentation. Notably, neither is a measure of the success of the attempt, but it does suggest that the information counselling and empowerment approach can be suitable for many beneficiaries.

During the focus groups with tenants who have move-out early or after the end of their lease, the respondents advised that they moved out:

- because the physical property was not suitable for them (size, condition, building level / floor, cost of heating / cooling / utilities etc.) or
- the property location was not suitable, due to the distance to services and livelihoods, lack of available transport and the expense of paying for transport, and the fear of arrest and detention during movements.

“I was living in a remote place in a mountainous area with poor services. During the snow I was stuck in the house for 10 days. It’s a good project, but the remote locations cause us to spend money. Transportation is expensive, services are far away. There was nothing in the place where we stayed ... bread, vegetables etc., it was about a 1km to walk or pay 1 JD for transport.... I moved out 5 months before the end of my lease and now I stay in Irbid town. We were 18 in the NRC house with my sister’s family but now we are 8.” ¹⁸

“There should be more properties in the city. I was living in a rural area and I was matched into the same area. We registered hoping to get a place closer to the city. I want to be close to the city so my son can work. Transportation from the village to Irbid is expensive and people spend

¹⁷ E.g. ICLA outcome monitoring draft report, April 2015

¹⁸ Focus group discussion tenant, 30 August 2015

most of their money on transport – when you finish work late at night there are no buses and you have to pay for a taxi”¹⁹

Although relocation has a place as a shelter option by increasing housing stock and providing adequate and safe housing to Syrian refugees, there are concerns regarding a systematic approach of offering only relocation. NRC has recently introduced a renovation option to complement relocation, although as the programme is still relatively new the number of suitable households benefiting from renovation has been reasonably limited to date. Other actors are providing cash for rent and repairs, however at a very small and infrequent scale.

Renovation, repairs, winterisation and sealing-off should be prioritised when appropriate to limit the protection concerns around relocation.

Some respondents reported that there was little or no opportunity for beneficiaries to view the proposed accommodation or the general area before they moved into the property. They were assigned their ‘matched’ property and invited to accept the property, in at least some cases with reportedly limited information. This approach does not encourage clients to make informed and empowered decisions. We appreciate that there is some tension between delivering an efficient shelter programme, which requires occupying available housing units, and undertaking client centred programming, which might give clients more choice but involves additional work and the likelihood that less desirable accommodation would remain vacant. However, where there are significant protection and safety concerns associated with proposing inappropriate accommodation, NRC should continue to improve its matching processes to reduce inappropriate matches, take prompt action to redress inappropriate matches where they have become apparent and provide as much scope for beneficiaries to make empowered, informed decisions as possible. All measures should be taken to ensure that beneficiaries do not feel pressured into accepting inappropriate properties, particularly where relocation to another district is required.

Recommendations:

1. While there is definitely a place for relocation as a shelter option, especially in a tight rental market with limited housing stock, the significant cost of relocation and the potential protection concerns suggest that relocation should be treated as a final option, rather than the preferred option. Other shelter actors have also reduced the scale of the support they previously provided, which creates additional demand for non-relocation assistance. Beneficiaries should be relocated only when the property cannot be repaired or renovated, and when the relationship with landlord or neighbourhood has irretrievably deteriorated and cannot be resolved. NRC should expand their portfolio of non-relocation assistance.
2. Where relocations take place, they should be ideally within the same locality, to minimise protection issues, disruption to social support networks, informal livelihoods and schooling, etc. NRC should continue to improve the matching process

¹⁹ Focus group discussion former tenant, 30 August 2015

3. NRC should continue to improve its matching processes to reduce inappropriate matches, take prompt action to redress inappropriate matches where they have become apparent and provide as much scope for beneficiaries to make empowered, informed decisions as possible. All measures should be taken to ensure that beneficiaries do not feel coerced into accepting inappropriate properties, particularly where relocation to another district is required. NRC should review its procedures and the implementation of these procedures to ensure that a beneficiary focused approach is adopted, and monitor the risk of potentially coercive practices.
4. Where relocation is required, NRC should consider the impacts on school aged children, including school enrolment requirements and registration periods. Beneficiaries should be made aware in advance of the move that it may be difficult for their children to re-enrol in school at certain times of the year, especially if the school is in a new district and updated MOI service cards are required for enrolment (We note above the varying practices of school authorities on this issue). It may be that ICLA staff can accompany beneficiaries who have problems registering at a new school, or that NRC can assist through its education programme or via coordination with UNHCR. There may also be certain times of the year when it is more convenient for school aged students to relocate (e.g. before the normal school enrolment period).

4. To what degree is the project designed and implemented based on the opinions and the participation of affected populations?

The project was designed to fulfil several purposes:

- To respond to an identified gap in the market of available and appropriate properties for the growing Syrian refugee population in urban areas.
- To limit the impact on the host community and limit rent inflation, by increasing the housing stock and providing newly finished properties, and
- To provide safe and adequate housing to allow Syrian refugees to enjoy relatively stability and security of tenure for a fixed period.

We understand that during the initial stages of the programme design, NRC Shelter and ICLA spoke with a broad range of stakeholders including representatives of host communities, Syrian refugee representatives and Government of Jordan representatives at the national and municipality level. Due to staff turnover, it has not been possible to obtain specific details of these discussions. However, the stakeholders interviewed during this evaluation confirmed that NRC's initiatives were appropriate and targeted issues of concern to them.

It appears that as the programme launched, NRC made significant efforts to establish relationships with stakeholders and raise awareness of NRC's programming. This outreach emphasised shelter services rather than ICLA services.

Over time, it appears that this outreach and engagement with stakeholders has reduced. This is perhaps due to several reasons:

- As the shelter programme became more widely known, NRC has established a long waiting list of beneficiaries. External engagements may have reduced to prevent creating an even larger waiting list and creating unachievable expectations.
- At the time of the evaluation, the approval of all shelter programming (including NRC) had been suspended by the Government of Jordan. NRC suspended the approval of new properties during this period, and also used the period to emphasise internal improvements, staff shadowing and professional development.
- Many of NRC's staff working in Irbid come from Amman and perhaps do not have relatives or close ties in the areas of operation that would help to facilitate community engagement.

What is apparent now is the desire for a range of stakeholders to have a closer engagement with the project.

There are some areas of NRC's programming which are sensitive, and may not be appropriate for close engagement with stakeholders – for example, third party involvement in beneficiary screening and selection may invite opportunities for corruption (e.g. requiring beneficiaries to pay to be registered with a service, or payments to expedite placement in accommodation etc.). It may also undermine NRC's reputation in the community if people believe it is possible to access NRC services by '*wasta*' or backdoor methods.

There are other areas of NRC's programming which are more general and could be suited for broader consultation and stakeholder engagement – on either an ad-hoc basis or through a structured regular engagement, such as a community advisory committee. This could help to have greater buy in and support from stakeholders, including host communities, Syrian refugee communities, and the Government at municipality and national levels.

For example:

- Technical standards for construction – NRC's technical standards meet or exceed SPHERE minimum standards. However, during the evaluation process stakeholders expressed a range of agreement and dissent on the technical standards – for example, the quality and extent of finishings, provisions for security, the target number of people per housing unit (bedroom), the focus on larger accommodation vs. smaller units for small families etc.
- Selection of new geographic areas – the municipalities noted that they would be willing to contribute information on where they would like to stimulate development, and where they had identified Syrian refugees in informal settlements or poor living circumstances that they would like to relocate. The municipalities did not appear to be guided by an explicit Community Master Plan, but they did have a sense of where infrastructure such as water, sanitation and electricity could cope with additional demands and where encouraging new development would overload existing infrastructure.
- Screening of potential landlords / beneficiaries – several CSOs were keen to be involved in this part of NRC's process, as they believed they could use their special knowledge to prioritise people in need (e.g. families who the community knew were not getting remittances from overseas), or in helping to avoid landlords who were not appropriate for the programme (e.g., those landlords who would take the money for the rehabilitation and then encourage the beneficiary family to leave). As noted above, there would be considerable sensitivities if NRC did choose to engage in this way.

- Beneficiary integration and conflict management – through ICLA’s CDR work and NRC’s community engagement, NRC has had some engagement with key community representatives in helping to manage conflicts, particularly those conflicts which were not susceptible to legal approaches. There appears some potential to expand this role to better deal with HLP issues in communities, particularly HLP issues relating to neighbours rather than landlords. It may also be possible (although going beyond the pure scope of ICLA and moving towards community development work) to assist in dealing with higher level confidence building between host communities and Syrian refugees placed in the community by NRC, perhaps by working with CBOs on CDR type activities. Ideally this work could be done proactively, in addition to responding to issues as they arise. Greater stakeholder input in the selection of geographic areas may also assist in identifying areas which are more or less receptive to Syrian refugees – although this dynamic can also shift rapidly.

We understand that UNHCR also supports a series of dialogue processes involving host community leader dialogue, Syrian refugee leader dialogue and host community – Syrian refugee dialogue. These processes provide a forum for identification of issues and management of community tensions. Where relevant, it may be feasible for NRC to benefit from these dialogue processes. For example, NRC could request UNHCR provide information on shelter related issues coming through the dialogue processes, or request UNHCR to include shelter issues as a topic for discussion and feedback during the dialogues.

NRC is accessible to stakeholders and beneficiaries through a telephone hotline and a drop-in centre in Irbid. NRC has periodic use of an office provided by the municipality in Jerash, and plans to open a new drop-in centre in Jerash. These services have the potential to provide better access to information and assistance for beneficiaries living in the local area. This is particularly important given the constraints which limit the travel of beneficiaries without valid MOI service cards. However, to be most effective the drop-in centres and telephone hotline should build upon stronger engagement with the community and expand the range of ICLA services they provide, as at present we understand that the majority use of both the drop in centre and telephone hotline is to apply for shelter registration or to follow up on shelter registration applications.

Recommendations:

1. We note the requests from municipalities and local civil society to have a closer engagement with the programme. This may be appropriate on some issues (e.g. seeking the suggestions of the municipality of areas where it is encouraging development and has infrastructure in place to meet additional demand). It may be inappropriate on other issues (e.g. prioritisation of shelter recipients).

We suggest that NRC adopt a community or area-based approach to its programming. In some locations, NRC has worked intensively (for example, in more than 10 houses in one street), which impacts on the neighbourhood in terms of demand on utilities, health and education services, changing neighbourhood culture and potential for integration or conflict, etc. Dealing with these issues sensitively and comprehensively requires a more holistic approach than dealing with individual landlords and beneficiaries.

An area based approach also has potential to bring greater synergies with NRC's programming – for example, engaging with parent / teacher associations in schools supported by NRC to promote ICLA issues (such as civil and legal documentation, security of tenure etc.) and to promote community approaches to conflict resolution and tolerance (e.g. community dialogue) rather than individual landlord / beneficiary focused initiatives (which are less effective when the landlord is not a party to the dispute – e.g. harassment by neighbours).

The establishment of a drop-in centre in Jerash will help to create additional opportunities for community and public engagement. However, beyond a physical space, it is important for NRC to maintain deeper relationships with community leaders and representatives in the areas where it is working.

2. We note that there are some parts of NRC's programming which may be inappropriate for participatory processes – for example, community involvement in beneficiary selection (which was suggested by many civil society representatives) may create perceptions of bias and opportunities for corruption. However, there may be some components of NRC's programme approach that could benefit from community consultation. For example, there could be community level consultations on model construction standards which go beyond the SPHERE standards, to help explain NRC's approach and have informed dialogue about whether the model standards have been set appropriately (for example, excluding security grills in insecure areas). Changes in the standards would have consequential effects – i.e., additional money budgeted on each house would decrease the number of housing units which could be finished, and less crowded properties would lead to fewer beneficiaries receiving assistance.

5. To what extent can the programme be increased to a scale appropriate to match the needs of the context?

According to the UNHCR, over 50% of the household expenditure is on rent. With 86% of the refugee population assessed as living under the poverty line, there is an undeniable need to scale up shelter assistance.

Completing unfinished units increases the housing stock, and benefits both Jordanians (landlords, contractors, labourers) and the Syrian refugee population. However this shelter option is dependent upon the specific needs of beneficiaries, and may not be appropriate for all beneficiaries due to the requirement to relocate and associated social, financial and protection implications. This shelter option is also comparatively 'lumpy' as beneficiaries receive either significant financial assistance (in the form of rent free housing for a 12-18 month period, a moving in grant, etc.) or financial assistance. Until the introduction of the renovation programme, there was limited scope to support beneficiaries who needed a relatively low level of assistance, or to assist beneficiaries to remain in their current housing where it was relatively suitable.

Currently the Urban Shelter Programme responds to a specific need, with the unfinished housing units and renovation combined with ICLA support. Many beneficiaries might not need any renovation nor

relocation and their main concern is payment of rent. With access to legal employment opportunities and livelihoods being very restricted, many of the focus group members we met with had extinguished much of their assets (cash, wedding jewellery, property in Syria etc.) and had entered into informal debt, typically to relatives or friends rather than commercial lenders.

“We can’t save any money. I had some gold from my wedding when I came, but I had to sell it for 1200 JD. We’re on a neutral budget now – we don’t borrow but we can’t afford to lend money to our relatives in need either. The house in Syria was destroyed. If we went back to Syria we would live in a tent, but we would manage. We didn’t think of rent – we just paid utilities of JD 7 per month. But because the two boys couldn’t find work, we couldn’t really save any money even though we weren’t paying rent because we had to pay for the other things and had no income.”²⁰

Due to limitations of housing stock and programming efficiencies, the Shelter programme currently is less able to provide adequate housing to smaller families. These families can be referred to other actors who provide other shelter assistance, such as cash for rent, however the scale of available assistance has reduced due to lower funding levels and the support available from other actors is limited (and, anecdotally, prioritised towards their existing clients).

For these reasons, we consider that there is a need to scale up the shelter programme. However, in relation to shelter activities, we believe that appropriate scale up would need to evolve to match the current needs. In brief, we consider scale up would most appropriately involve:

- The expansion of the range of shelter programme options, in particular:
 - The expansion of the renovation option, to assist beneficiaries who live in moderately substandard accommodation which could be remedied, and where the beneficiaries have a satisfactory relationship with their landlord. This may involve amending the eligibility criteria for the scale of works of the current renovation programme, to provide greater uptake by beneficiaries.
 - Collaboration with WASH and winterisation activities, potentially in return for rent-free periods.
 - Consideration of cash assistance, for households whose current accommodation complies with minimum standards however they remain extremely vulnerable shelter wise due to lack of available financial resources to pay for rent, utility bills and other household items.
 - Retention of the relocation programme, where beneficiaries live in significantly substandard accommodation, which could not feasibly be rectified, and / or the beneficiaries’ relationship with the landlord or co-tenants has deteriorated irretrievably.
 - Collaboration with other actors such as UN-Habitat, to advocate and promote options for small families such as the design and construction of some small sized housing or core housing.

²⁰ Focus group discussion, former beneficiary 30 August 2015

- Geographic expansion to new areas, ideally identified and selected in conjunction with stakeholders, and chosen to obtain synergies with NRC's other core competency programming, particularly education.

The ICLA programme is providing an extraordinarily high level of service to a relatively narrow pool of beneficiaries, with a relatively specific range of services. ICLA beneficiaries are predominantly also NRC shelter beneficiaries.

The Shelter / ICLA programme was set up to deliberately encourage synergies between the two core competencies. We understand this decision was based partly on lessons learned from NRC's programme in Lebanon, and partly as a pragmatic decision due to the challenges in obtaining authorisations for a stand-alone urban ICLA programme – in part because UNHCR was already working with another urban legal aid service provider.

While noting and appreciating the sensitivities surrounding legal assistance programme (particularly in a context where the Government of Jordan has already demonstrated their preparedness to suspend the approvals of organisations where the Government considered it necessary), it was the general consensus of all but two stakeholders that there was now increased space for legal assistance programming. This programming would still need to be implemented sensitively, and perhaps commencing with less sensitive activities which were demonstrably in support of the Government of Jordan's priorities – for example, encouraging birth registration which is in the interest of the Government, but which also helps establish children's legal citizenship, preserve their future right of return to Syria, and simplify access to future Government services such as education. A political economy analysis may assist in mapping opportunities, risks and potential supporters – for example, it may be that there is significantly more space to operate with municipalities and Governorates rather than at the national level, or that one Ministry is more willing to collaborate than another Ministry.

The acceptance of ICLA activities under the Jordan Response Plan should provide a significant entry point for more diverse and prominent programming, and ideally lead to a stand-alone authorisation of ICLA's work.

At present, ICLA undertakes some activities which would traditionally be the role of a shelter programme – e.g. routine follow-up of beneficiary tenants to ensure that they have information on local services, and to check whether the tenancy is proceeding smoothly. This approach has advantages for ICLA, in that it has provided ICLA with an audience of Syrian refugees who have already been assessed as vulnerable, and ICLA is able to provide services to these beneficiaries. It has some disadvantages though, as many of the follow-ups have been routine (e.g. a general check-in or provision of basic information), which is not the most efficient use of the technical expertise of the ICLA team. In some cases, ICLA's follow up in person or by phone has been very frequent (e.g. monthly or greater), which could potentially be an inefficient use of resources due to 'over-servicing' of clients who have relatively straightforward legal needs, and whose social needs (e.g. livelihoods) cannot realistically be met by the ICLA team.

As an alternative, the shelter team could do general tenant follow up and involve the ICLA team on a case by case basis where specific technical inputs were required – e.g. in the case of a dispute which requires ICLA’s collaborative dispute resolution skills, or assisting with advice on a subsequent lease at the completion of the tenancy.

The expansion of ICLA services would be based around a series of inter-linked programmatic decisions- for example:

- (a) Which beneficiaries are we trying to target?
- (b) What thematic areas of unmet need are we interested in working to address?
- (c) What services delivery models are feasible?
- (d) What staffing structure is feasible, given the financial resources and available human resources?
- (e) What opportunities exist for synergies?
- (f) What external constraints affect programme our programme design?

(a) Which beneficiaries are we trying to target?

The ICLA macro-level logframe does not define the beneficiaries of the programme – it only refers to ‘target beneficiaries’, which are also disaggregated by gender. In practice, the programme has chosen to predominantly focus on existing shelter beneficiaries and on beneficiaries who approach NRC requesting assistance (e.g. people who call the ICLA hotline or attend the drop-in centre), or who are referred to ICLA by other services. ICLA could choose to explicitly target other categories of beneficiaries, including:

- Syrian refugee applicants on the shelter registry, including those who are eligible and waiting for assistance
- Syrian refugees living in informal settlements
- Syrian refugees with specific thematic issues relating to HLP, CLD etc. (e.g. tenants with no written leases, new parents who have not registered the birth of their child, refugees requiring assistance with the re-verification process, etc.)
- Vulnerable Jordanian community members
- Community gatekeepers – community leaders, religious leaders, women’s representatives, teachers, lawyers and mediators etc.
- Duty bearers – Government officials

(b) What thematic areas of unmet need are we interested in working to address?

NRC and ICLA globally have expertise in HLP, CLD and CDR issues. The Jordan project is focusing primarily on issues of security of tenure (through registered legal leases for shelter beneficiaries), provision of information to facilitate access to essential services, collaborative dispute resolution between landlords and beneficiaries. The programme has done some initial work on birth registration and some case work on other CLD issues (sometimes in conjunction with NGO partners) such as registration of marriages and divorces.

There are an enormous range of unmet needs in Jordan which fall within the scope of ICLA’s global expertise. ICLA could realistically add value in many of these areas. As mentioned elsewhere, ICLA could provide a generalist tenancy advice service, for vulnerable Syrians and Jordanians. This would build upon NRC’s already established area of expertise in Jordan, and expand ICLA’s services beyond shelter

recipients. ICLA could work in partnership with the Government and hospitals on birth registration, or in partnership with women’s NGOs on registration of customary marriages and divorce issues, or with municipalities and community groups on addressing informal settlements. The available options for thematic work are extremely broad.

(c) What services delivery models are feasible?

Legal assistance services generally provide one or more of the following services:

- Outreach and awareness - providing general legal information, frequently in group setting
- Legal counselling – providing specific advice, tailored to a beneficiary’s specific situation
- Legal assistance – providing paralegal or legal support – e.g. by accompanying a beneficiary to a police station or court, or writing letters on their behalf.
- Legal representation in court
- Training – of community representatives, Government etc.
- Dispute resolution

The Jordan ICLA programme provides predominantly outreach and awareness, legal counselling and some limited legal assistance. Legal assistance is constrained by the staffing structure, as there are only 2 national lawyers on the project. ICLA Jordan does not provide direct legal representation in court (it does not officially act on behalf of a client in court), although it liaises with national NGO partners to provide this representation where appropriate. ICLA Jordan provides CDR in relation to landlord – tenant disputes for the beneficiaries involved in the Shelter programme, but not for other beneficiaries. ICLA Jordan provides limited training, which is orientated to community / civil society stakeholders rather than duty bearers.

(d) What staffing structure is feasible, given the financial resources and available human resources?

One typical model for legal assistance services involves a series of team, with each team having a supervising national lawyer, senior paralegal staff, several junior paralegals and limited administration support. A team of up to eight is generally considered optimal, providing the supporting paralegals have sufficient experience to work relatively autonomously on routine matters. The teams may be further supported by dedicated outreach / education staff, policy / advocacy staff, and managed overall by a senior national or international lawyer / programme manager.

ICLA’s staffing structure has been established with national staff from a broad range of professional backgrounds. Team members have limited or no prior casework experience, and little or no legal experience prior to commencing work with ICLA. The team size has been too large for one lawyer to supervise effectively, although the second lawyer position was under recruitment at the time of the evaluation. One mitigating factor is that much of the work of the ICLA team has been basic information provision, which is relatively less demanding for supervisors to quality assure. The limitation of a single national lawyer has meant that the programme has needed to strike a balance between the role of the lawyer in supervising and training the ICLA team members, and in providing direct services. In practice, the national lawyer has been constrained by workload issues from providing services which ICLA would likely otherwise have provided.

(e) What opportunities exist for synergies?

The current ICLA structure has been designed around a symbiotic relationship with the shelter programme. There would likely be potential for stronger collaboration with other NRC programmes, such as the education programme. Further synergies should arise, particularly if NRC shifts towards an area based approach to programming.

In addition to internal synergies, NRC and ICLA have established partnerships which could be enhanced. These include civil society partnerships, with CBOs who could work on outreach and CDR, or legal aid NGOs who could expand their legal service delivery, women's rights organisations which could collaborate on issues to do with marriage, early marriage, divorce, inheritance etc. Further partnerships may exist with Government / municipalities (e.g. working on informal settlements), or institutions such as schools (e.g. legal rights awareness) and hospitals (e.g. birth registration).

(f) What external constraints affect programme our programme design?

There are several external factors which have shaped and affected programming design. One factor is that NRC has not sought a stand-alone endorsement for ICLA activities. Donors are also already supporting national legal assistance service providers, which limits donor support and funds for additional entrants. Thirdly, by its nature legal assistance work is sensitive and the Jordanian operating environment is also relatively complex, which creates risks of repercussions for unsuccessful activities.

Perhaps due to these external factors (in addition to the internal motivation of seeking synergies with Shelter), the ICLA programme has focused predominantly on providing additional value to existing NRC shelter clients and to assisting those beneficiaries who approached ICLA to request assistance.

Related to this, ICLA's work has been relatively individualistic in approach – e.g. information on access to essential services has been generally provided to shelter beneficiaries during one on one visits, rather than provided holistically to groups via outreach sessions in community neighbourhood centres or parent teacher associations. Convening larger events would reach a larger group at the same time and may be more efficient. However, ICLA has generally taken a less prominent approach, and where events have been convened they have generally been done in partnership with other organisations.

Recommendation:

1. It is not financially feasible for the relocation shelter option to scale up to meet the existing demand, as the required investment per intervention is quite high (although the impact is correspondingly high). We also note that the relocation option is not appropriate for some beneficiaries (small families, especially poor and vulnerable families, etc.). We recommend that Shelter programming scale up by expanding the range of shelter programme options and expanding the geographic delivery of services, in particular:

- The expansion of the renovation option, to assist beneficiaries who live in moderately substandard accommodation which could be remedied, and where the beneficiaries have a satisfactory relationship with their landlord. This may involve amending the eligibility criteria for the scale of works of the current renovation programme, to provide greater uptake by beneficiaries. The programme could also include issues such as ventilation, mould and moisture prevention which frequently arise due to poor design, crowded spaces and use of heating. Mould has the potential to damage landlords' properties and to affect the health of beneficiaries, so addressing this issue could help both landlords and beneficiaries.
 - Collaboration with WASH and winterisation activities, potentially in return for rent-free periods. Similarly, to the renovation option, the WASH and winterisation activities are upgrading properties free of charge for landlords, and NRC could negotiate in exchange of this assistance a free rent period.
 - Consideration of cash assistance, when the property of the beneficiaries selected is in a decent condition and is providing adequate shelter according to the agreed standards, but the family remains extremely vulnerable due to financial constraints of responding to all households expenses including rent, utilities, household items, food and other, in this case cash for rent might be the appropriate and viable option. It should be noted that this could possibility have an impact on the rental housing market, depending on the volume of cash distributed.
 - Retention of the relocation programme, where beneficiaries live in significantly sub-standard accommodation which could not feasibly be rectified and / or the beneficiaries' relationship with the landlord or co-tenants has deteriorated irretrievably.
 - Collaboration with other actors such as UN-Habitat, to advocate and promote options for small families such as the design and construction of some small sized housing stock.
 - Geographic expansion to new areas, ideally identified and selected in conjunction with stakeholders, and chosen to obtain synergies with NRC's other core competency programming, particularly education.
 - Advocating for additional shelter actors to join the sector (or to re-engage with the sector) as the shelter needs are beyond the capacity of any single INGO to address. NRC could build upon its role in the Shelter Working Group to advocate for a range of shelter responses – e.g. to advocate for the GoJ to provide social housing, with architecture support and urban planning provided by UN Habitat and the international community, etc.
2. We consider that scale up of ICLA services would likely be in several dimensions:
- Reduced general follow up and servicing of Shelter beneficiaries, except where specific ICLA technical competencies are required. This would free up ICLA staff to focus on a broader client pool and a broader range of services.
 - Identify expanded target beneficiary populations, beyond the pool of current shelter beneficiaries. This could be geographically, as NRC expands its services into other areas. However, it is likely that there are extensive numbers of potential beneficiaries in ICLA's current areas of operations who have not been assisted due to ICLA's focus on assisting current Shelter beneficiaries, including those shelter applicants currently on the waiting

list or registry. Jordanians host community could potentially be included as target beneficiaries for some services, which would be consistent with the Government of Jordan's priorities. For example, if NRC provided a tenants' advisory service that gave general tenancy information and advice, this service could be offered equally to Syrians refugees and Jordanians – the service should be quick, simple and relatively cheap to deliver. More comprehensive services could be directed to Syrian refugees, such as legal assistance / representation, which require a greater investment in staff time and expense.

- Expand means of service delivery while noting the sensitivities of legal assistance programming, the consensus view of stakeholders and the evaluation team is that there is now some increased space for ICLA to provide an expanded range of services. This may range from front-line client service delivery in less contentious topic areas, through to expanded 'behind the scenes' work on more contentious topics. Stronger internal case management capacity would be helpful, as would temporary (consultant) policy / research capacity as required (e.g. to analyse the MOI Service Card renewal issues data), and greater capacity to delivered structured training programmes to build partner organisation and potentially host Government duty bearer capacities in HLP issues.
- Basic information and outreach may be more effectively conducted using other means – for example, by conducting community based training on local issues (such as accessing schools, health care, utilities etc.) or by deliberately targeting the participants who could benefit from the information – for example training for female religious leaders on CDR, training for head construction contractors on technical standards and adequate ventilation requirements, training for midwives and public health workers on birth registration, etc. etc.
- Greater attention to traditional ICLA strengths of HLP and civil legal documentation, as described above under Question 2.
- Strategic collaboration with partners – ICLA has commenced some initiatives with partners, ranging from referring clients to legal aid service providers for representation to collaborating with MSF to conduct trainings on birth registration. There may be innovative ways to expand these partnerships – for example, IMC has partnered with a supermarket to package kits for new parents, and it may be feasible to include basic written information on birth registration within this package. Some national legal assistance organisations may be able to assist clients in areas where an international organisation could not – for example, one legal assistance organisation reported that they had been successful in accompanying clients to resolve MOI registration issues on a number of occasions.
- Recruitment of additional experienced and qualified staff as required to strengthen the ICLA team – completed recruitment of the second national lawyer, and the addition of several experienced paralegal staff to strengthen team casework skills and technical knowledge.
- Update of supporting management information systems such as the ICLA database to support staff and supervisors to implement cases and manage team members.

Coverage

Overall: The beneficiaries selected by NRC to receive assistance have been appropriately selected, in accordance with a Vulnerability Assessment tool. However, these beneficiaries are a subset of a larger group of refugees, many of whom are also in need but do not receive assistance from NRC or other service providers. While it will never be possible for one organisation to meet the needs of the entire refugee population, NRC can expand its range of shelter programme options to include lower-cost options which would allow NRC to reach more beneficiaries. ICLA could increase its coverage by focusing less on providing services to shelter beneficiaries and working more with the broader refugee population (and potentially low-income Jordanians and host communities for some services), subject to navigating sensitivities and Government approvals.

6. Are we reaching the right people? (See Annex 2) Sub-question: what vulnerabilities in this context should qualify a person to be selected as a beneficiary?

NRC Shelter and ICLA are targeting Syrian refugees who are living in poverty in urban areas, outside of camps. This pool of potential beneficiaries is large and is in demonstrated need of assistance, due to the hardships associated with protracted displacement and extremely limited earning opportunities in Jordan. NRC appropriately uses a vulnerability assessment tool to prioritise those families most in need of support, and places other eligible households on a waiting list for future assistance.

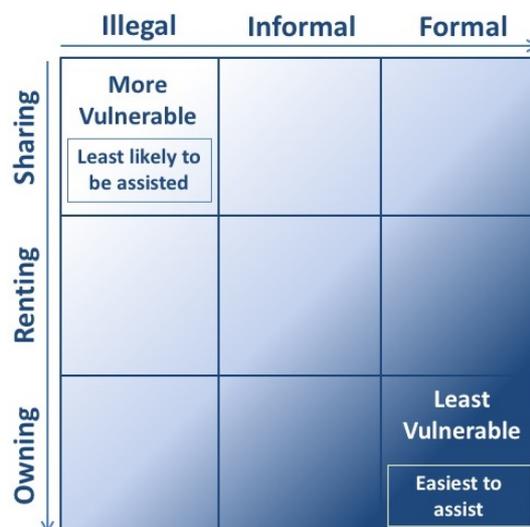
While the Shelter programme does reach vulnerable people, there are several factors which suggest that the programme may not reach the most vulnerable people:

- Proactive vs. reactive beneficiary selection - The shelter programme currently has a long waiting list. To minimise unrealistic expectations, the programme mostly receives new applicants from refugees approaching the service through the drop in centre or helpline and requesting assistance. Extremely vulnerable people may not have access to a mobile phone to call the hotline. They may lack money for transport to visit the drop-in centre, or they may not have valid documentation which permits them to pass roadside police check-points and travel to the drop-in centre in Irbid. The programme is currently exploring the establishment of a drop-in centre at Jerash, which will improve physical access for some people. However, due to their circumstances, it can be very difficult for extremely vulnerable people to access services, and a multi-pronged outreach approach to identify and support these refugees is required.
- NRC quite properly undertakes geographically based matching, to reduce the protection risks associated with relocating people across districts and Governorates. In an area with greater supply of housing NRC may be able to assist many clients, while extremely vulnerable clients may wait longer if there are not available housing units in their area.
- Range of shelter options - NRC currently offers a limited range of shelter options to assist eligible refugees. The main option is to relocate the household to a newly refurbished property. While this suits some households, for other households the option will not be appropriate – for

example, if the family circumstances do not permit the relocation – e.g. a family with a chronically ill member may be vulnerable, but not suitable for relocation away from medical services. NRC has limited housing stock in close proximity to medical services, as these properties would be located in desirable urban areas. Extremely poor families are not likely to have the funds to pay for ongoing expenses associated with relocating into a house, such as monthly utility bills.

- Small families - Due to the limited availability of small sized housing stock (e.g. studio or one bedroom apartments) and the financial efficiencies (i.e., the cost of completing a one bedroom apartment with kitchen and bathroom compared to the cost of completing a three bedroom apartment with kitchen and bathroom), NRC has limited capacity to assist small families. Some small families, such as small female headed households may be among the most vulnerable. For cultural and protection reasons, it is not generally feasible to accommodate these families in a house with other families. For this reason, beneficiaries understand that NRC is generally unable to assist ‘small’ families. This may also lead to families artificially combining (e.g. presenting a colleague’s child as their own) in order to meet NRC eligibility criteria. In July 2015, NRC amended the shelter funding table to provide a greater financial incentive for small property owners to join the programme.

As the ICLA programme predominantly provides services to shelter programme beneficiaries, the constraints listed above which preclude shelter from reaching the most vulnerable people suggest that ICLA similarly may not reach the most vulnerable people, as ICLA has limited capacity to conduct its own outreach. This is partly due to deliberate programmatic design (i.e., a design choice to focus on ‘value-added’ services to Shelter beneficiaries), and partly due to external factors, such as sensitivities in working on legal assistance issues (particularly legal representation) and the authorisation status for stand-alone ICLA activities. ICLA has sought to mitigate some of these issues through cooperative referral partnerships with national legal aid service providers, which has been successful at low volumes. The national legal aid service providers are generalist legal services in nature, and have not developed NRC’s specialisation in areas such as HLP. The legal assistance services would likely be interested in receiving tangible financial support from NRC should referred case-loads grow significantly, to support their human resources capacity to manage the cases.



The diagram above shows that generally the most vulnerable are the hardest to assist. They may lack MOI cards and UNHCR registration, and to economise they might share accommodation with other relatives. It is very difficult for them to proactively reach out for assistance, due to lack of knowledge, fear of repercussions (e.g. being caught by the police at a checkpoint or reported to the police), transport issues, lack of access to mobile phones, etc.

Assisting the most vulnerable is also more expensive as they need greater levels of assistance (e.g. assistance with monthly utility bills) and their capacity to become resilient in a 12 or 18 months period is even less likely than for someone who already has some form of income, even if this income is irregular.

Recommendations:

1. NRC is appropriately targeting vulnerable beneficiaries, who are in need of assistance. However, for the extremely vulnerable beneficiaries, the shelter services offered (predominantly relocation) are not appropriate and are difficult to access. We recommend that NRC develop a broader range of shelter programming options, including shelter options which responds specifically to the need of the most vulnerable,
2. Proactive vs. Reactive beneficiary selection: We recommend to continue receiving requests and assessing needs from refugees approaching NRC directly, through the drop-in centre and helpline. We would also recommend a more proactive beneficiary selection process, carrying out assessments in areas recommended by a broad range of existing local networks of Jordanian and Syrian community leaders and community representatives, through local organisations and CBOs, and through the municipalities. The criteria should be clearly communicated and households who do not comply with the vulnerability criteria should be informed accordingly. This would allow NRC to better target and manage their beneficiary selection process and beneficiary waiting list, whilst targeting the shelter and ICLA assistance to those most in need.
3. ICLA's assistance has been focused predominantly on providing services to shelter beneficiaries. ICLA has managed some of those sensitivities by working in partnership with local legal aid organisations. However, the coverage has remained limited. We recommend that ICLA target a much broader range of beneficiaries, and focus less on providing services to current shelter beneficiaries. As an intermediate step, ICLA has access to a registry of approximately 42,000 Syrian refugees who have applied for Shelter assistance, including approximately 1,000 who have been assessed as eligible. ICLA could provide enhanced services to this registry of refugees, particularly those who have already been assessed as vulnerable. For example, the ICLA team could proactively contact people on this list and offer HLP related assistance at their current property (e.g. information on how to negotiate a formal lease with their landlord to improve their security of tenure), or provide CLD information and counselling, etc.
4. We recommend NRC consider providing some services to vulnerable Jordanians. While some ICLA issues (e.g. legal identity and citizenship) may raise specific issues for refugees, general services such as tenancy advice are relatively cheap and could be provided relatively easily to vulnerable people regardless of their nationality. This would be consistent with the Government's emphasis on providing support to Jordanian communities through resilience programming, although we note that it is a step away from NRC's core displacement focus.
5. We note that many organisations are working with Syrian 'volunteers' (who are paid a modest stipend) to improve their ability to access out of camp communities and provide targeted services. There remain political sensitivities to working with Syrian volunteers – formal work authorisations are limited and Syrian volunteers may potentially be exposed to repercussions as a result of their work, especially if they are working on sensitive topics. Some Syrians also regard other Syrians as spies and are suspicious of cooperation. However, the experience of other

organisations is that working with Syrian volunteers has the potential to improve their service coverage and quality, and we recommend that NRC consider whether there may be some roles which could be appropriate for Syrians – for example, as paralegals to provide legal information, or as renovation teams to undertake small repair projects, such as mould removal, ventilation improvements etc. This could also indirectly provide some livelihood support for a small group of Syrian refugees, in a context where these options are limited.

7. To what extent are the villages and towns selected for the programme the most appropriate geographical areas?

We understand that the areas selected for the programme were initially based on relationships with partners and CBOs, who assisted in outreach and awareness raising and provided advice on potential locations for engagement. It has not so much been based on formal Government processes, such as a Government housing development strategy, municipality master plans (which may not exist), the municipalities' advice on where further housing development is required, nor on a detailed study of where unfinished-housing units are available and where Syrian refugees are living.

The decision to develop the programme in some of the villages and towns seems to be somewhat pragmatic. A significant determining factor seems to have been whether landlords in the area have been interested (rather than perhaps, whether Syrian refugees were interested in living in those areas). Over the project implementation period, the programme has improved the ways in which landlords are identified and selected, and has stopped enrolling landlords in areas where NRC cannot match and place beneficiaries.

The more recent population growth appears to have been in more densely populated areas of cities like Irbid, as people seek informal work opportunities and proximity to services such as schools, hospitals, town electricity, water and sewage supplies. There are limited suitable properties in city centres for NRC to rehabilitate, although these properties are in demand by beneficiaries.

NRC should consider greater engagement with the authorities (i.e., municipalities) in the selection of project areas. In at least one peri-urban location in Jerash, NRC has rehabilitated a large number of houses in one street, and placed Syrian refugees in these houses. This significant influx of Syrian refugees will change the nature of the local community, and the simultaneous additional demand on services including electricity, water and sewage has the potential to overload these services. While it is more efficient for NRC to work intensively in selected areas, this can have potential unforeseen negative impacts.

A topic repeatedly raised by both Jordanians and Syrians during the evaluation was the cultural similarities and differences between Jordanians and Syrians. Many respondents particularly mentioned conflicts over use of rooftops and balconies. Syrians regarded using these spaces as a way of relaxing with family and friends, while Jordanians were concerned over noise issues especially late at night, and also by the invasion of privacy as the tenants overlooked their property. Some beneficiaries reported that their landlords had barred them from using the balconies and rooftop, while others reported that they had had to put cardboard over their house windows and keep them closed at all times to avoid arguments with the neighbours that they were watching the neighbour's house and yard. Lifestyle and

cultural differences should be taken into account when selecting areas and properties, as some neighbourhoods will be more conservative than others, and some housing designs will overlook their neighbours more than others.

It was mentioned by one UN stakeholder that NRC urban shelter programme could potentially contribute to the development of informal settlements. They explained that this is due to the general lack of coordination with authorities, the programme focusing on individual apartment blocks rather than using a neighbourhood approach with an urban lens, the fact in some streets have had significantly high number of relocations by NRC which increases the potential of “ghettoization” of certain neighbourhoods. This suggestion has not been verified but such development should be taken into consideration and dealt with sensitivity. The evaluators have previously noted the risks of working heavily in an unstructured way in communities, based on large numbers of rehabilitated properties in one street and the potential social dynamics which could flow from this.

Undertaking area-based programming could potentially provide a more coherent and evidence based approach to area selection, and also improve synergies across NRC core competencies. Coordination with other stakeholders, including UNHCR, NGOs and CBOs is essential for geographical assessments and community based development.

Recommendations:

1. We recommend that the programme approach area selection in a more deliberate and structured way, including consultations with stakeholders such as municipalities. An area-based approach to programming across the office would have potential benefits for increasing synergies across programme core competencies, and allow for more thorough (and holistic) assessments. The selection of housing areas has reportedly improved since earlier in the programme, and we note that more deliberate area selection should take into account the availability of services (water, sewerage, electricity); distance to services (shops, schools, health, transport), cost of transport, access to informal employment opportunities, and likely suitability of the area and the housing stock for the beneficiary profile already registered on the waiting list.

Efficiency / effectiveness

Overall, the programme is considered to be efficient and effective. We note that the programme has had a heavy reliance on relocation as the predominant shelter option, and that this option is the most capital intensive (while also providing the most comprehensive return). We consider that introducing a broader range of shelter programming options would help the programme to be more comprehensive and better respond with targeted assistance to specific shelter needs.

The programme requires further investment in IT tools to adequately meet the information management needs of both the shelter and ICLA teams.

8. What is the added value of the integration of the ICLA component of the programme compared to a traditional stand-alone shelter programme?

A heavy reliance on relocation as the predominant shelter option requires an extensive investment in support to mitigate protection risks (e.g. through thorough intake assessments, monitoring the living situation during the lease etc.) which NRC has put into place, however this involves both a financial cost (e.g. staff costs associated with support and follow-up) and an opportunity cost (what alternative activities could the staff have been implementing in this time?).

The shelter programme has very much benefited from the ICLA component compared to a standalone shelter programme. Some of the benefits include:

- Contract design between NRC and the landlord for the construction works;
- Lease agreement between the tenant and landlord providing and occupancy free of charge for a defined period of time (12-18 months)
- Information outreach on legal documentation
- Follow-up activities to ensure the lease is progressing smoothly, and provide information on access to basic services.
- Feedback and complaint mechanism
- Collaborative dispute resolution in landlord / beneficiary disputes, etc.

Some of the activities described above would usually be carried out by the shelter team itself, such as follow-up activities and feedback mechanism. Shelter has benefited from a broader number of staff and “social workers” to deal with their beneficiaries, leaving the shelter team to focus more on property selection, property completion and property matching.

Shelter, HLP and ICLA are inherently linked and the shelter team has very much benefited from that available expertise. Through the integrated approach of Shelter and ICLA, the programme aims to achieve *security of tenure*, which means ensuring that occupants possess a degree of security of tenure which guarantees legal protection against forced evictions, harassment, and other threats²¹.

This is often dealt with by integrating a HLP expert within the shelter programme. In the case of NRC, the

²¹ SWG – technical standards for HLP

expertise is available in-house through ICLA, thus making use of the staff, integrating the programme structure so that shelter beneficiaries can also benefit from HLP advice is one of the main strengths of the programme. Some of the HLP activities required according to the Shelter Sector Working group include: ensuring formal lease agreements, protection from exploitative treatment by landlords, protection from unlawful evictions, and promoting harmonious relationships between refugees and host communities. Some of these activities are being implemented by ICLA with various degrees of success. Notable constraints have included the focus on providing services to shelter beneficiaries, which limits the pool of potential beneficiaries considerably, and the lack of a stand-alone accreditation which would authorise ICLA to engage more broadly – e.g. on collaborative dispute resolution between refugees and host communities.

The ICLA team has likewise benefited from the relationship with the Shelter team. Without a stand-alone authorisation to encourage wider community engagement, the integration of shelter and ICLA has provided ICLA with ready access to a beneficiary pool, who are engaged in activities that ICLA is designed to support (e.g. improved tenancy conditions leading to improved security of tenure).

However, the integration of Shelter and ICLA has come at a cost to ICLA programming. As the ICLA team has focused predominantly on servicing shelter beneficiaries, the programme has not yet grown to service other beneficiaries, or to increase the scope of the services which are provided. Some of this may be due to limited protection space to implement ICLA programming. However, in part it appears that a large proportion of ICLA resources are committed to relatively routine follow up of Shelter beneficiaries, who may only require basic information. This does not make the most efficient use of ICLA's specialist technical expertise.

Recommendation:

1. While noting the advantages of the close integration of Shelter and ICLA, we recommend that the shelter field staff should have a responsibility in carrying out the beneficiary follow-up for feedback purposes and should be joined by an ICLA staff to provide ICLA services. Where there are specific issues, the shelter field staff should request for technical support from the different programmes – i.e. whether the engineering team support is required to address a property defect, or the ICLA team is needed to provide specialise collaborative dispute resolution or lease re-negotiation support. This would ensure that technical concerns, shelter or ICLA related, which arise during the feedback and follow-up period to be addressed.

Additionally, to ensure that defects and shelter issues are addressed in a professional manner, we would recommend that the contract with the landlord includes the following:

- Standard contract template between landlord and contractor (including general contract conditions, specifications for quality of works, workmanship, materials, and minim standards, and defect liability period²² for up to 6 months with a 10% retention for the contractor to remedy defects following the completion of the works)

²² Defects do not include normal tear and wear.

- Guidance on how this contract should be administered, and how the defect and liability period should be managed.
- A joint PDM should be undertaken by NRC shelter technical staff and the landlord to ensure defects are being remedied, ensuring that the landlord is following-up on his responsibility to follow-up the defect claims with the contractor.

We believe this approach would free the ICLA team from responding to some of the shelter and technical issues and would engage the shelter technical team to engage more comprehensively with their intervention.

2. The ICLA team should progressively aim to expand its scope of target beneficiaries and the range of services provided, subject to obtaining suitable authorisations to do so (as outlined elsewhere in this evaluation).
3. Shelter and ICLA staff supporting beneficiaries in a casework capacity should receive adequate professional training and supervision to avoid engaging in harmful 'rescuing' behaviours, where they take on responsibility for the beneficiary's situation. This can be psychologically damaging for both the staff and the beneficiary. Less experienced staff should be required to escalate cases they cannot manage to senior staff. NRC should ensure that it has a cadre of staff with a professional casework background (e.g. in social work, paralegal work etc.) to professionally and competently manage more complex and difficult cases, or to further refer them to external services as appropriate.

9. How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve synergy between NRC programmes?

We present the following issues for consideration. To avoid duplication, where these issues are already discussed elsewhere in the evaluation report they are not expounded in full here.

- The close collaboration between Shelter and ICLA has had benefits for both programmes, as outlined elsewhere. It has perhaps also stifled the development of ICLA into a more comprehensive, stand-alone programme (i.e., a more traditional NRC ICLA programme).
- The attendance of ICLA staff at assessments conducted by the shelter team provide an opportunity for ICLA to provide information and counselling on site, as well as sharing of expertise across the teams.
- NRC has invested extensively in staff development, particularly in staff exchanges and shadowing during the period where external activities have been placed on hold, due to the Government suspension of shelter activities. There has also been an extensive focus on refining and documenting procedures during this period.
- We consider that area based programming approaches (including site selection, community approaches to information dissemination and collaborative dispute resolution etc.) has potential to encourage greater synergies across NRC programmes.
- Access to other NRC services, such as WASH assistance etc., has been creatively used as a bargaining point to help provide additional assistance to landlords and tenants, in return for a further rent free or reduced rent period.

- We consider it would be more appropriate for the social team to take on responsibilities for routine beneficiary follow up, such as orientation, moving in, post-moving in follow up etc. It would be more efficient if specialist expertise were brought in as required – e.g. specialised ICLA collaborative dispute resolution expertise. This would allow ICLA resources to be redeployed into more technical areas. Note that ICLA would require additional technical staff to allow them to competently expand into new work areas without overloading the existing supervisory technical staff (i.e., the 1-2 lawyers, and the project officers with a professional casework background). The Shelter team could be trained to at least identify basic HLP issues, and ideally to also address basic HLP issues.

The Feedback and Accountability mechanism is reportedly perceived by Shelter staff as an ICLA activity, which can create structural conflict between the three units, especially since the subject matter of the complaints is largely shelter related. The Feedback and Accountability line recorded 483 contacts from June 2014 – August 2015, of which:

192 (40%) – following up shelter assessment decision

109 (23%) – requesting the assignment of a new property

88 (18%) – following up (shelter) assessment visit.

Feedback and Accountability is an important role, and should ideally be undertaken by a senior and independent staff member, reporting at a senior level (such as to the Country Office Senior Management Team). We support the steps the Country Office has taken to place the role officially under the Monitoring and Evaluation team, which we hope would be perceived as more independent. The implementation of this should be monitored, in case further adjustments are required.

- It is important to ensure that programme staff do not fall into a production line approach, focusing on bringing properties online and ensuring that they are fully occupied. There is a risk that shelter programmes can become property-centric, rather than beneficiary centred. Intensive processes can cause delays in moving files from one stage to the next (e.g. the current transition from Shelter to ICLA after move-in), and rigid systems do not cope well with exceptional cases.
- Information management – the current system of databases are unwieldy and poorly suited for purpose. Separate database systems are maintained for the Shelter and ICLA programme, requiring the manual re-entry of data. A functional case management system should operate efficiently at four levels:
 - Staff use – easy access for staff to enter and update files, reminders for the follow up activities due that day, flagging of overdue activities
 - Supervisor use – show staff activities, allow supervisors to enter and review file status and activities, flag overdue activities, identify staff workloads, allow supervisors to allocate (or reallocate) files to another staff member.
 - Management use – preparation of reports for external audiences, such as donors. Tracking of key metrics through dashboards, such as open cases, number of unoccupied premises, number of overdue constructions, etc.
 - Advocacy use – allow users to flag files which they believe would make good case studies (and explain why), allow analysis to identify and analyse systemic issues (such as problems experienced by beneficiaries in updating their MOI service card registration, beneficiaries asked to pay rent by their landlords etc.).

There are reportedly a limited number of staff (1-2) who can fully understand and use the database systems. This creates organisational risk for NRC in the event that those staff become sick, or unexpectedly leave the organisation.

We note that globally, NRC HQ is taking steps to identify software solutions which would offer better support to NRC's shelter and ICLA programmes, and we endorse this approach.

10. How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve value for money?

We consider that overall, the combined Shelter / ICLA programme has provided good value for money. The primary intervention of relocation is a more capital intensive approach, however there is also a medium term impact which continues after the beneficiary has left the property. The programme increases the housing stock, injects money into the Jordanian community, through landlords, contractors, labourers, aid worker staff, etc. According to the DFID Value For Money report “the project was seen positively, with the single most cited reason cited being the investment and job creation in local communities”.

Cost Analysis of relocation project verses cash for rent

All figures were extracted from NRC internal analysis document on funding shelter relocation project, from July 2015

	Cost 1 unit	Cost 2 unit	Cost 3 unit	Cost 4 unit
Relocation with 18 months free rent	1,400	2,800	4,200	5,600
Relocation with 12 months free rent	1,000	2,000	3,000	4,000
Revised funding from July 2015 - relocation with 18 months free rent	2,000	3,000	3,800	4,400
Average Rent* in Urban /18months	2,034	2,988	3,546	3,978
Average Rent* Semi-urban /12months	1,356	1,512	1,800	2,004
New home (65m2)**	13,500			

* Of properties with no reported shelter conditions issues, based on social team assessments data.

** based on the cost estimate provided by UN-habitat between 12,000-15,000JD for 65m2

Notably, the changes in funding the relocation model are now better aligned with the required Bills of Quantity and with average rental prices. It also provides increased incentives for owners of small properties (increase from 1,400 JD to 2,000 JDs) and reduced incentives for larger properties (reduction from 5,600 JD to 4,400 JDs for 18 months' rent free).

The close relationship between the programmes has also led Shelter to benefit from ICLA's expertise, and ICLA to benefit from access to an available beneficiary pool.

We do recommend that further adjustments be made, to improve the programme's relevance and impact. Some of these recommendations would require addition expenses – for example, it is more

costly for programmes to seek out and deliberately target the most vulnerable beneficiaries than to wait for other beneficiaries to approach them.

We present the following issues for consideration. To avoid duplication, where these issues are already discussed elsewhere in the evaluation report they are not expounded in full here.

- We recommend the introduction of a broader range of shelter options (as discussed elsewhere), to help facilitate the matching of the assistance provided to the beneficiary's needs. In particular, we recommend the expansion of a range of lower-cost initiatives (e.g. repairs and cash assistance), to assist clients who do not need to be relocated.
- Who are the programme targeting – if the programmes aim to target the most vulnerable beneficiaries, these beneficiaries will likely be harder to identify, to reach and to assist, due to their more comprehensive needs.
- Review of the lease period for relocation – the lease benefits for the beneficiary vary, depending upon the investment provided by NRC into the property.

Intervention	Investment limit	Minimum standards
Increased housing units	1,000 JD	Rent-free agreement for 12 months, secure tenure, no eviction (prior to July 2015)
	1,400 JD	Rent-free agreement for 18 months, secure tenure, no eviction (prior to July 2015)
	2,000 JD	Rent-free agreement for 18 months, secure tenure, no eviction (after July 2015)
Upgrading housing units	<500 JD	Negotiated secure lease, no increase in rent, no eviction
	500-900 JD	Negotiated reduction in rent, secure tenure, no eviction
	900-1,200 JD	Security of tenure for at least one year, ideally 18 months; Negotiated reduction in rent ($\geq 20\%$); No eviction

According to UNHCR, the average monthly rent per property (which likely includes several housing units) in 2014 is 125JD and according to NRC 165JD / Month.

We note that NRC now has a significant queue of landlords applying to be part of the programme (2,908 landlords as of August 2015). If NRC does reduce the prominence of relocation as the primary shelter option, it is likely to need fewer houses. It may be possible for NRC to explore extending the lease period for the same investment (e.g. offer a lease of 2 years for 1,400-2,000 JOD investment), on the basis that some landlords will no longer be willing to participate, but that sufficient landlords may remain willing to participate to meet NRC's lower requirements.

- Waiting list management – we understand that the main work tasks of the drop-in centre and telephone hotline are to register new shelter applicants, and to provide information to beneficiaries on the status of their requests for assistance.

We understand that the programme currently has a long queue of landlords and a long queue of beneficiaries, such that the programme cannot reasonably expect to meet the demands of either the landlords or the beneficiaries. As of 31st August 2015, 42,263 Syrian refugees have

registered with the program and are waiting for shelter assistance (of which 1,000 families are eligible for the project and on the waiting list) and a total of 2,908 Jordanian property owners have requested NRC support to finalise their unfinished properties and remain on the project's waiting list.

It is questionable whether the programme should continue to invest resources into receiving and assessing new enrolments, when the current enrolments are unlikely to be met in the foreseeable future. We would understand that exceptions could be made for emergency cases, but in general it appears that this approach will raise expectations which are unlikely to be fulfilled. Resources could be invested in focusing on targeted assessments to identify beneficiaries most likely to benefit from NRC's expanded range of shelter options, and also in re-assessing beneficiaries who have remained on the waiting list for over one year, as their situation could well have changed.

We were also advised that NRC does not as a matter of policy advise beneficiaries that their applications have been unsuccessful and they are not likely to receive assistance from NRC – for example, if they have scored moderately on the VAF and they live in an area which high beneficiary demand and low housing availability. We understand that this approach has been adopted partly to preserve the credibility of the VAF process (to avoid release of information that would help people to 'game' the process) and partly because programme staff adopted the view that 'even if we cant assist the client now, maybe in the future we can assist the client with another programme.'

The consequences of this policy are that some beneficiaries approach the drop-in centre on a regular (weekly or monthly) basis to follow up on their request for assistance. This costs the beneficiary money for transport, in addition to their time, in addition to risks of police detention for some beneficiaries. Where there are realistic prospects for assistance in the short term, this could perhaps be justified – although other measures to keep beneficiaries informed would be better. However, where there are no realistic prospects for assistance in the short to medium term, from a do no harm perspective the clients should be informed of this, rather than continuing in an unfounded hope that they could receive assistance on their next visit. This only creates frustrations for the beneficiary, and creates unnecessary work for the drop-in centre. This policy should be urgently reviewed.

- Construction management – we note that construction management has improved over time, with more attention paid to supporting contracts, identifying and expediting construction projects which were running late. New procedures have recently been put in place to ensure works are completed within the agreed timeframe. Efforts are also in place to help property owners: contact lists of local labourers shared, regular follow-up and technical guidance by NRC engineers. For example:

Month (2014)	# of contracts signed	Average # of days to complete construction works
January	85	67.9
April	67	62.5
July	104	60.4
October	111	54.6

Within the programme team, there was some feeling that NRC should sue landlords who delayed construction or who accepted NRC funding but sought to evict tenants. We would anticipate that NRC should be able to satisfactorily negotiate with landlords who have delayed construction. This requires considerable effort, but will probably be more effective and cost-effective than legal proceedings. NRC could ideally strengthen its community networks and use community pressure to help encourage recalcitrant landlords.

11. To what extent does the response meet the adequate shelter needs, as intended, of the families it serves?

As of June 2015, 83% of registered Syrian refugees live in urban areas²³, and the vast majority are struggling to secure adequate shelter. As one of the most pressing needs shelter is also the source of tensions between refugees and the host community.

The response does generally meet or exceed technical standards and provide more than adequate shelter. However the response is only available to a relatively limited number of beneficiaries and is only available for a limited period. Due to external factors (such as limited access to legal livelihoods), the assistance is beneficial during the period of rent-free housing, but does not significantly last beyond that period.

The table below aims at comparing the Shelter Working Group standard on “Shelter adequacy” with NRC shelter response.

Shelter Working Group Standard for shelter adequacy ²⁴	NRC shelter response
Security of tenure: housing is not adequate if its	NRC shelter programme ensures legal protection

²³ In Search of a home, NRC June 2015

²⁴ Shelter Working Group Technical Guidelines: Increased Awareness about Housing Land & Property Rights March 2015

<p>occupants do not possess a degree of security of tenure which guarantees legal protection against forced evictions, harassment, and other threats.</p>	<p>during the course of the programme. The objective of having this condition maintained once the lease is terminated has not materialised mainly because the assumptions were not verified.</p>
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<p>Availability of services, materials, facilities and infrastructure: housing is not adequate if its occupants do not have safe drinking water, adequate sanitation, and energy for cooking, heating, lighting, food storage, or refuse disposal.</p>	<p>These standards have generally been met through the technical implementation team, up-grading properties to an agreed minimum standard.</p>
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<p>Affordability: housing is not adequate if its cost threatens or compromises the occupants' enjoyment of other human rights.</p>	<p>The property is provided free of cost, during the period of the assistance.</p>
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<p>Habitability: housing is not adequate if it does not guarantee physical safety or provide adequate space, as well as protection against the cold, damp, heat, rain, wind, other threats to health, and structural hazards.</p>	<p>Matching process improved, but could still be further improved. Some cases of people with special needs living on 3rd floor, no grills on windows, general security issues and safety issues for children in properties without barriers.</p>
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<p>Accessibility: housing is not adequate if the specific needs of disadvantaged and marginalized groups are not taken into account.</p>	<p>See point above</p>
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<p>Location: housing is not adequate if it is cut off from employment opportunities, health-care services, schools, childcare centres and other social facilities, or if located in polluted or dangerous areas.</p>	<p>Matching process improved, and the selection of properties has been improved to accept more properties which are more suitable for beneficiary needs.</p> <p>Relocations have been reduced, particularly relocations across Governorates and districts.</p> <p>The programme is developing an increased emphasis on renovations to avoid relocations.</p>
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<p>Cultural adequacy: housing is not adequate if it does not respect and take into account the expression of cultural identity.</p>	<p>Some families have artificially combined in order to gain access to NRC assistance, which is not culturally appropriate and may cause issues within the family and with the host community.</p> <p>There are ongoing issues concerning different cultural uses of the property – e.g. guest visits, use of balconies and rooftops, and associated noise and privacy issues.</p> <p>Standard of the property could be revised in consultation with the host and hosted community.</p>
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We appreciate that managing the end of lease is very difficult for all parties – for the landlord, who would like the tenants to leave if they cannot pay to extend the lease; for the beneficiaries, who may have limited money and no suitable shelter to move to, and for NRC who brokered the original lease arrangement.

We note that many beneficiaries may not wish to think about what will happen in the future, and there is some expectation that NRC will assist ‘at the last minute’. In this context, it is challenging to support beneficiaries to make proactive arrangements for the end of the lease.

“NRC were helping us but suddenly stopped. We knew that they were going to stop but it was still sudden and we had no way to prepare and nothing that we could do about it. NRC should consider helping people whose leases are coming to an end. All of our savings have run out because of the long crisis. We’ve had to take loans from friends and relatives.”²⁵

We understand that NRC has been flexible and creative in managing the end of lease arrangements, particularly for vulnerable clients. In some cases, it has been possible to negotiate for additional assistance from NRC in return for extended rent assistance – for example, for WASH assistance to be provided if the beneficiary can remain in the property. In rare situations, beneficiaries have been relocated to vacant houses with short periods remaining on their lease, which are otherwise difficult for NRC to fill.

Recommendations:

1. We suggest reviewing technical standards for shelter with communities where the shelters will be finalised. For example, reviewing the size and occupation density of the properties, security fixtures such as window grills etc.
2. We note there are extensive demands for livelihood support, as Syrian refugees face legal barriers in accessing formal employment opportunities. It may not be possible for NRC to directly offer livelihood support. However, it may be possible for NRC to collaborate with other organisations to advocate for the assistance to be provided. Potential types of assistance could include micro-finance options, small business incubators, etc. Some respondents suggested that NRC could renovate properties for the purposes of livelihoods rather than shelter – for example, renovate a shop front premise that could be used to sell handicrafts. Other respondents suggested that NRC could engage Syrian ‘volunteers’ to provide training on household financial management. They saw it as important that this training come from people who the beneficiaries could identify with, so the training wouldn’t be perceived as judgemental – many Syrian refugee families likely do an exceptionally good job of managing expenses on a very modest income. Credit and debt management were not seen as a significant issue in focus groups, as most debts were owed to relatives and friends rather than commercial providers.

12. To what extent does the response meet Syrians’ needs for information and counselling with respect to accessing rights and services?

Please note that much of the discussion under Q2 about the extent does the programme contribute to Syrian refugees’ awareness and ability to access their rights is also relevant to this discussion. To avoid repetition, these points are not repeated under this question.

²⁵ Focus group discussion 30 August 2015

We would like to note what we see as being some of the barriers to the achievement and recognition of rights for Syrian refugees; i.e.:

- Access to information – Syrian refugees who are unaware of rules can fail to act, in a way which exposes them to judicial consequences or fines. For example, Syrians may be able to informally register a birth at a later date by paying a bribe to an official, whereas the Jordanian process is much stricter with significant fines for late birth registrations. ICLA information and counselling can help provide advice where Syrian laws and practices vary with Jordanian practices – which includes issues from utility bills through to registration of births and deaths with the Civil Status Department.
- Lack of supporting documentation – Syrian refugees may understand the administrative or legal processes, but may not have the supporting documentation required to evidence their claim. Many refugees have not had identity documents returned to them after they were confiscated by the Government, including passports to evidence identity and family books to evidence marriage and family ties. Refugees may have fled Syria without bringing marriage certificates, or the documentation may have been destroyed in bombing and the refugee has no realistic possibility to approach the Government for replacement documents. NRC provides some casework in these more complicated cases, and also refers beneficiaries to other legal aid actors for further assistance.
- Cost of procedure – costs can be a significant deterrent which prevents refugees upholding their rights. Outside of GoJ amnesty periods, the fine to register an informal marriage is 1,000 JDs. The process also requires witness to appear (e.g. the sheikh who solemnized the wedding and wedding witnesses), who will have travel expenses (assuming they are able to travel). The courts will also require filing fees and multiple appearances by the parties (an estimated 5 appearances), which each cost time and money, even if a lawyer is working on a pro-bono basis. NRC's assistance does not overcome these cost barriers.
- Fear of Government agencies – many Syrian refugees have a distrust of Government services, particularly security services such as the police and Ministry of Interior. Re-registration of MOI Service cards requires an application at the Police Station. Approvals for foreigners (i.e. Syrian refugees) to marry in Jordan require the authorisation of the Ministry of Interior in Amman. NRC's information, counselling and legal assistance can provide some support and reassurance to people going through these processes, particularly by explaining how the processes should operate and also by referring to another service for accompaniment where required. However, some refugees, such as people with irregular documentation, do face significant risks of arrest and detention if they come to the attention of police, even if the reported numbers of forced returns to camps and forced returns to Syria are reducing.
- Inconsistent application of Government policies and regulations – it was widely reported that Government procedures would be implemented differently in different locations. Some police stations and judges have a reputation for being more strict in their application of the rules, while others are seen as more lenient. Some schools were requiring families to hold the renewed MOI Service Card before they could re-enrol, while other schools agreed to accept the old cards. This creates a potentially confusing environment for refugees, but also an environment which they may be able to pursue to their own advantage.

The programme provides an exceptionally high level of information, counselling, legal counselling and legal assistance to those beneficiaries which it assists. However, the pool of beneficiaries that the ICLA programme assists is a relatively limited subset of the overall vulnerable beneficiary population, as ICLA focuses predominantly on servicing Shelter beneficiaries. The range of services which can be provided

has also be constrained – in particular, focusing more on information services, with limited legal assistance and representation provided through partner organisations.

“Overall, the project was good and the staff were lovely and helpful and we thank NRC for the project. NRC were coming to follow up continuously while we stayed in the house, maybe every month. It was a bit helpful to have them visit and it’s nice to know that they cared and came to visit. They could phone more than they come to visit, we don’t need to see them all the time... We had no problems during the visit that they needed to help us with.”²⁶

“They gave information about the water connection, checking on the bills to see whether they are high or not high, saying it can be checked if the bill didn’t match the consumption, checking if there are problems with the neighbours or landlord or some defect with the house. During the snow storm they came to check if everything was ok or anything broke. They followed up and they also helped us with the winterization grant of JD 240.”²⁷

As described elsewhere, there are historical and political reasons why the ICLA programme has focused predominantly on providing assistance to Shelter beneficiaries. Based on NRC’s experience in Lebanon, closer collaboration between the two competencies was recommended. At the same time, ICLA did not have an authorisation to deliver a stand-alone programme, and did not appear to have support or encouragement from external stakeholders to undertake legal assistance programming in urban areas.

These factors have likely limited the development of ICLA programming to date – ICLA has been relatively cautious, quite justifiably, in the way that it has implemented external activities. In general, these activities have been implemented under the auspices of another organisation, which requires greater collaboration and management to implement activities.

As the ICLA programme focuses on shelter beneficiaries, it is likely that some of the most vulnerable beneficiaries are not assisted, as they do not fit the shelter profile. For example, ICLA is targeting HLP support to people in NRC shelter properties, rather than people in informal settlements. ICLA could traditionally assist beneficiaries with civil and legal documentation issues, but much of ICLA’s focus has been on providing information to access essential services including cash assistance, health and education. Shelter beneficiaries tend to have larger families, as the shelter programme cannot effectively place smaller families. Small families (such as small female headed households) may be extremely vulnerable, but these families are more difficult for ICLA to access through Shelter.

ICLA’s legal assistance is managed by one national lawyer, with a second position under recruitment at the time of the evaluation. There are opportunities to deliberately and significantly increase the scope of ICLA activities and the range of targeted beneficiaries. This would require additional human resources of lawyers and experienced paralegals / caseworkers, and additional collaboration with local legal aid service providers. It would also require further professional development of ICLA team members who have been following up shelter cases, and may not have yet developed the full range of ICLA expertise in HLP and civil legal documentation. It would further require additional investment in a functional case management database.

²⁶ Focus group participant, tenant 30 August 2015

²⁷ Focus group participant, former tenant 31 August 2015

We understand that there is a pool of Syrian lawyers that the programme has had some engagement with. It may be possible to collaborate with these lawyers for specific tasks – e.g. to gain a better understanding of HLP issues in Syria, and to help with outreach and training sessions.

One very topical issue during the evaluation was the issue of re-registration of Syrian refugees with the GoJ that results in the Syrians' being provided with an individual Ministry of Interior service card. Many Syrian refugees found this process to be extremely challenging, especially for people with limited financial resources available, and also for Syrians with irregular documents (such as people who left outside the formal bail out process).

"I have the old MOI card. The Government requests the passport for the renewal but they already took the passport to get the original card and they haven't returned the documents to us. We know the process and we tried to work with the process but I'm not able to get the documents back. I have a child who will be enrolled in school next year but they can't be registered until the new cards come." ²⁸

Other focus group participants raised gender issues relating to the MOI process.

"I got the MOI cards for half the family and not for the other half. Each card costs JD 40 with the medical check-up, so I can only afford to get it for some of my family, but for the rest of the family they are in process. We did the men first because we move around more. The wife spends more time in the house so they don't have as much risk to get caught at a checkpoint. If the police catch someone they will call the family and return the whole family into the camp. Sometimes for the young men they deport them to Syria, sometimes return to the camp. I still need to get the cards for my wife and 2 daughters." ²⁹

Many focus group participants raised issues relating to vulnerability to detention by police or exploitation by employers:

"It is not very safe for people to work here due to the permits. Someone made me work for 6 weeks and didn't pay me a single JD but threatened that he would go to the police and report me if I did not complete the construction work." ³⁰

In relation to CLD issues, we note the potentially complex inter-relationships, which can easily lead to inter-generational disadvantage. In a hypothetical example, a woman may marry early in Syria, in an informal marriage before a Sheikh. In Jordan, there is a process to apply to the Shari'a court for a marriage ratification certificate, but even if the 1000 JD fine is waived, the process is long, expensive, complicated and may not be granted since the marriage took place early. As she has no marriage certificate, she faces difficulties in registering the children, and may be charged a fine for delaying registration, or may be unable to register the births without the marriage ratification certificate required by the Civil Status Department.

²⁸ Focus group participant, 30 August 2015

²⁹ Focus group participant, 30 August 2015

³⁰ Focus group participant, 31 August 2015

As her children do not have birth certificates, they cannot access UNHCR or GoJ services – including health and education. This creates further disadvantage, as the children are excluded from education, exposed to illnesses, and the family must pay higher charges to obtain medical treatments from pharmacies rather than Government subsidised clinics. The children’s right to return to Syria may be jeopardised, as they have no legal identity and they risk statelessness, particularly if the father does not recognise the child or dies and is unable to recognise the child.³¹

Without identity papers, the children have limited opportunities. The ability of the family to resettle in a third country as a family is jeopardised. Over time, the daughters are likely at risk of early marriage, due to economic and social reasons. However, if their marriage takes place early, and they do not have legal identity papers, their ability to formalise the marriage and obtain a marriage certificate is also in jeopardy.

Recommendations:

- As discussed elsewhere, we recommend a progressive ‘de-linking’ of ICLA and Shelter, with Shelter staff taking over responsibility for routine follow up of shelter beneficiaries, and ICLA providing targeted assistance as required.
- As discussed elsewhere, we recommend the development of a broader range of ICLA service delivery measures (including increased legal case management capacity) and a strengthened focus on other areas of ICLA’s global expertise, including the land and property elements of HLP and CLD.
- Subject to obtaining appropriate permissions (or identifying other low risks methods of working, such as through partners), we recommend the progressive expansion of ICLA’s targeted beneficiary pool, with a particular focus on aiming to reach more vulnerable people.

Impact

13. What key consequences do beneficiaries feel they have obtained from the programme (positive and negative), disaggregated by male and female-headed households?

Both Jordanian landlords and Syrian refugees have benefited from the programme during the timeframe of the assistance. On one hand, the Jordanian received access to grants, in a context where bank mortgages are not common, and most people are in debt to relatives and friends, or (to a lesser extent) informal lenders. These grants allowed Jordanian landlords to complete unfinished properties which would on average have taken them an additional 1.8 years.³² While most focus group participants reported that the assistance allowed them to bring forward the completion of the property, a significant proportion of landlords stated that they would not have been able to finish the property at all without the assistance from NRC.

Additionally, Syrian refugees received access to a rent-free property complying with minimum standards of safety, adequacy and appropriateness for a period of 12 to 18 months. This has allowed them to gain

³¹ Syria has safeguards to prevent stateless of children born in Syrian to Syrian women whose partner does not recognise the child, but the situation of children born in other countries would be more complicated. Source: Background note on Gender Equality, Nationality Laws and Statelessness page 4.

³² Source:

independence and dignity for this period of time, and generally to have peaceful enjoyment of the property without fear of eviction – excluding a small proportion of cases where the relationship between the tenant and landlord or neighbours broke down irretrievably. The rent-free property has enabled the beneficiaries to spend money in other ways – paying medical expenses, school expenses, and repaying debts.

During the period of the tenancy, the tenants were also supported by ICLA team to formalise their status, gain access to services and resolve arising disputes.

“With the new NRC house, I can now afford to pay 25 JD each month for my children to take the transport to go to a good school where it’s safe and good – the old school had fights and bullying.”³³

	Male tenants	Female tenants (and female tenants with special needs)
Tenants Positive consequences and feedback	<ul style="list-style-type: none"> • They followed up, and they helped us with information, and to get access to the winterisation grant. • NRC saves us from the burden of rent • We were able to spend the rent money on medical and school expenses and repaying debts 	<ul style="list-style-type: none"> • Not paying rent, provides female beneficiaries with a sense of freedom, independence and dignity. They now have the ability to pay their bills, their children back into school, and spend their small income on basic household items, that they could not afford before. • The improved matching process, allowed some beneficiaries to reject their property because it did not fit their needs, and later they were offered a more suitable property. • Positive relationship with the landlord allowed them to negotiate a lease agreement with a reasonable rent, and allowing them to stay. • ICLA information was very useful for example some stated that they did not know that they needed a marriage certificate for birth registration. • NRC staff were very supportive, friendly and provided good service.
Tenants Negatives consequences and feedback	<ul style="list-style-type: none"> • If NRC pays cash for rent for existing houses it is easier for NRC and landlords and tenants. it would be cheaper for NRC and easier for us since we don’t have to move. • With cash for rent, we would be able to stay where we want. The prices are not too high now. • There should be more properties in the city. Remote villages don’t have services, and it costs money for transport to access services. Travelling past the police 	<p>Communication to beneficiaries on vulnerability selection criteria and process for transparency and accountability:</p> <ul style="list-style-type: none"> • Although the questions in the assessment are fair, they did not understand why some families were prioritised over others. Some people need more assistance than others and some Syrian refugees lie about their conditions. • Not being able to reject a property and as a consequence being excluded from the project, the beneficiaries did not understand why some families were allowed to reject and others were

³³ Focus group participant, 31 August 2015

	Male tenants	Female tenants (and female tenants with special needs)
	<p>checkpoints risks being arrested.</p> <ul style="list-style-type: none"> • It is not good for any children here to walk alone as they will be harassed. • It's hard for a refugee to get a house and there are many people, but the process and criteria should be fair. People shouldn't be able to go ahead of others. <p>Suggestions:</p> <ul style="list-style-type: none"> • Criteria shouldn't be based on the numbers or on disability. The criteria is 9 people and above, female headed household or disability / war injury. 'Their mobility is hindered but we are still hindered in getting work'. • Cash for rent instead of reconstruction since reconstruction is more expensive than cash for rent. 	<p>not.</p> <p>Community tensions:</p> <ul style="list-style-type: none"> • Problems with neighbours bullying our children, and no support was provided on how to resolve these disputes. • Tensions with landlord living onsite, trying to control how the tenant live their life, evicting their guest, not allowing children to play outside, complaining about noise, trying to sign a new lease and abuse the tenant asking for rent. • Female tenants would prefer for disputes between female and landlord to be resolved between women (i.e. Female landlord or wife of the landlord) <p>Appropriateness:</p> <ul style="list-style-type: none"> • Many tenants said that they would have preferred to stay in their original house rather than changing, because they live in the city centre, they were nearer to the health facility, pharmacy and the house is not small. • More check on landlords should be done. • Technical standards: house was too small for large family, quality of the fitting was low (door handles breaking), ventilation issue, roof leakage, electrical wiring issues, security and safety issue with not grills on windows, water tanks too small and dirty, kitchen not fit for purpose (no space to put a stove which results in safety issues, i.e. burns). • At the move-in families would have preferred to come a day early to clean the house before moving-in. • Utility bills: issues with splitting utility bills with landlord when living onsite, issues with landlord adding people to the meter. <p>Suggestions</p> <ul style="list-style-type: none"> • When lease is finished, provide support to beneficiaries in finding another property to rent when landlord is not willing to rent for personal reasons. • Improving matching process • Provide assistance for the most vulnerable who are on the waiting list.

For completeness, we note comments from landlords during focus groups as follows:

<p>Landlords:</p> <p>Positive consequences</p>	<ul style="list-style-type: none"> • Provides a financial support to finish properties, construction works etc., even if the amount of the contribution does not cover the whole cost of the renovation. With this support available, it makes sense to bring forward the renovation to take advantage of the assistance being available. • NRC was committed to the payment and schedule of payments, and paid on time as agreed, including the advance payments. • It has increased the numbers of properties in the local area. • The project has benefited contractors and the construction industry. • It is a humanitarian project and a humanitarian cooperation from Jordan landlords, and provides shelter to Syrian refugees whilst being beneficial to Jordanian landlords. • At the end of the contract lease, the building returns to the landlord for his personal use. Some landlords planned to use the property for their own purposes (e.g. for a son when he gets married), but most landlords planned to rent the property commercially once the NRC lease expired. Landlords were generally willing to rent again to the NRC tenant, but on the condition that NRC paid a commercial rent or offered some new incentive. • Many landlords live in an adjacent property (e.g. the next floor of an apartment building, or a building next door) and have regular interactions with the tenants. They can monitor water and electricity usage, and address any problems or repairs required.
<p>Landlords</p> <p>Negatives consequences</p>	<ul style="list-style-type: none"> • NRC's construction standards are too low, and do not allow for finishes such as tiling which is essential to protect the property and maintain a standard so it can be rented out commercially in the future. • NRC does not rent all the housing units in the property or building, so landlords are not able to rent the other housing units and are losing money. For example, if an apartment has four housing units (bedrooms), NRC may rent three of these bedrooms but it is impossible for the landlord to rent out the fourth bedroom because no one is willing to rent the bedroom when the house is crowded with Syrian refugees. • Refugees do not take care of the property and they damage and destroy the house, perhaps also due to overcrowding. The kitchens, bathrooms and septic tanks are designed for smaller families, but these get excessive use due to the overcrowding. • The cost of the finishings are much higher than the grant provided, and almost all landlords contribute some of their own money to bring the house to a standard they consider to be satisfactory. • The timeframe for the construction contract is too short, because it is based around only doing the minimum construction standards, but almost all landlords go beyond these minimum construction standards and the construction takes longer. For example, some landlords said they invested more than double the amount of NRC's contribution from their own funds. • Many of the selected houses have only barely begun construction, so in reality the entire property needs to be built. This is a major construction project and takes time, but NRC treats it like a small project to finish a mostly constructed property. • Landlords suggested that the contract should be 2 years rather than 12 - 18 months so that landlord gets more money and refugees can stay longer (e.g. a contribution from NRC of JOD 2,000 per housing unit, in return for a 2 year lease)

14. Which additional programming options might be used to complement or replace current programme design to improve effectiveness and impact?

The current NRC Urban Shelter Programme is designed using an *integrated approach* and includes a variety of programming options. The *integrated approach* is appropriate to the current context where needs often vary

from one family to another and therefore allows for flexibility in the assistance provided and responds better to the diversity of needs.

NRC is currently providing the following programming options as part of the Urban Shelter Programme:
Shelter

1. Cash for landlords to finish un-finished units in exchange of 12/18month free-rent/lease agreement to host Syrian Refugees
2. Cash assistance for Syrian Refugees as a (reintegration package) once they move-in to the property
3. Cash for landlords and beneficiaries for renovation/repairs of sub-standard housing units
4. Cash for landlords to integrate solar system/energy programming in exchange of a free rent/lease extension.

ICLA

5. Provision of basic information / eviction monitoring / collaborative dispute resolution for landlords / beneficiaries
6. Information to acquire access to services for anyone (drop-in centre),
7. Small scale initiatives together with partners – e.g. promotion of the revised standard lease through the SWG, training on birth certification in conjunction with MSF, legal representation via referral to national legal aid organisations.

These are being successful to a certain extent but could be improved to increase the impact and the sustainability of the programme. Additional options may be considered to better complement the objective of the NRC Urban Shelter Programme.

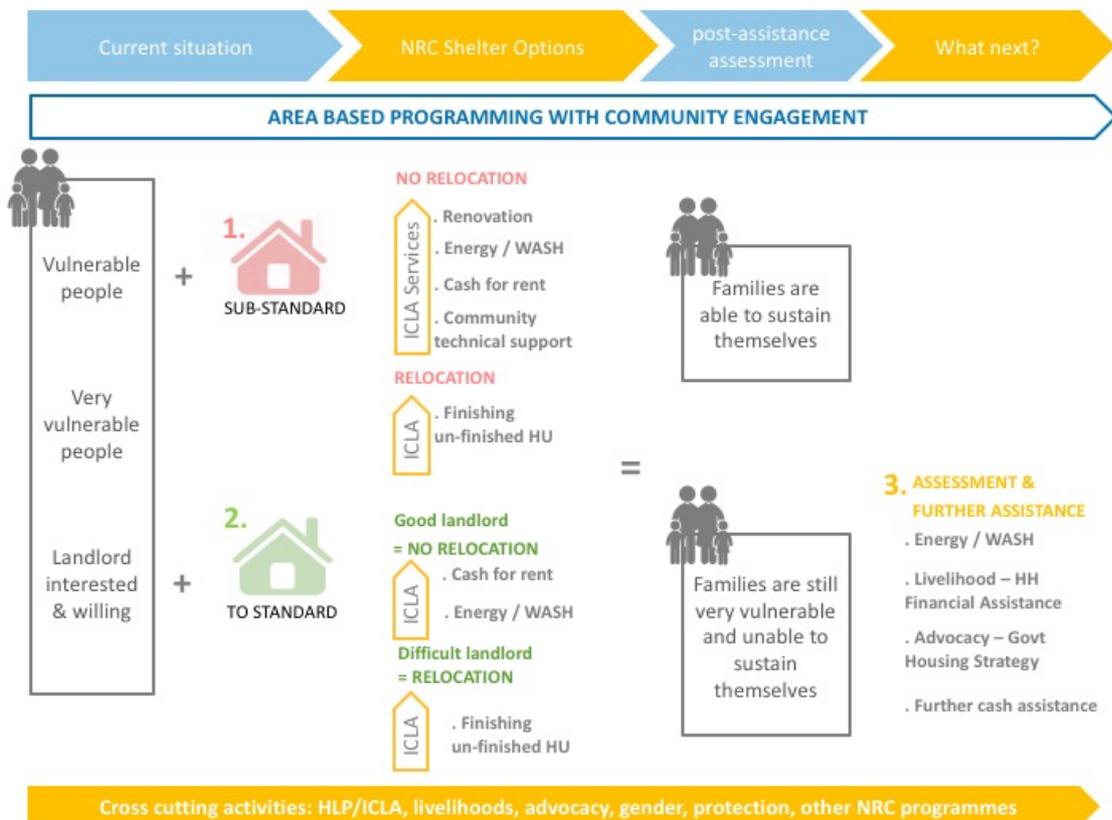


Chart: Shelter options

Review modalities and broaden the current portfolio of options:

NRC has expanded its assistance from 1 shelter option to a portfolio of option including ICLA services and other shelter options (at this point, predominantly relocation to a finished unit and to a lesser extent, repair). NRC should consider developing a decision tree to identify which shelter option is most relevant to the condition of the beneficiaries they assess. For example, if a family is living in a property that is to standard or can be upgraded, the family should not be displaced to a newly finished property. (refer to Chart: Shelter options)

Finishing-up of unfinished unit:

This shelter option has developed and evolved significantly over the past 2 years of implementation. The teams have learnt and improved to maximise the impact and success of this options. It seems that the other options have not reach this maturity and in many cases the learning from this modality needs to be applied to the other modalities. As the programme has evolved, NRC has considered limiting relocation and providing other shelter option to better respond to the needs of the population of concern. The impact of this needs to be considered (i.e. Less new housing units created, but also less risks of unnecessary displacement and lower costs per beneficiary).

Cash for Rent (new options to consider)

According to the Shelter Working Group, rent represents the largest proportion (57%) of refugee households' expenditure, followed by food (24%) and utilities (8%), and 91% of refugee live in rented accommodations.

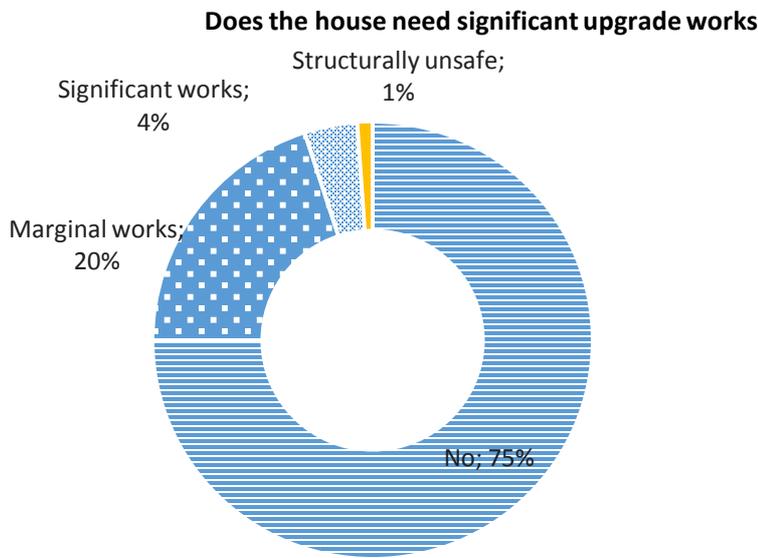
The option of finishing-off unfinished units has been successful in many cases, but many Syrian refugees in FGDs explained that they would have preferred to stay in their original property and received direct cash assistance. When the programme was initially designed there were more actors providing cash assistance. Although many tenants perceive the cash provided to landlords as the equivalent of the rent they could receive (3 or 4 years of rent), some still said they would prefer cash for rent even for only 12/18months in their original properties. But as they did not want to be excluded from the project they accepted to relocate, sometimes to other neighbourhoods to receive NRC's assistance. Considering the concerns of displacing families, these unnecessary relocations should be minimised to the absolute necessary. Thus providing cash for rent, in some cases, might be more relevant, and cost effective.

If NRC prefers not to provide cash for rent, and the family does not need to be relocated or the property does not require any upgrade; NRC could consider providing assistance on essential items combined with an unconditional cash grant could be another option. (e.g. NFIs, clothes, school clothes (if appropriate), hygiene kits/dignity kits, combined with financial management training (provided by Syrians themselves), and small cash grant if appropriate.

Renovation/Repairs (option to revise)

In other cases, beneficiaries explained that their original property was not up to standard and were happy to relocate. In this case, providing the relationship with the landlord is generally satisfactory, NRC could consider ensuring that the property cannot be upgraded to the minimum standards before offering the relocation option.

As per the analysis provided by the Shelter Team the Renovation/Repair programme has not achieved its initial objective. The analysis below shows that 75% of the properties assessed did not qualify for the renovation programme as they required minimal/no works, and therefore less cash than anticipated for renovation/repairs. Considering that 86% of the population is under the poverty line it could be assumed that these would need assistance either for minimal renovation/repairs or cash for rent.



Lessons learned from similar programmes in other countries has promoted providing fixed cash amount based on number of HU to repairs, rather than based on a BoQ. However, the graph above shows that this approach does not work, as most HU do not fit within the established categories. NRC could consider lowering the threshold of repairs required to qualify for this programme, which would increase the number of families NRC could reach with this programme.

Additionally, NRC could consider providing a mixed assistance with an amount for the repairs assistance to reach an agreed standard and combining this with an additional cash assistance, similar to the cash grant provided per housing units when a family moves into a new property.

Core House (new option to consider)

NRC has identified a gap in the market with the lack of small properties. Building properties is an entire other type of assistance NRC might or might not want to consider.

In many context organisations have considered building “Core Houses” building housing unit and kitchen and bathroom, which could be approximately a 30m2 property (15m2 HU, 10m2 Kitchen, 5m2 WC). A core house is designed in a way which can be expandable and extendable over time once the landlord/owner acquires enough money to expand the property. Refer to www.sheltercasestudies.org for examples.

UN-Habitat is supporting the construction of new small property in collaboration with the national authorities. They are piloting the construction of 20 properties of 65m2 for an estimated cost of 12,000 to 15,000 JD. Essentially the project aims at facilitating the access to bank loans, and connecting developers and supporting the design development. They are projecting a need for 100,000 units, but will only be funding 20 units on a demonstration basis.

NRC might want to support this project through stronger coordination effort with UN-Habitat and see how the programme could fit into the bigger shelter and housing strategy.

Post-lease Matching (new option to consider)

Many tenants explained that they struggled to find new property once their lease had ended. Some explained that their contract was coming to an end and they had to move out, and they could not find another property to move to. When the ICLA team provides orientation for the end of the lease period, they could consider matching tenants with landlords considering the extent of the current database. Most tenant are willing to start paying rent but do not always find a suitable property in the right area, and landlords who wish the rent

their property once the first lease agreement has terminated might benefit from this service. This could also offer a form of livelihoods assistance to vulnerable Jordanian landlords, if the programme takes the approach of targeting poor landlords more explicitly.

Landlord – cash assistance packaging:

The programme is currently based on a budget /Number of HU. This is resulting in landlords increasing the rent by dividing the amount of cash provided in the number of month. NRC should consider packaging the assistance differently so that landlords understand what portion of the cash provided is for the construction and which part is for the “free rent”. This could limit the pressure of unrealistic rental expectations in areas where NRC is increasing the number of housing units.

Advocacy and Protection

Many of the current issues the programme is facing had been anticipated by the advocacy and protection team. Stronger two way coordination with the Advocacy team would be beneficial, and would help NRC leverage and expand the space for shelter and ICLA assistance, as well as ensuring that NRC’s advocacy benefited from the wealth of case study and CMS data which the shelter and ICLA teams have collected.

NRC could advocate to attract additional shelter actors to the sector, as the scale of needs exceeds the capacity of individual NGOs to meet. NRC could also advocate for Government social housing policy, such as the requirement by Government that new private developments include housing to be set aside for vulnerable people.

Area based Programming:

As discussed above, NRC could shift to an area based programming approach, to reinforce synergies across NRC’s programme areas, and deepen engagement in communities where NRC is working. Stronger community connections could open up new opportunities for collaborative dispute resolution approaches (through community dialogue), and more efficient distribution of information (through community centres and community focal points, rather than one on one face to face visits). Community skill exchanges could take place, even where direct employment is not permitted.

The Government is encouraging increased resilience programming to provide support to host communities. Much of NRC’s existing programme does already provide support to host communities – through repairs and finishing houses with Jordanian landlords. An area based approach would also allow NRC to articulate more clearly to Government and stakeholders the work it was doing in specific locations. It should also be possible to provide at least some of these services to vulnerable Jordanians – e.g. tenancy advice.

Livelihoods and Household financial management

We understand that NRC is reviewing its livelihoods programming options. We note that livelihoods options would not necessarily need to be provided by NRC. However, NRC could play an important role in advocating to donors and Government for some access to livelihoods. Without some form of livelihoods assistance, refugees are either reliant on donor assistance, and / or are seeking informal work opportunities. The absence of credible and legal livelihoods options has been a significant factor in constraining NRC’s relocation option from providing as full an impact as it may otherwise have had.

Livelihoods options could potentially include:

- Household financial management, saving strategy, financial planning (between Syrian families)
- Home-based livelihood programmes
- Skills exchange
- Vocational training
- Micro-finance

Some respondents suggested that NRC could rehabilitated infrastructure to be used for informal livelihoods – e.g. a space to use as a shopfront. Again, we note the sensitivities around livelihood programming, and the fact that NRC’s rehabilitation assistance is provided for shelter rather than livelihoods. However, we also consider there is merit in conveying to NRC the requests for assistance made by beneficiaries – as they strongly request financial and livelihood support due to the limited legal work opportunities.

ICLA

As discussed elsewhere, ICLA could have a greater impact if it was de-linked from shelter. There does now appear to be consensus that while ICLA programming remains sensitive, there is greater space available now for ICLA to expand into than existed previously. NRC has been engaging more formally with the Government of Jordan on justice / ICLA related activities through the Jordan Response Plan process.

ICLA could therefore progressively seek to expand its beneficiary base and focus more on identifying and reaching non-shelter beneficiaries, particularly the most vulnerable populations who have not received assistance from Shelter to date.

At the same time, we would encourage the development of ICLA with a strengthened collaborative dispute resolution role, and more deliberate and progressively public engagement on more traditional ICLA roles of HLP, legal status and civil and legal documentation issues. While ICLA has successfully done some work already in these areas, it has been constrained by focusing predominantly on shelter beneficiaries, or by working with less prominence through partner organisations. ICLA has not yet had the space or support to pursue fully some of the initiatives that it has commenced, e.g. fully supporting the roll-out of the revised standard lease beyond NRC and the SWG, e.g. by engagement with the Jordan Bar Association.

While potentially quite sensitive, there is a range of important and needed work that ICLA could do in relation to MOI service card re-registrations. This could range from increasing analysis and advocacy on issues identified through case work, through to supporting beneficiaries with additional legal counselling and legal assistance (either directly or through partners). Notably, ICLA could do contingency planning on how it could respond if the MOI does not grant further extensions of time to allow remaining refugees to register, and what the impacts might be of forced large scale returns.

Birth registration is another potential field where further support could be provided. Parents who cannot pay the medical costs cannot get the birth documentation from the hospital. Parents who do not have a valid certificate of marriage cannot easily prove their marriage and also face obstacles in registering births. Delayed birth registration exposes families to liability to pay fines, and failure to register a birth leads to risks of statelessness, difficulty in accessing services, and potentially jeopardising future rights to return to Syria.

We would encourage the continuation of NRC’s efforts to understand HLP and civil and legal documentation issues in Syria, to ensure that accurate information is provided to refugees and ultimately to try to preserve refugees rights and ability to return. On a practical note, a better understanding of utility fee arrangements in Syria may help the ICLA team to convey information to Syrian refugees in a manner which is easiest for them to understand and relate to.

14. How does this programme affect tensions within communities?

The programme has both positive and negative impacts on community tensions. The impacts are positive, in that:

- NRC assists Syrian refugees to be placed within host communities.
- Both Jordanians and Syrians benefit – Jordanian landlords benefit by improvements to their properties, and Syrians benefit from obtaining rent free shelter and security of tenure for a fixed period.

- ICLA provides collaborative dispute resolution to address issues which arise between the landlord and beneficiary.

However, the programme also has potential negative impacts:

- There are some communities where refugees are unwelcome. For whatever reason, any patience and tolerance the community may have had towards refugees has been exhausted, and they are now perceived as a burden on limited infrastructure and competing for work. Some refugees have unfortunately been placed in more hostile or conservative communities.
- ICLA's collaborative dispute resolution focus is predominantly on landlord – beneficiary relationships, rather than community – beneficiary or host community – refugee community relationships. With proper engagement of local stakeholders and representatives, ICLA could leverage their CDR expertise to facilitate dialogue and confidence building between host communities and refugees, to more effectively address housing and land-based disputes (e.g. use of property).
- In some locations, a large number of properties have been selected in a small geographic area – e.g. 10 houses in one street. This may be more efficient from an engineering site management perspective, since it makes it possible for few engineers to supervise multiple construction sites simultaneously. However, placing a large number of refugees simultaneously into a community has impacts on the community, which should be allowed for.
- Services are seen as earmarked for refugees and not for vulnerable Jordanians who may equally be in need. This can exacerbate community tensions.

The programme also needs to manage or assuage stereotypes and community concerns. For example,

- Some focus group members said they would refuse to participate in the programme, since the refugees would damage their house through recklessness and overcrowding, and would spy and disturb their neighbours with noise and visits from unrelated guests.
- There is a perception held by at least some respondents that Syrian refugees are not actually poor but are willing to lie and 'game' the system to exploit the assistance available to them from the international community.

Syrian refugees also expressed sensitivities about engagement with their neighbours.

*"I can't let my children play outside because I'm worried they will get into a fight with the neighbour's children. We are on good terms with the neighbour but we worry if the children fight they will take the side of their children and we will be in trouble and may be deported. If people take advantage of us, we can't file a complaint because they will take the side of the Jordanian"*³⁴

Recommendations:

- NRC should enter new communities in a more structured and systematic way, taking into account broader factors than the availability of suitable housing stock. This includes considering the availability of infrastructure, services and the culture (conservativeness) of the area.

³⁴ Focus Group discussion drop in centre users, 31 August 2015

- NRC should re-establish or deep its engagement with local actors, including municipalities and community stakeholders. Recruiting or developing some national staff with a background in community development may be of assistance with this.
- On the basis of deeper and broader relationships with stakeholders, Shelter would be better informed at making site selection decisions, and ICLA could build on some of the approaches it has already adopted to use respected community leaders to conciliate disputes. Potentially, ICLA could look more at CDR between refugee and host community, rather than refugee – landlord disputes.
- NRC should be aware of and engaged in the UNHCR sponsored host community – Syrian refugee dialogue sessions which take place in communities with high refugee populations – these sessions can provide an early warning mechanism for contentious issues.
- NRC could improve the way it packages information for Jordanian audiences, to highlight positive case studies as a way of breaking down stereotypes.

15. What (anecdotal) evidence is there of the consequences resulting from the programme’s effect on the rental market?

The evidence of the programme’s effect on rental market prices is anecdotal and subjective. Although the initial theory of change was constructed around the (very logical) notion that injecting additional housing stock into the housing market would have a tendency to cool rental market prices, there were no indicators or means of verification set for this. UN Habitat and the Government have reportedly undertaken a study on the housing market. However, the results of this study have not yet been released. It is possible that the study would provide a more empirical basis to review the Urban Shelter Programme’s impact on the housing rental market – however, this is by no means certain.

NRC’s research reports note that:

“Since 2013, there are at least 48,230 fewer housing units on the market than required to meet the combined need of Syrian refugees and Jordanians”³⁵ (more information/data on shelter stock³⁶)

and

“The growing gap between housing supply and housing demand has led to an overall increase in rental prices. According to the GoJ the average rental price across the country rose by 14% between January 2013 and January 2015.”³⁷

Much of the growth in average rental prices is likely attributed to rental price increases in Amman, and perhaps to a lesser extent, to prices in other major cities including Irbid.

Relying on older data, CARE noted in April 2014 that “the average rental expenditure is JOD 166. Syrian households on average pay JOD 193 for rent, indicating a 28% increase from the baseline data for urban areas outside of Amman. Jordanians report lower monthly rental expenditure (JOD 107).”³⁸

³⁵ In Search of a home, NRC June 2015 (p.5)

³⁶ In Search of a home, NRC June 2015 (p.18)

³⁷ In Search of a home, NRC June 2015 (p.14)

³⁸ Care Jordan, Urban Refugees and Host Communities, April 2014 Report

During focus group discussions as part of this evaluation, the consensus was that rental house prices in the programme areas had either cooled or remained stable, and that the strong price pressures had subsided for per-urban and rural areas. There was reportedly a slight increase in housing prices in the immediate town centres, although NRC does not typically place beneficiaries there due to limited availability of housing stock.

Several factors were cited as relevant to the overall softening of rental housing prices:

- That the Government of Jordan had effectively closed the border, and the large scale cross-border influx from Syria had ceased (although it could easily resume, if the border was reopened).
- That many refugees have now left Jordan on their way to Europe, and fewer refugees are searching for rental accommodation.
- That NRC is accommodating up to 10% of the refugee community in new houses around Irbid, which has reduced the competition for properties and reduced rental inflation.

It should be noted that if NRC is accommodating a significant percentage of the entire refugee community, the simultaneous expiration of a large portion of these leases could lead to a price shock on the rental market. If NRC simultaneously shifted to making a significant proportion of its programme cash rental payments for long term leases, this could potentially further heat the housing market.

During focus groups, tenants noted anecdotally that some landlords had unrealistic rental expectations as a result of receiving assistance from NRC. For example, some landlords based the requested new lease agreement on the cash provided by NRC (for finishing off and 12/18months rent) divided by the number of months in the original lease". Ex: 5,400 JD for 18months contract = 5,400/18= 300JD, so the landlord is requesting 300JD/month for the new lease, which is approximately double the market rate. As tenants could not afford to pay the requested rate, in practice the unrealistic expectations appear to have had limited impact on prices. However, tenants suggested that the leases should be issued for a longer period which more closely approximates the rent payment – e.g. a 36 month lease for a JD 5,400 investment would be JD 150 per month, or approximately the current market rent.

16. To what extent does the programme feed into the longer-term Government of Jordan development strategy?

The Government of Jordan is taking a leading position in all humanitarian response in the country with the JRP and task force. The GoJ categorises donor projects as 'Refugee' or 'Resilience' programmes

NRC's programme is in principle aligned with the objectives the Government has stated, in that substantial benefits accrue to host communities and Jordanian landlords through the further development of housing stock, contribution to local employment of construction workers, and stimulus for local businesses through construction material sales and injection of cash into the communities. It will be important for NRC to be able to report the achievements of the programme in the language and wording used by the Government to set their priorities.

Close coordination with national and local authorities is essential to get government buy-in, and general endorsement of NRC projects across the country. Coordination with authorities should be done not only when there is need for endorsement but throughout the project development implementation and monitoring and evaluation.

NRC is the co-chair of the Shelter Working Group, the NGO representative in the Task Force, the chair of the Basic Needs Working Group and the chair of the Jordan NGO Forum. These prominent roles provide a platform for NRC to advocate on shelter issues, and to support the update of the Government Housing

Strategy, and to ensure that it responds to pre-existing shelter issues that have been exacerbated by the presence of high numbers of refugees. Such a strategy should draw on lessons learnt from the Iraqi refugee response and needs to be rooted in updated, location specific needs analysis. The strategy should explore national private and public sector shelter programmes including micro-finance and other competitive loan agreements that can scale up the existing humanitarian/development shelter response to what is required to meet the housing need of Jordanians and Syrian refugees.

The JRP 2016-2018 was under development and consultation with stakeholders during the evaluation period. We understand that activities under the draft plan included increased legal information, access to legal aid for both Syrian refugees and Jordanians, along with capacity development of the formal justice system, strengthening of the juvenile justice system and Shari'a courts. It is likely that there will be some activities in the JRP which are consistent with NRC's programmatic objectives.

Recommendations:

- When reformulating the current theory of change, NRC should package the programme to fit within the government "resilience" programme, and be able to explain the project to the authorities in the Government's own language, highlighting the benefits for the Jordanian population (Jordanian landlord, Jordanian construction industry, Jordanian housing stock, and employment of Jordanian staff in most international organisations). Knowing the Government's concerns makes it easier to develop the messages and tailor them for specific audiences – e.g. in terms of NRC's contributions by adding housing stock, or in terms of NRC's contributions by helping combat rental inflation and provide employment.
- Continue to strategically use NRC's positions (co-chairing Shelter Working Group, presence in the Government Task Force, Chair of the NGO forum, etc.) to advocate for shelter policy improvements.
- Develop relationships with UN-Habitat, who is potentially a strong partner of the Government in Resilience programming, and strong influence on the Government's National Housing Strategy.

Sustainability

Overall, the programme has had positive sustainable results. Notably, the programme was designed to advance the investment decisions of Jordanian landlords to complete their unfinished houses, and the programme has proven effective in this. Interest in the programme has grown, and there is now a waiting list of applicant landlords and beneficiaries. The additional completed houses anecdotally have a cooling effect on rental prices, which have reportedly stabilised in Irbid and surrounding areas.

17. How can the programme be modified to mitigate the risks faced by vulnerable families reaching the end of their contract?

The evaluation team agrees that beneficiaries face significant protection risks at the conclusion of their contract. Due primarily to external factors, such as limited legal livelihoods options and reduced donor assistance, many beneficiaries will return to a precarious situation at the conclusion of the lease.

There is no simple answer to this issue. Continuing to provide assistance to the same beneficiaries undermines the capacity of the programme to assist new beneficiaries, as NRC has limited financial and human resources.

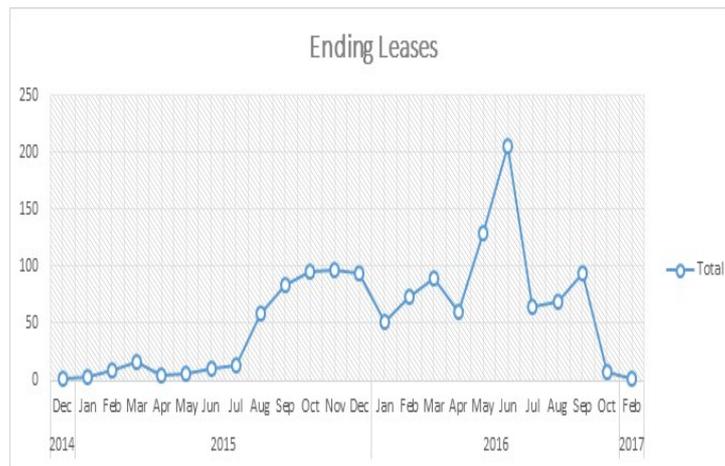
We offer the following points for consideration:

- Use relocation options as a last resort. By relocating a beneficiary, they move from a property they have chosen to a property chosen for them by NRC. They may be separated from their social networks, and they may be exposed to a range of protection issues at the new site. At the conclusion of the lease there is no tangible assistance to help defray the costs of moving to another property. Where feasible, assisting a beneficiary to remain in place avoids the costs and dislocation of shifting from one property to another.
- Where NRC assesses that there is ongoing need or vulnerability, it may be possible to transition the beneficiary into another NRC programme (WASH, energy, renovation, cash, education, youth, etc.).
- NRC may be able to refer beneficiaries for assistance provided by another organisation. As each organisation has their own eligibility criteria, some organisations may decline to provide shelter assistance to a beneficiary if they have already received substantial shelter assistance from NRC in the same year.
- Where NRC has identified protection concerns, NRC could provide ICLA support to the beneficiary after the lease expires – for example, in negotiating and entering into a new lease, in monitoring the new tenancy to ensure that the beneficiary is safe and free from exploitation, and referring back to NRC and other services to deal with any newly emerging issues. This support is already provided where the beneficiary remains in an NRC property. Where the beneficiary relocates to a new property outside the NRC programme (e.g. moving in with relatives), the extent to which ICLA services are provided or desired to support the new tenancy arrangement is not clear.
- ICLA is currently visiting the landlord and beneficiary on a monthly basis for the last three months of the lease, to encourage preparations for the end of lease. The effectiveness of this approach is likely to be incremental, as based on the focus group discussions we consider it likely that both the landlords and beneficiaries would be anticipating follow up support from NRC, and unready to enter into realistic preparations for post-lease arrangements until close to the moving out date. The landlord and beneficiaries would have some justification for this expectation, as NRC has provided some follow up support to some beneficiaries, including people with specific protection concerns.

The ICLA team should consider whether there are things which can be done to make their support in this end of lease period more effective – in particular, identifying what strategies have worked to prepare beneficiaries for post-lease arrangements, which are the most effective times to present these strategies, mapping the obstacles beneficiaries face in relocating to a new property (e.g. money for moving expenses), shifting the approach from a conversation to jointly filling in a post-lease plan to make the issue appear more formal, etc.

From our own discussions with beneficiaries, we appreciate that at least some beneficiaries are reluctant to plan for the end of the lease, quite possibly because they have few resources, few options and the entire situation can be overwhelming. Consistent, structured support from ICLA could be useful to help some beneficiaries take control of the situation before the final day of the lease.

- As the Shelter team scaled up to manage high volume lease inception, so there will be a corresponding high volume period when many leases are expiring simultaneously. The Shelter and ICLA teams should proactively plan how these intense periods will be managed, and in particular how beneficiaries with significant protection concerns will be supported. The chart below shows the forecast end of leases, with a significant jump from August 2015 onwards and in particular, a spike in mid-2016. The mechanisms and procedures which were effective when dealing with 10 leases ending a month may not be viable when there are 100 leases ending each month.



- Ultimately, many of the concerns remain because refugees have limited access to legal livelihoods options. NRC could advocate for greater access to livelihoods options, including informal cottage industries and household financial management training – which could also potentially be conducted by Syrian volunteers. We appreciate the sensitivities of both livelihoods programming and the use of Syrian volunteers, and we understand that NRC is currently reviewing livelihood programme options.

18. What proportion of tenants terminate their leases early? What are reasons for early termination?

NRC’s early move out study (July 2015) notes that 8% of tenants terminated their leases early (129 early move out cases from 1649 properties). The study categorises an early move out as when a tenant leaves their property before the final 3 months of the lease. Tenants who leave in the final 3 months of the lease were classed as regular completion, which is arguably somewhat generous, particularly for 12-month leases.

When tenants left early, NRC was generally called upon to address issues – including unpaid bills for utilities left by the tenant, damage to the property allegedly caused by the tenant, or allegations of harassment and unsuitability of the landlord.

In 71% of cases (91 out of 129), NRC had placed a new tenant in the property, to benefit from the remaining lease. Other properties were still being rematched with tenants, or were frozen (3) pending the resolution of issues with the landlord.

During the evaluation, we convened a focus group of tenants who had left early, and a separate focus group of beneficiaries who had refused their 'matched' house.

There were some (relatively few) issues raised of recalcitrant landlords interfering with the tenant and attempting to drive them out of the property so the landlord could use it for their own purposes.

However, most respondents said they left the house because it was unsuitable – generally that it was in a village and too far away from services, too far from work opportunities and too expensive to travel. Other respondents said that the houses were unsuitable – they had problems with water supply, they were on septic tanks which needed to be regularly pumped out at the tenant's expense, they were not appropriate for the special needs of the family, or they were poorly ventilated or too hard to heat or cool.

Notably, tenants who refused to accept their 'matched' property (for what the tenants considered to be very valid reasons) reported that they had been told that they were 'out of the programme' and would not get further assistance from NRC. As discussed above, this is potentially coercive. If the advice is a result of a deliberate policy, then the policy should be reviewed very closely.

We understand that NRC has commenced a more comprehensive study of tenants who move out. It would be valuable for NRC to also explore people's intentions concerning the end of the lease – is the landlord open to continuing the lease for the tenant? Does the tenant plan to continue the lease or to leave? And then post-lease, what actually happened? Did the intentions match the outcome?

Annex 1 – Evaluation Terms of Reference

Evaluation of NRC Jordan integrated urban shelter / ICLA programme

Country: Jordan
Duration: The contract will be for up to 50 person days over a period of 3 months
Reporting to: Programme Director, NRC Jordan

1. BACKGROUND INFORMATION

1.1 Background on the conflict/context

The Syrian conflict, now in its fifth year, has resulted in large-scale displacement both within Syria and across the region. The latest estimates put the number of internally displaced within Syria at 7.6 million and the number of registered refugees across the region at close to 4 million. Jordan hosts more than 627,000 registered Syrian refugees, the equivalent of some 10 per cent of the Jordanian population. Over half a million Syrian refugees in Jordan live in host communities spread throughout Jordan (approximately 84 per cent of the total refugee population).

Syrian refugees are facing prolonged, and often multiple, displacement, struggling to secure basic subsistence in poverty pockets of northern Jordan where access to basic services was already overstretched. Schools and hospitals are running beyond capacity, competition for jobs has driven wages down, and prices for food, fuel and rental accommodation have increased significantly. The resilience of Syrian refugee households and Jordanian communities is declining causing increased tension within communities. A recent assessment indicated actual or fear of rising rental prices and competition to secure housing as the two main areas of tension between refugees and host communities in Jordan.

1.2 Background on the thematic area in this context (e.g. not NRC intervention specific but for example the food security situation in the country).

Inadequate shelter: NRC household assessments reveal that one in five Syrian refugee households live in shelters that cannot offer them basic protection from the elements. The accommodation Syrian refugees have been able to find is often overcrowded. This overcrowding is compounded by the fact that more than half of all families assessed by NRC are sharing with at least one other family (usually part of their extended family).

Lack of security of tenure and multiple displacements: According to UNHCR, One in five Syrian refugee families assessed in host communities do not have any form of rental contract. NRC

analysis suggests that the ones that do often fall far short of guaranteeing security of tenure, with some 10% of Syrian refugees under immediate threat of eviction.

Economic vulnerability: Rent equates to more than half of all refugee household expenses, but only 10% of refugees report that they have any savings left to pay their rent. One in 10 families assessed did not know where the money for their next rent would come from, exposing to them ongoing risks of eviction. Many Syrian refugee households in Jordan facing their fourth year in displacement are now in debt and the overall debt is increasing.

Legal status and civil documentation: The Syrian refugees are required to register with the Ministry of Interior (Mol). However, for many living outside camps, it is often not clear if or how they can obtain and renew their Mol service cards. Without a service card and/or UNHCR registration, refugees living outside camps are often unable to access basic public or humanitarian services, or register marriages, births and deaths, and are at greater risk of arrest, detention and deportation. Refugees require information and counselling in order to understand both their rights and the services available to them; in addition, they have to be informed about the procedures – whether legal or administrative – that must be followed in order to access these rights and services.

1.3 NRC's Presence and Activities the Country

NRC's Jordan country programme was started in August 2012, with main focus to support UNHCR in setting-up and operating Zaatari refugee camp. In 2013, NRC launched its first non-camp operation through its Shelter programme in Irbid. Soon after, an Information, Counselling and Legal Assistance programme (ICLA) was integrated with the shelter programme to widen the range of services provided to beneficiaries. NRC currently operates in 3 major Syrian refugee camps (Shelter, ICLA, Youth, Education) and 3 Governorates in the North (Shelter, ICLA, Education).

1.4 NRC's Intervention (related to the core competency to be evaluated)

The objective of NRC's joint shelter / ICLA programme in Jordan is to support the creation of new housing units in local communities to provide adequate and secure shelter for refugees living in host communities. In addition, the programme seeks to provide Syrian refugees in host communities with information and counselling in relation to their rights to registration, housing, and access to essential services.

Through the Shelter programme NRC upgrades and rehabilitates existing housing units which are unfinished or incomplete and require a degree of work to bring them to adequate and set standards (excluding units needing structural works). Contracts between NRC and the local property owner, as well as lease agreements with beneficiary refugee families ensure that refugees live in the created housing units rent-free for 12 to 24 months. Buildings are selected for upgrade works based on the willingness of the owner to adhere to the project provisions, the buildings' structural safety, their location (including reference to relevant social factors that affect hosting) and the ability to bring them to minimum standards at a reasonable cost. Funds are provided based on a set funding table which depends on the number units and the rent free period.

In coordination with the Shelter component, ICLA case managers provide support to Syrian refugees through outreach visits to NRC shelter units. Within a month of beneficiary families moving in to completed properties, case managers visit them in their new homes to ensure that no issues have arisen regarding maintenance of the property, or that may affect tenants' security of tenure. Particular focus is on sharing timely and reliable information and counselling on: (i) access to essential services and follow-up referrals to partner agencies, (ii) guidance on landlord-tenant disputes and support on lease agreements; and (iii) information on how to obtain necessary legal identity and civil documentation, including birth and marriage certificates.

The target population for NRC's intervention is vulnerable Syrian refugees residing in host

communities in northern Jordan. NRC uses vulnerability criteria that score highest those households that are at risk of eviction, and/or are overcrowded. Female headed households, individuals with physical disabilities, the elderly, and other highly vulnerable individuals and groups are further prioritized as they are more likely to resort to negative coping strategies and less likely to have secure tenancies. NRC has been working closely with and fed into the inter-agency Vulnerability Assessment Framework (VAF) and will align and harmonize its scoring based on VAF, as the framework develops. In addition to Syrian refugees, the project also benefits members of the host community, providing investment and jobs in locations affected by the crisis.

2. PURPOSE OF EVALUATION AND INTENDED USE

The main purpose of the evaluation is to support learning and to provide guidance for future programme direction and evolution.

The primary user of the evaluation is the NRC management team as well as Urban Shelter and ICLA teams who will directly utilise the evaluation findings to adjust programme implementation and improve its quality and to guide the future direction of the programme.

Secondary audience will be NRC Head Office and Regional Office, namely global shelter and ICLA advisors as well as regional M&E and Program Advisors, as well as other NRC country programmes where similar implementation approach may be applicable. The evaluation will support the transference of learning from the Country Office to NRC more generally, in particular because of the innovative way in which shelter and ICLA are so closely linked in this programme. Specific lessons learned and good practice shall be disseminated both within the NRC Jordan programme and more widely within NRC.

3. SCOPE OF WORK AND LINES OF INQUIRY

3.1 Evaluation Scope

The evaluation will cover the integrated shelter/ICLA program in support of displaced people from Syria, which has been implemented in the Northern Governorates of Jordan (Irbid, Jerash and Ajloun) since 2013.

3.2 . Lines of inquiry

The evaluation will look to answer the following questions:

- To what extent does the programme ensure Syrians' right to adequate housing?
- To what extent does the programme contribute to Syrians' awareness and ability to access their rights?
- To what extent does the programme reduce Syrians' need to resort to negative coping mechanisms?

More detailed sub-questions are available in Annex 1, divided by the ALNAP Evaluating Humanitarian Action criteria.

In addition, NRC has identified one focus question which is included in all external evaluations in 2015: Are we reaching the right people? Please see the background note attached, in Annex 2.

The evaluator / evaluation team is invited to propose a study design and methodology, as part of the inception report phase, which will answer the questions outlined above. The emphasis will be on qualitative approaches, to complement the significant amount of quantitative data about the programme already available, and building on a strong theory of change for both the shelter and the ICLA components. For selection of an evaluator, demonstrable experience of qualitative evaluations, such as process tracing or most significant change, is desirable.

At a minimum, the methodology should include a desk review of key documents, including analysis of existing quantitative data, semi-structured interviews with key informants, and methods to seek the views and perceptions of the targeted communities.

5. EVALUATION FOLLOW UP AND LEARNING

NRC follows up all evaluations with a management response, and its implementation is subsequently tracked. This will include the documentation of key learning which will be shared with the relevant head office technical advisor for circulation to NRC country offices.

In Jordan the result of this evaluation will be shared with the Shelter Working Group and with the most relevant donors supporting NRC Shelter interventions.

This evaluation, including the case studies will contribute to an annual learning review which feeds into annual strategic planning processes. Key findings will be reported to NRC's senior management team in Oslo.

6. EVALUATION PRINCIPALS

The views expressed in the report shall be the independent and candid professional opinion of the evaluator. The evaluation will be guided by the following ethical considerations:

- Openness -- of information given, to the highest possible degree to all involved parties
- Public access -- to the results when there are not special considerations against this
- Broad participation -- the interested parties should be involved where relevant and possible
- Reliability and independence -- the evaluation should be conducted so that findings and conclusions are correct and trustworthy

7. COORDINATION AND MANAGEMENT OF THE EVALUATION

Standard text: An evaluation steering committee will be established by NRC, with the following members:

- Programme Director
- M&E Coordinator
- Programme Advisor
- Technical Advisors for Shelter and ICLA

The Steering Committee can also draw upon a reference group consisting of:

- Country Director
- Shelter and ICLA Project Managers and selected Project Officers

The Committee Chair (the Programme Director) is responsible to facilitate access to information, documentation sources, travel, and field logistics. In case of any changes in the positions in country or at Head Office, the Steering Committee will be adjusted accordingly.

The Steering committee will oversee administration and overall coordination, including monitoring progress. The main functions of the Steering committee will be:

- to establish the Terms of Reference of the evaluation;
- select external evaluator(s);
- review and comment on the inception report and approve the proposed evaluation strategy;
- review and comment on the draft evaluation report;
- establish a dissemination and utilization strategy.

The main functions of the Reference Group will be:

- to facilitate the gathering of data necessary for the evaluation;
- to participate in the validation of evaluation findings, and to ensure that they are factually accurate;
- to contribute to the management response;
- to act on the relevant recommendations.

8. DELIVERABLES AND REPORTING DEADLINES

The evaluator/ evaluation team will submit three reports and three presentations:

- **Inception report:** Following the desk review and prior to beginning field work, the evaluation team will produce an inception report subject to approval by the NRC Evaluation Steering Committee. This report will detail a draft work plan with a summary of the primary information needs, the methodology to be used, and a work plan/schedule for field visits and major deadlines. With respect to methodology, the evaluation team will provide a description of how data will be collected and a sampling framework, data sources, and drafts of suggested data collection tools such as questionnaires and interview guides. Once the report is finalised and accepted, the evaluation team must submit a request for any change in strategy or approach to the NRC Evaluation Steering Committee.
- **Draft report:** A draft evaluation report will be submitted to the Evaluation Steering Committee, who will review the draft and provide feedback within two weeks of receipt of the draft report.
- **Final report:** The Final Evaluation Report will follow NRC's standard template for evaluation reports. The final report should include a maximum two page executive summary that summarizes the key lessons learned and should also include best practices case studies that can be shared with NRC's technical and management staff.
- **Presentation of findings:**
 - At the end of the field research, the evaluation team will present preliminary findings to validate and prioritise learning at the Jordan level.
 - After the Final Evaluation Report is submitted, the evaluation team will provide a final presentation for relevant stakeholders.
 - One Skype call for HO and other interested NRC staff who may benefit from the learning with the lead Evaluator.

All material collected in the undertaking of the evaluation process shall be lodged with the Chair of the Evaluation Steering Committee.

9. TIMEFRAME

Proposals should present a budget for the number of expected working days over the entire period, up to 50 person days.

The evaluation is scheduled to start at the end of June and fieldwork is projected tentatively in July, depending on the availability of the evaluator / evaluation team; however the evaluation should be finalized by the end of October, 2015, including the final draft of the report.

The evaluator/ evaluation team is expected to provide a suggested timeline and work plan for the evaluation based on these scheduling parameters and in keeping with the scope of the evaluation questions and criteria.

In event of serious problems or delays, the (lead) evaluator should inform the Steering Committee immediately. Any significant changes to review timetables shall be approved by

the Steering Committee in advance.

10. EVALUATION TEAM

NRC seeks expressions of interest from individuals or joint applications, ideally with the following skills/qualifications and expertise:

- Sound and proven experience in conducting evaluations, particularly utilisation and learning focused evaluations. Expertise in qualitative data collection techniques.
- Background in delivery of Shelter programmes (process rather than engineering focus) in an urban (non-camp) setting.

Additional, desirable knowledge, includes:

- Understanding of cash transfer programming and of rental markets
- Understanding of housing, land and property rights, and security of tenure
- Understanding of protection and related legal issues such as civil documentation and legal identity.

Necessary Skills:

- Fluency in written and spoken English is required
- Prior experience in Middle East
- Proven experience of managing evaluations of humanitarian projects in urban setting
- Experience of designing qualitative data collection methods and of managing participatory and learning focused evaluations
- Excellent team working and communication skills, flexibility and good organisation skills.

APPLICATION PROCESS AND REQUIREMENTS Application deadline: 30th May, 2015, 18:00 Jordan time (GMT+3) **Proposed interview dates:** 1st – 4th June, 2015

Bids must include the following:

- Proposal including, outline of evaluation framework and methods, including comments on the TOR, proposed time frame and work plan (bids over 3 pages will be automatically excluded).
- Proposed evaluation budget
- CVs and evidence of past evaluations for each team

member Submit completed bids to Hugh Earp

at hugh.earp@nrc.no.

11. ANNEX 1 – DETAILED QUESTIONS

Appropriateness

- What recommendations can be made to adjust the theory of change and improve the appropriateness and impact of the programme, given an increased understanding of the validity of the underlying assumptions?
- To what extent are the differing needs of the various sub-groups that the project serves (and especially women, girls, boys and men, or people with disabilities) taken into account, including both the need for shelter and need for information?
- Given the project design to move beneficiaries from one residence to another, how can the project be improved to maintain beneficiaries' abilities to access services?
- To what degree is the project designed and implemented based on the opinions and the participation of affected populations?
- To what extent can the programme be increased to a scale appropriate to match the needs of the context?

Coverage

- Are we reaching the right people? (See Annex 2)
 - Sub-question: what vulnerabilities in this context should qualify a person to be selected as a beneficiary?
- To what extent are the villages and towns selected for the programme the most appropriate geographical areas?

Efficiency and Effectiveness

- What is the added value of the integration of the ICLA component of the programme compared to a traditional stand-alone shelter programme?
- How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve synergy between NRC programmes?
- How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve value for money?
- To what extent does the response meet the adequate shelter needs, as intended, of the families it serves?
- To what extent does the response meet Syrians' needs for information and counselling with respect to accessing rights and services?

Impact

- What key consequences do beneficiaries feel they have obtained from the programme (positive and negative), disaggregated by male- and female-headed households?
- Which additional programming options might be used to complement or replace current programme design to improve effectiveness and impact?
- How does this programme affect tensions within communities?
- How can the programme be modified to mitigate the risks faced by vulnerable families reaching the end of their contract?
- What (anecdotal) evidence is there of the consequences resulting from the programme's effect on the rental market?
- To what extent does the programme feed into the longer-term Government of Jordan development strategy?

11. ANNEX 2 – ARE WE REACHING THE RIGHT PEOPLE – EXPLANATORY NOTE

Strategic Evaluation Question 2014

What is a strategic evaluation question and how will NRC use it?

On an annual basis, NRC identifies a priority question which is included in all evaluations. Questions have to be relevant to all areas of NRC's work and of strategic value to the organisation.

Evaluation team are asked to address this question within the evaluation report.

The evidence related to this question is collated from all evaluations on an annual basis. It is analysed and presented in NRC's Annual Learning Review. The review is widely disseminated to NRC staff. Findings and recommendations from this review feed into NRC's strategic mapping process which is subsequently used to identify priority areas for NRC's annual strategy meeting. The findings also directly feed into NRC country strategy processes, during which country directors are asked to reflect on learning from the review and identify follow up activities for their countries.

Prioritised Learning 2014:

The follow question has been identified for 2014 learning case studies.

1. Is NRC reaching the right people?

Definition of the question:

According to NRC's policy, NRC targets refugees and IDPs and displacement affected host communities. NRC will target assistance within communities to those who are most vulnerable and at highest risk. Specific focus is given to the protection of vulnerable groups and minorities, especially women and children. Within this group, vulnerability targeting depends on the specific intervention and context. Within each of NRC's core competencies, the programme policy outlines who the main target groups are and who is considered to be vulnerable in terms of access to specific services.

Evaluations should tackle this question in a way that is relevant to the programme which is being evaluated and the evaluation process. However, the question has been broken down into criteria below to help guide the evaluation team/evaluator in addressing the question:

1. NRC's has undertaken an assessment of the needs of affected populations and has identified vulnerable groups. This assessment was based on robust, relevant, reliable and timely **evidence**.
2. NRC has clearly defined who should be **targeted** through its programmes. This definition includes specific targets for different displacement affected populations, disaggregated targets for men, boys, women and girls, and clear vulnerability criteria.
3. NRC has carried out **selection processes** for participation in its programmes in line with the humanitarian principal of impartiality. The selection process avoids bias or exclusion.
4. NRC is working in **areas where the highest needs** have been identified. Where this is not possible due to access constraints, there is evidence that NRC is directly working to gain access. There is evidence that NRC is well co--ordinated and providing unique or complimentary services where they work.
5. NRC's programmes are **designed** in a way that enables access for their target groups, including the most vulnerable. There is evidence that NRC has been **effective** in reaching their targeted beneficiaries. This can be confirmed through monitoring data and triangulated with additional data collected during the evaluation. Is NRC tracking/verifying 'beneficiaries'?
6. The evaluation concludes that the initial targeting was **appropriate and relevant**, that those most in need were reached through the programme.

Good Practice Case Study

This is not compulsory. If good practice is identified which would be of relevance to other programmes or other country offices working on similar projects, please document these in the box below. NRC recommends the evaluator works directly with the programme manager to complete this.

This should be an annex to the main evaluation report and would highlight areas of good practice relating to targeting, selection processes, enhancing access through design or implementation or beneficiary verification exercises.

Annex 2 - List of stakeholders consulted

Date	Participant	Contact person	Location
23 August	NRC staff and M&E staff	Internal meeting	Amman
24 August	NRC Irbid field staff – Shelter and ICLA	Internal meeting	Irbid
25 August	DFID	Craig Tucker Rana Nassar	Amman
	UNHCR – Irbid	Katherine Dunn Fidaa	Amman
	NRC M&E staff	Internal meeting	Amman
26 August	NRC Shelter Team	Internal meeting	Irbid
	Habaca	Jaber Al Omari	Irbid
	Municipality of Jerash	Eng. Wafa Hawamdeh	Jerash
	Jerash community site visit	Site visit	Jerash
	Care International		Irbid
27 August	NRC staff – ICLA team NRC staff – Outreach team NRC staff – Drop in centre	Internal meeting	Irbid
	Beneficiaries – move in day observation	Site visit	Irbid
	Ministry of Public Works and Housing	Eng. Eman Obaidat	Amman
30 August	Landlord Developers	Focus group	Irbid
	Irbid Landlord	Focus group	Irbid
	Female Landlord (Reem)	Focus group	Irbid

	Tenant moved-in stayed	Focus group	Irbid
	Tenant moved-out	Focus group	Irbid
	Tenant left	Focus group	Irbid
	Tenant refused	Focus group	Irbid
31 August	Special needs Mixed	Focus group	Irbid
	Special needs Female	Focus group	Irbid
	Municipality Irbid (dept. Head of planning)	Eng. Monther Alattar	Irbid
	International Catholic Migration Commission	Hisham Ababneh	Irbid
	Host Community Representatives (Reem)	Focus group	Irbid
1 September	International Rescue Committee		Irbid
	Male landlords	Focus group	Jerash
	Female tenants	Focus group	Jerash
	Jordan community representatives	Focus group	Jerash
	Jerash community site visit	Focus group	Jerash
	Ajloun site visit and client interview	Site visit	Ajloun
	Syrian Host Community representatives	Focus group	Irbid
	NRC Staff – Social team	Internal meeting	Irbid
	NRC Staff – evaluation update	Internal meeting	Amman
2 September	UNHCR – Shelter Working Group	Mohamed Abdel-Al	Amman
	BPRM	Jack Hijazin Tim Swett	Amman
3 September	NRC Staff – Shelter PM	Internal meeting	Amman
	NRC Evaluation group – debrief	Internal meeting	Amman
6 September	NRC Staff – PD and M&E	Internal meeting	Amman
	AARD – Legal aid	Samar Muhareb	Amman

	USAID – urban programming	Heather Davenport	Amman
7 September	UN-Habitat	Iman Zakri	Phone
7 September	Justice Centre for Legal Aid		Irbid
8 September	Danish Refugee Council / Co-Chair of Protection Working Group	Jennifer Gulbrandson	Amman
8 September	Danish Refugee Council	Melissa Phillips	Amman

Annex 3 - Evaluation matrix

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
Appropriateness	1. What recommendations can be made to adjust the theory of change and improve the appropriateness and impact of the programme, given an increased understanding of the validity of the underlying assumptions?	<p>Evidence on how relevant the current theory of change is, and how it could be adjusted to improve the appropriateness and impact of the programme.</p> <p>Ensure consensus on the perception of the understanding of the validity of the underlying assumptions.</p>	<p>Participatory workshop with NRC staff (ICLA and Shelter, PM, PC, Officers, and field staff).</p> <p>Semi-structured interviews with other key stakeholders (incl. donors, partner organisations, sector working group and task force, government representatives, etc.).</p> <p>Beneficiary interviews or focus group discussions (landlords and Syrian refugees).</p>
	2. To what extent are the differing needs of the various sub-groups that the project serves (and especially women, girls, boys and men, or people with disabilities) taken into account, including both the need for shelter and need for information?	<p>Evidence from monitoring frameworks and reports on the effectiveness of programme in considering the different sub-groups.</p> <p>Evidence on the methodology used to develop the beneficiary assessment/prioritisation tool</p> <p>Evidence on the effectiveness of the beneficiary assessment tool and Shelter/ICLA databases, to respond to the need of the various groups.</p>	<p>Review of monitoring reports.</p> <p>Discussion/analysis with NRC Staff on the process used to develop the beneficiary assessment/prioritisation tool.</p> <p>Analysis of the beneficiary selection/prioritisation tool, and Shelter and ICLA databases</p> <p>Interview with sector working group and task force.</p> <p>Beneficiary focus group discussions, including</p>

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
			women only focus groups.
	3. Given the project design to move beneficiaries from one residence to another, how can the project be improved to maintain beneficiaries' abilities to access services?	<p>Evidence on how effectively the project maintains beneficiaries' access to services when they relocate.</p> <p>Define the minimum standard agreed in terms of access to services.</p>	<p>Monitoring data/report on levels of access to services (i.e. Non-acceptance participation report)</p> <p>Interviews with beneficiaries, NRC field staff and local government, and other key stakeholders.</p>
	4. To what degree is the project designed and implemented based on the opinions and the participation of affected populations? (reviewing assessment and outreach procedures)	<p>Evidence through factsheets and reports on the level of participation.</p> <p>Evidence on the methodology used to develop, design and implement the project, in terms of inclusiveness and transparency.</p> <p>Focus group consultations with Jordanian host community and Syrian refugee community representatives on participation / consultation in programme design stage.</p>	<p>Analysis of reports describing the level of participatory tools used during the design and implementation of the project</p> <p>Interviews with beneficiaries, NRC field staff and local government, and other key stakeholders (including discussions with NRC staff in drop-in center on the feedback mechanism)</p>

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
	5. To what extent can the programme be increased to a scale appropriate to match the needs of the context?	<p>Evidence on the contextual capacity to expand such project (E.g. # of unfinished units available in the areas of interventions)</p> <p>Evidence on NRC resources and capacity to scale up.</p> <p>Analysis on the other types of Shelter/ICLA assistance option available to scale up the programme.</p>	<p>Assessment data from the planning team (e.g. #of unfinished units available)</p> <p>Interview/Workshop with NRC staff on current capacity, workload, how to improve efficiency, and whether other types of assistance option would be relevant to this context.</p> <p>Review of findings from other evaluations (e.g. Lebanon NRC programme)</p>
Coverage	<p>6. Are we reaching the right people? (See Annex 2)</p> <p>Sub-question: what vulnerabilities in this context should qualify a person to be selected as a beneficiary?</p>	<p>Evidence on whether the targeted population is the most in need and is benefitting from the project.</p> <p>Evidence on the vulnerable population who are not part of the project (e.g. They do not fit the criteria, they do not wish to participate)</p> <p>Analysis on the beneficiary assessment tool and understand whether it has been well designed and adapted to the needs of the population.</p>	<p>Review of monitoring report and reports from feedback mechanism in place for the affected population.</p> <p>Review of sector guidelines on participatory approaches, vulnerability and prioritisation tools.</p> <p>Interviews with beneficiaries, NRC staff and local government, and other key stakeholders.</p>

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
	7. To what extent are the villages and towns selected for the programme the most appropriate geographical areas?	<p>Information on coordination between key stakeholders, including government, and other implementing agency.</p> <p>Evidence of the integration of the project in the government plan of geographical interventions.</p>	<p>Review of multi-sector assessments, 4W, maps and any other information developed by the sector working groups and task force.</p> <p>Interview with NRC CD, Government representative (Amman), Governorate representatives.</p> <p>Interview with Sector Working Group, task force representatives</p>
Efficiency and Effectiveness	8. What is the added value of the integration of the ICLA component of the programme compared to a traditional stand-alone shelter programme?	Evidence on the benefits and downfalls of the integrated programme (e.g. SWOT analysis)	<p>Participatory workshop with NRC staff on the strength and weaknesses of the integrated programme.</p> <p>Interview with beneficiary (landlord and refugees)</p>
	9. How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve synergy between NRC programmes?	<p>Analysis of the efficiency and effectiveness of the tools and systems in place to develop and design the project.</p> <p>Evidence of good practice for good integrated programming.</p>	<p>Interview/Workshop with NRC staff on the efficiency and effectiveness of the integrated programme. (e.g. Structure of the weekly meetings, databases, field staff reporting structure)</p> <p>Literature review on good practice for integrated programming.</p>

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
	10. How could the programme design and implementation – looking particularly at efficiency and effectiveness – be adjusted to improve value for money?	Evidence on the cost effectiveness of the programme, and understanding of the areas of potential improvement.	Interview with NRC staff (incl. finance team) on the potentials area of improvement for cost effectiveness and value for money.
	11. To what extent does the response meet the adequate shelter needs, as intended, of the families it serves?	<p>Evidence of success of the shelter aspect of the project based on the Macro Logframe (including. Tenure security, access to services and privacy)</p> <p>Satisfaction of beneficiaries post-implementation (including. Tenure security, access to services and privacy)</p>	<p>Review of the monitoring report of the project.</p> <p>Review of the feedback system from beneficiaries.</p> <p>Focus group discussion with beneficiaries including women only focus groups</p>
	12. To what extent does the response meet Syrians' needs for information and counselling with respect to accessing rights and services?	<p>Evidence of the success of the ICLA aspect of the project based on the Macro Logframe.</p> <p>Satisfaction of beneficiaries post-implementation (including. Tenure security, access to services and privacy)</p>	<p>Review of the monitoring report of the project.</p> <p>Review of the feedback system from beneficiaries.</p> <p>Focus group discussion with beneficiaries (including input from men, women, girls and boys) and including women only focus groups</p>

ISSUES	SUB-ISSUES	HOW THE JUDGEMENT IS FORMED	DATA COLLECTION METHOD
Impact	13. What key consequences do beneficiaries feel they have obtained from the programme (positive and negative), disaggregated by male and female-headed households?	<p>Evidence from feedback mechanisms, collected in database and reported on (focusing on the impact on women)</p> <p>Focus groups with landlords, tenants, users of other services (e.g. drop-in centre information and referral clients)</p>	<p>Review of Shelter/ICLA databases, and reports.</p> <p>Key informant/ focus group discussion with beneficiaries.</p> <p>Data available from feedback mechanisms (E.g. call center, drop-in center, and NRC field staff).</p>
	14. Which additional programming options might be used to complement or replace current programme design to improve effectiveness and impact?	<p>Perception of Shelter /ICLA PM, government and local authorities on alternative options.</p> <p>Literature review from other context on successful Shelter/ICLA Programme.</p>	<p>Interview/Workshop with NRC staff on the impact of the integrated programme.</p> <p>Focus groups with host community and Syrian refugee representatives.</p> <p>Consultations with other stakeholders – e.g. Shelter Working Group, Protection Working Group; Governorate representatives etc.</p>
	15. How does this programme affect tensions within communities?	<p>Evidence from feedback mechanism, discussion with community representatives, local government representatives.</p>	<p>Interview/Workshop with NRC staff on the impact of the integrated programme.</p> <p>Interview with beneficiaries, government, and other key stakeholders.</p> <p>Focus groups with host community and Syrian refugee community representatives.</p>

	<p>16. What (anecdotal) evidence is there of the consequences resulting from the programme's effect on the rental market?</p>	<p>Perception of affected population, hosting population, local government, and institutions such as Chamber of Commerce.</p>	<p>Interview with beneficiaries, NRC staff, government, and other key stakeholders (e.g. Chamber of commerce, Ministry of public works and housing, etc.).</p>
	<p>17. To what extent does the programme feed into the longer-term Government of Jordan development strategy?</p>	<p>Evidence of the programme fitting into the GoJ long term development strategy.</p>	<p>Review of the GoJ Response plan.</p>
<p>Sustainability</p>	<p>18. How can the programme be modified to mitigate the risks faced by vulnerable families reaching the end of their contract?</p>	<p>Evidence from monitoring and evaluation reporting on beneficiaries reaching the end of their contracts.</p> <p>Understanding the risks faced by families reaching the end of their contract</p>	<p>Review of reports (post-implementation monitoring) on the risks faced by families reaching the end of their contracts.</p> <p>Interview/Workshop with NRC staff on the sustainability of the integrated programme.</p> <p>Focus group discussion with beneficiaries (including input from men, women, girls and boys)</p>

	<p>19. What proportion of tenants terminate their leases early? What are reasons for early termination?</p>	<p>Evidence from monitoring team, and feedback mechanism.</p>	<p>Review reports, and interview monitoring team on reasons from lease termination.</p> <p>Focus group discussion with beneficiaries (including input from men, women, girls and boys)</p>
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Annex 4 - Discussion of the methodology and tools

The evaluation provides a response to the following lines of enquiry:

- To what extent does the programme ensure Syrians' right to adequate housing?
- To what extent does the programme contribute to Syrians' awareness and ability to access their rights?
- To what extent does the programme reduce Syrians' need to resort to negative coping mechanisms?

Additionally, the evaluation provides a response to NRC's annual evaluation question which is included in all evaluations. For this year, the question selected by NRC is 'Is NRC reaching the right people?'

Evaluation approach

The evaluation adopted a mixed methods approach, with a combination of qualitative and quantitative measures.

Key data sources included:

Data source	Structure	Comments
Desk review	Desk review of documents provided by NRC and through independent research. Documents included NRC and external research reports, NRC donor reports, team organograms, feedback and accountability complaints data.	
Focus Group Discussions and small key informant interviews	17 Focus Group Discussions were convened to obtain information from: Beneficiaries (tenants) - 9 Focus Groups Landlords – 5 Focus Groups Community representatives – 3 Focus Groups	Focus Groups were convened in Irbid and Jerash Governorates, and also included participants from Ajloun Governorate. These locations were selected as they are the sites where NRC is implementing the project. A semi-structured tool was developed, which provided a set of core questions. Further questions varied according to

Data source	Structure	Comments
	<p>The breakdown of the Focus Group topics follows this table.</p>	<p>the role of the respondent group.</p> <p>FG discussions invited 6-8 participants, but actual participants varied from 1 to 10.</p> <p>Each FG was designed to cover a range of key variables, including:</p> <ul style="list-style-type: none"> - A project location - A type of engagement with NRC - Gender <p>Some FGs were designated for female participants only, and others were designated as 'mixed' groups to ensure women could also participate in those groups if they attended.</p> <p>The FG participants for community representatives were invited by NRC staff in Irbid and by the municipality in Jerash (i.e. a non-random selection).</p> <p>Beneficiaries (landlords and tenants) were selected randomly from NRC's database records by NRC staff, according to the requirements of each FG (location, type of engagement, gender etc.). Where invitees</p>

Data source	Structure	Comments
		<p>could not be contacted or were unable to attend, additional beneficiaries were selected and invited.</p> <p>FGs were conducted by an evaluator paired with an NRC M&E staff member for translation. One FG for females was conducted by an NRC M&E staff member alone, due to a timetabling conflict with the female evaluator.</p> <p>FGs were held at NRC's office and Drop In Centre in Irbid, and at Local Government offices in Jerash where NRC has no suitable venue.</p>
Key informant interviews	<p>Semi-structured interviews were conducted with key informants, including:</p> <ul style="list-style-type: none"> • Government of Jordan representatives at central and Governorate level • Donors (BPRM, DFID, UNHCR) • INGO,NGO and CBO representatives • Shelter and Protection Working Group Chairs • NRC Shelter, ICLA, M&E and Management staff 	<p>Interviews with the Government of Jordan and the Justice Centre for Legal Aid were conducted with the assistance of a translator from NRC's M&E team.</p> <p>Other interviews were conducted by the evaluation team alone without translation.</p> <p>A list of meetings is included in the Annexes.</p>
NRC field staff	NRC Shelter and ICLA teams worked in small groups using the 'Most Significant	NRC staff were split into mixed groups, with each group

Data source	Structure	Comments
working groups	<p>Change' methodology to respond to the following questions:</p> <ul style="list-style-type: none"> • What is the most significant change in communities during the last 18 months? • What is the most significant change in communities attributable to the programme in the last 18 months? • What do you believe is the most significant change for landlords who have participated in this programme? • What do you believe is the most significant change for tenants who have participated in this programme? • What has been the most significant negative change attributable to the programme? 	<p>including shelter and ICLA team members.</p> <p>The small groups were facilitated by peers (e.g. senior assistants) to encourage free participation and reduce anxiety about participating in evaluation processes.</p> <p>The evaluators and NRC M&E provided a training session for the peer facilitators on the MSC methodology, and on NRC's approach to facilitating focus groups. The training session also finalise the exact Arabic wording of questions, to ensure consistent application.</p> <p>Once each team had completed their contributions, the results were collated and translated by the NRC M&E team and provided to the Shelter TL / POs and ICLA TL / POs for them to review and revise with their own inputs.</p> <p>The final contributions were provided to the Shelter PM and ICLA PCs for review and comment.</p>
Direct observation	<p>The evaluators:</p> <ul style="list-style-type: none"> • observed properties which had been completed in Jerash, Ajloun 	

Data source	Structure	Comments
	<p>and Irbid with NRC's assistance.</p> <ul style="list-style-type: none"> • Observed a 'moving in' day in Irbid, as several families moved into their matched shelter. • Visited NRC's offices in Amman and Irbid. • Visited NRC's drop in centre / telephone hotline in Irbid. • Reviewed a small random sample of ICLA files (5) 	
Data sharing and joint analysis sessions	Structured meetings took place between the evaluation team and NRC management, Shelter and ICLA teams to review and analyse information on an ongoing basis. This allowed for factual correction, and also provided direction in assessing the relative importance of issues, and prioritising which issues may require further investigation and substantiating.	

The Focus Group Discussions were comprised as follows: (note, mixed group denotes participation was open for women).

Location	Engagement with NRC Shelter / ICLA	Gender
Irbid	Beneficiary - Leaving early	Female
Irbid	Beneficiary - Leaving early	Male
Irbid	Beneficiary - Stayed after contract finished	Mixed
Irbid	Beneficiary - New move ins	Mixed
Irbid	Beneficiary - Refused property matching	Mixed
Irbid	Beneficiary - Drop in Centre users	Mixed
Jerash	Beneficiary - General	Female

Irbid	Beneficiary – special needs	Female
Irbid	Beneficiary – special needs	Mixed
Total 9 beneficiary (tenant) focus groups- (8 Irbid, 1 Jerash), (3 female, 1 male, 5 mixed)		
Irbid	Landlords	Mixed
Irbid	Landlords	Mixed
Irbid	Landlords	Female
Jerash	Landlords	Mixed
Jerash	'Developer' Landlords	Mixed
Total 5 landlords focus groups (3 Irbid, 2 Jerash), (4 mixed, 1 female only)		
Irbid	Jordanian host community	Mixed
Jerash	Jordanian host community	Mixed
Jerash	Syrian refugee community representatives	Mixed
Total 3 community focus groups (1 Jerash, 2 Irbid), (2 Jordan host, 1 Syrian), (3 mixed)		

Data Triangulation

Data was analysed and triangulated in several ways. An evaluation matrix was developed during the inception phase of the project, and reviewed and endorsed by NRC. The evaluation matrix is attached as an Annex to this report. Information from desk-based research and direct observation were recorded against the evaluation matrix questions that they related to, and incorporated directly into the responses contained in this evaluation report.

Focus Groups were conducted in Arabic, translated live with the assistance of an NRC M&E team member, and the responses were transcribed. The transcripts were then summarised into key issues, and the issues were mapped for each class of focus group respondent (e.g. the landlords responses were mapped together, the beneficiaries responses were mapped together and the community representatives responses were mapped together). Finally, the results were overlaid using a radar graph to simultaneously show the key issues raised by the different categories of focus groups. The radar graph, collated focus group issues and sample summarised issues from each focus group are attached as an annex.

NRC Shelter and ICLA frontline staff inputs were analysed and prioritised internally through a peer process. Initial inputs were suggested and prioritised within each mixed shelter and ICLA team. The results of this review were collated and reviewed by Team Leaders and Project Officers of each

team, who endorsed some ideas and substituted their own views for other questions. The prioritised selections were then reviewed by Shelter Project Management and ICLA's Project Coordinators. Samples of the collated frontline output and the prioritised Shelter and ICLA responses are attached as an annex.

The focus group responses are valid at the level of the focus group, rather than the level of the individual participant in the focus group. That is to say, as a qualitative tool, the focus groups will provide information on the group's overall position on a topic – whether the group raised an issue, whether the group agreed strongly or disagreed etc., and allow for exploration and understanding of issues. The focus group results are not valid as a form of mini-survey – i.e., 3 participants in Group 1 agreed, 6 participants in Group 2 agreed, for a total of 9 focus group members in agreement. With that caveat, the evaluation team as the FG enumerators did record majority and dissenting views where relevant.

Report finalisation

The consultants provided NRC with a draft evaluation report for comments and factual corrections. The draft report was provided to the NRC Evaluation Committee, and NRC provided responses which included factual corrections, supplementary data and opinions.

A feedback matrix was used to identify issues, accept or respond to feedback, and track amendments to the draft evaluation report. Factual corrections and updates to the draft report were made based on feedback from the Evaluation Committee, and differences of opinion were tracked and reconciled through the matrix.

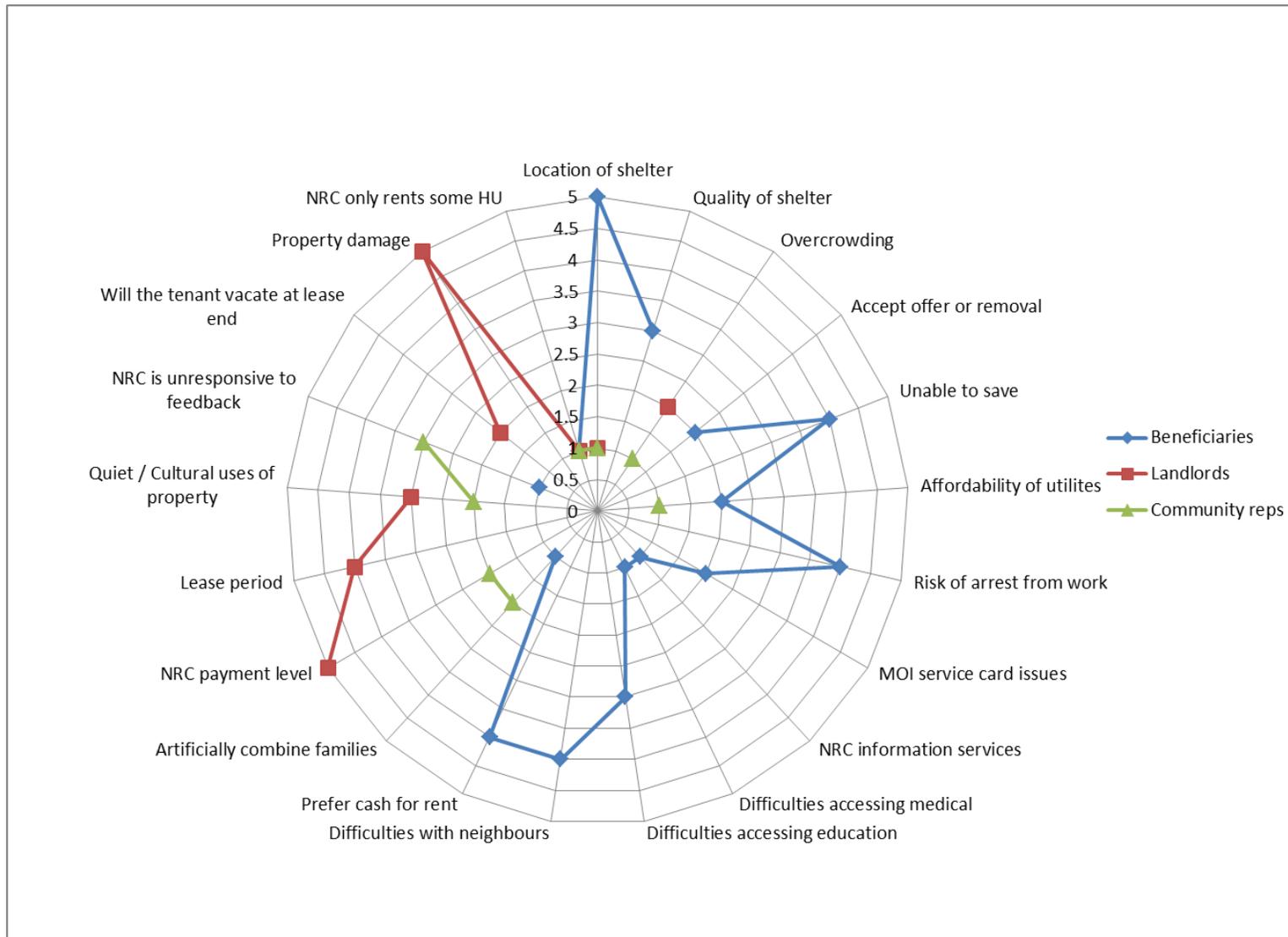
Annex 5 - Focus Group Discussion consolidated results

This annex includes an overall summary of the issues raised in focus groups by beneficiaries, landlords and community representatives.

It includes:

- (a) a radar graph, collating the issues for the three categories of respondents, and
- (b) Categorisation and collation of focus group issues per category of respondent.

(a) Issues summary: All focus group responses



Collated issues – Beneficiaries

	Leaving early 1	Leaving early 2	Stayed after contract	New tenants	Refused property	Drop in Centre users
Location	Irbid	Irbid	Irbid	Irbid	Irbid	Irbid
Participants	1 female head of household	2 males	3 (2 female, 1 male)	6 males	4 (2 female, 2 male)	5 males
Jordanian housing history	Left property early due to the distance from the house to Irbid city, and no work in the area of the house	6 houses in under 3 years; 4 houses in 2 years.		3 years, 4 previous houses; 2 years and 2 previous houses; 2 ³ / ₄ years, 5 houses; 2 years, 4 houses; 3 years, 2 houses previous, 3 years, 2 houses.	Now – 11 people paying 130 / month; 9 ppl and 100 JD per month; 8 ppl and 130 JD per month	

	Leaving early 1	Leaving early 2	Stayed after contract	New tenants	Refused property	Drop in Centre users
Matching process	Wanted a property closer to the city	House too remote; Wanted house but matched with apartment	2 good houses, 1 poor house (basement with no ventilation)	NRC lost application (1) Time on waiting list <6 months (4), 1 yr, 2 yrs	Refused the property because the house was very far, poor water service and unsafe neighbourhood. Property refused as unsuitable for disabled father and far from work. Property refused as house was small and beneficiaries must pay septic tank costs.	On waiting list for 18 months, 12 mths, over 12 mths, 5 months, refused as ineligible because family is too small (5 members) 2 respondents added family members to reach 9 members.
No of occupants NRC shelter	10 people in 3 HU	18 people, now rent privately with 8 people	9 people in 3 HU, previously 13 ppl in 2 HU	16 (3 HU), 14 (4 HU), 12 (4 HU), 6 (2 HU), 6, 12	Not applicable	Not applicable
Issues						
Location of NRC shelter	Issue raised	Issue raised	2 good, 1 poor location	4 good, 2 poor	Issue raised	

	Leaving early 1	Leaving early 2	Stayed after contract	New tenants	Refused property	Drop in Centre users
Quality of NRC shelter			2 good, 1 poor quality	4 good, 2 poor	Too small and poor Ventilation	
Overcrowding in NRC shelter						
Told to accept house offer or be removed from programme			Issue raised		Issue raised	
Inability to save during NRC housing period / depletion of savings	Issue raised	Issue raised	Issue raised	Issue raised	NA	
Affordability of utilities			Issue raised		Issue raised	
Risk of arrest during work	Issue raised	Issue raised		Issue raised		Issue raised
MOI service card issues		Issue raised		Issue raised		
NRC Information services		Issue raised				
Difficulties with access to medical services		Issue raised				
Difficulties with access to education		Issue raised		Issue raised	Issue raised	
Prefer cash for rent	Issue raised	Issue raised		Issue raised		Issue raised
Issues with neighbours			Issue raised	Issue raised	Issue raised	Issue raised

	Leaving early 1	Leaving early 2	Stayed after contract	New tenants	Refused property	Drop in Centre users
Combined families to reach 9 to qualify for assistance						Issue raised
NRC is unresponsive to feedback						Issue raised

Collated issues – Landlords

	Landlord FG 1	Landlord FG / interview 2	Female Landlords	Landlord	'Developer' Landlords
Location	Irbid	Irbid	Irbid	Jerash	Jerash
Participants	4 male, 1 female	1 male	5 females	7 males	3 males
No of houses in the NRC programme	1 house only	1 house only	All have multiple houses with NRC	4 have one house with NRC, 3 have multiple houses	All have multiple properties (12 properties, 4 with NRC; 14 properties, 4 with NRC; 12 properties, 7 with NRC)
Reason to join the programme	Construction had stalled and no money to continue (4) Decided to build now because of NRC assistance (1)	Construction had stalled and no money to complete	Help Syrian refugees Construction had stalled and no money to complete (2) Decided to build now because of NRC assistance (1)	Construction had stalled and no money to complete	For financial reasons – to benefit from the NRC support

	Landlord FG 1	Landlord FG / interview 2	Female Landlords	Landlord	'Developer' Landlords
Advancement of property completion	Several years (2-3 years)	More than 4-5 years	Would not complete without NRC assistance (2) 1-3 years (2)	General 2 years, but up to 6-9 years	Not given
Adequacy of NRC amount towards expected construction standard	Sufficient for basic needs, but not sufficient for normal use after the NRC lease. Only 1 landlord did not add extra funds from their own pocket.	Not enough to pay for the finishings	Needed to add between 600 – 900 JDs to complete. One landlady added 10,000 JDs for 3 floors.	Needed to add extra – 3,000 – 9,000 JDs. Some extra required for NRC's standards and some for additional quality of finishings.	Spent 150% more than NRC gave, due to the minimum standards being so low – e.g. NRC didn't require us to paint the walls
Plans for post-lease	Use property for family use (1), rent privately if no NRC extension (2)	Would like to extend with NRC.	Will rent privately if no lease extension from NRC	Will rent privately if no lease extension from NRC	Ideally would like to break the lease now (2) Will rent privately (2) Would rent to the Syrians for a rent increase (1)
Issues					
Will tenants vacate at the end of the lease?	Issue raised			Issue raised	

	Landlord FG 1	Landlord FG / interview 2	Female Landlords	Landlord	'Developer' Landlords
Damage to property (will there be damage, who will repair it?)	Issue raised	Issue raised	Issue raised	Issue raised	Issue raised
Quiet use of property (noise, use of balconies and roofs, spying) and cultural issues	Issue raised		Issue raised	Issue raised	
Overcrowding of property		Issue raised			Issue raised
Duration of contract is too short (should be more money for a longer period to match actual expenses)		Issue raised	Issue raised	Issue raised	Issue raised
Location of property (tenant quit property due to distance)				Issue raised (1)	
NRC only rents some HU in the property				Issue raised	Issue raised
Housing prices decreasing in rural areas					Issue raised

Collated issues – Community representatives

	Host Community	Host Community	Syrian representatives
Location	Irbid	Jerash	Jerash
Participants	5 (3 male, 2 female)	5 males plus 1 female local Govt convener	4 males
Involvement with the project	Initially very involved but then we have lost contact as NRC's work increased	Aware of the programme but no significant involvement	Aware of the programme but have not had significant direct involvement, except 1 representative helped with CDR.
Positives	<ul style="list-style-type: none"> Provide landlord with cash and Syrians with a house 		
Negatives	<ul style="list-style-type: none"> Community tensions are created by NGOs only supporting Syrians and not helping JD vulnerable family. People we considering the cash provided as a benchmark for rent – this has tripled the rent in certain area. NRC are not interested in us now they no longer need us. 	<ul style="list-style-type: none"> the amount paid to the landlord is not enough to cover the cost of finishing the building. In one area the rents are higher than another but NRC pays the same amount to both landlords? We have lots of ideas and feedback for NRC but no one ever asks us for them. 	<ul style="list-style-type: none"> NRC locks the doors on the bedrooms that it isn't using and on the extra bathroom, but this is a waste of space Combining people in the same property can cause problems. Even if it is two brothers and their families. The social team combines people into big groups so more people can be assisted but this is not ideal. NRC are unresponsive to feedback and do not make changes they promised.

	Host Community	Host Community	Syrian representatives
General	<ul style="list-style-type: none"> • Should have greater engagement with female religious leaders, they could work on overcoming the dispute – proactively, and reactively. • Should have greater engagement with CBOs – better communication, more involvement in assessments, identifying areas, avoiding problematic landlords etc. 	<ul style="list-style-type: none"> • Extra demand now on municipality services – water, waste collection, schools, education. It was limited before but worse now, with no extra funding. There has been a big loss of jobs in the area – from 12% to 18% unemployment. Some people say 22% unemployment. 	<ul style="list-style-type: none"> • Water and electricity is so cheap in Syria but so expensive in Jordan. • We have a lot of cultural differences – we mix a lot, we have parties and visitors late at night and Jordanians just don't do it, so there are issues. • why don't you give cash for rent direct to the landlord like they do in Syria?
Issues			
Overcrowding		Issue raised	
High utilities			Issue raised
Level of NRC payment	Issue raised (too high for rent)	Issue raise (too low for the cost of the rehabilitation)	
Different cultural uses of property (roofs, balconies)		Issue raised	Issue raised
Extra demand on services		Issue raised	
Artificial combination of families	Issue raised		Issue raised
Location of NRC houses (rural / remote areas)	Issue raised		

	Host Community	Host Community	Syrian representatives
NRC should be more engaged and responsive to the community	Issue raised	Issue raised	Issue raised
NRC locks toilets and rooms it is not renting			Issue raised

Annex 6 - NRC staff peer consultations consolidated results

Introduction:

The information below are the staff inputs for the participatory peer group work consultation of the evaluation. The NRC Shelter and ICLA staff formed mixed groups of 6-8 people and answered the following questions:

Q1: What is the most significant change in communities during the last 18 months?

Q2: What is the most significant change in communities attributable to the programme in the last 18 months?

Q3: What do you believe is the most significant change for landlords who have participated in this programme?

Q4: What do you believe is the most significant change for beneficiaries (shelter, ICLA) who have participated in this programme?

Q5: What has been the most significant negative change attributable to the programme?

Q6: What changes could be made to improve or strengthen the programme further?

ICLA Team Leaders and Project Officers Group feedback session

1. What is the most significant change in host communities and Syrian community during the last 18 months?

Answer	Reason for answer
1. Decrease of funds like cuts of WFP vouchers and other programs	Increase protection issues, other means of providing food or cash will increase
2. Change of regulations	Positive: two marriage exemptions, negative: stopped issuing bail-outs, MOI cards and UNHCR registration
3. Increase fraud and exploitation	Employers are exploiting refugees fake NGOs ask money for services

2. What is the most significant change in communities attributable to the NRC programme in the last 18 months years?

Answer	Reason for answer
1. Empowerment	Because NRC services empower service users dealing with landlords, obtaining legal documents (Approaching government)
2. Economic Cycle	NRC contributed to the economic cycle in Jordan by employments, rentals, office supplies, construction, Assets.
3. Improving relationship between host community and Syrian community	Because NRC provide shelter project, support the relationship between landlord and tenants encourages advocacy through international community and local partners.

3. What do you believe is the most significant change for landlords who have participated in this programme?

Answer	Reason for answer
1. Construction of unfinished houses	Providing the landlord with financial and technical assistance to finish their properties without facing any liability
2. Introducing collaborative dispute resolution methods	Addressing disputes between landlords and service users by providing trained staff to resolve the disputes using ADR (Alternative dispute resolution) in addition to merging the methods in the contracts.
3. Raised awareness	Providing landlords with HLP information clarifying the rights and obligation for each party in addition to clarifying technical issues (electric and water meters) and provide them with creative solutions such as dividing electricity and water bills

4. What do you believe is the most significant change for service users who have participated in this programme?

Answer	Reason for answer
1. Security of tenure	Providing service users with properties according to sphere standards with a valid lease protecting their HLP rights and explaining their obligations. which protects them from arbitrary evictions

Answer	Reason for answer
2. Raising awareness	Providing service users with information and counselling resulting in proper access to the sought services.
3. Empowerment	Identify all of the risks that the service users might face and tailor the service according to their needs while providing them with the detailed process in order for them to take the initiative and access to services by themselves

5. What has been the most significant negative change attributable to the programme?

Answer	Reason for answer
1. Forcing Syrian beneficiaries to merge their families to be included in the NRC program	Limited the individuals who are less than 9 to extend their numbers to be included in the shelter program
2. Moving people from one area to another	NRC provides shelter units to refugees in a different place than the place of residency which will cause limited access to services and protection concerns
3. Not setting standards for choosing landlords	Allocating a number of properties from the same landlord, giving them leverage and makes it hard for case managers to initiate negotiations for resolving any disputes. Moreover, not having landlords abide by the standard regulations of the program by installing shared septic tanks, electric and water meters which causes high bills almost as same as the rent of a property in the same area.

6. What changes could be made to improve or strengthen the programme further?

Answer	Reason for answer
1. Capacity building within and through-out the competency	NR staff does not fully understand what their colleagues do, especially between CC projects, in addition to the lack of coordination between teams.
2. Move-out allowance	Using the full potential of the contract, and decrease the amount of move-out disputes at the end of the contract, NRC will provide the service user the agreed upon move-out grant if the housing units did not require any repairs.
3. Frequent updated service mapping	Ensuring the quality of NRC services provided to service users

shelter Team Leaders and Project Officers Group feedback session

1. What is the most significant change in host communities and Syrian community during the last 18 months?

Answer	Reason for answer
4. Pressure on General Services	Since Jordan is suffering from the limited resources and by having big number of refugees that will increase the demand on many aspects such as the education quality, capacity of schools, also the infrastructure in Jordan cannot withstand the outcomes of the Syrian crisis, the Syrian families consume water in high quantities
5. They are more aware of the civil documentations issuing process	We have big number of beneficiaries who are reminded and being followed-up by NRC teams ensuring they know how and where to get the needed documents.
6. Lack of food assistance from WFP.	This action negatively reflected the Syrian refugees; it will lead to a decrease of food portions, also high demand on food items since the demand will increase

2. What is the most significant change in communities attributable to the NRC programme in the last 18 months years?

Answer	Reason for answer
1. Improve the standard of living in terms of food, health and education, because of not having the need of paying rent	Shelter program beneficiaries may spend the saved money improving their situations, decreasing the vulnerability within refugees.
2. Jordanian needy families benefit indirectly from the project through the low rents rate in some areas caused by the shelter project.	Supply and demand (More ready for rent apartments means less rent rate)
3. NRC shelter project motivates the industrial sector and adding new job opportunities for both Syrian and Jordanian labor.	This affects the Jordanian constructions market and will increase the opportunity for both the Jordanian and Syrian worker.

3. What do you believe is the most significant change for landlords who have participated in this programme?

Answer	Reason for answer
1. Finished their houses without taking loans from bank	People in general do not prefer dealing with banks, NRC provided financial support without any need of financial guarantee.
2. Speed up construction process	By providing landlords with installment amount, it speeds up investment process or personal use.

3. Most of the landlords changed their minds their thoughts about Syrian refugees (positive)	Increase in the social cohesion / Human values.
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4. What do you believe is the most significant change for beneficiaries who have participated in this programme?

Answer	Reason for answer
1. NRC shelters gives beneficiaries to focus on other things by saving rent money, like improving the food quality.	18 months of rent free helped refugees to improve the quality of food they buy and other aspects in their lives (important for their life needs)
2. Encourage Syrians to depend on themselves, with issuing their documents (marriage, birth etc.).	Through the support of ICLA staff, they insure that beneficiaries know how and where to get documents they need, making a room of self-dependency.
3. Improved awareness (merge of 2 answers)	Refugees know more about health services they could get, or knowing the procedure of getting the needed legal documents, also another aspect of increased awareness, they are less vulnerable when it comes to fraud.

5. What has been the most significant negative change attributable to the programme?

Answer	Reason for answer
1. Force some small families to merge into one large family so that they do register on the shelter program, as NRC do not register families under 9 individuals.	The average of Syrian families are 7 individuals and the available properties are big, refugees pretend that they live together but they don't.
2. If the water and electricity meters are shared between two apartments or more that will raise the bill amount.	Shared water and electricity meters may increase disputes between tenants themselves or with the landlord himself, also having a shared meter will increase the amount more than having separate meters, especially with landlords who have more than 1 property.
3. Frequent visits from the Norwegian Council to do different types of assessment reduced the credibility of the NRC.	Visiting the same refugee for many assessments needs will give false hope and lower NRC's credibility,

6. What changes could be made to improve or strengthen the programme further?

Answer	Reason for answer
1. Legal action for the landlord that exceeded the time limit for the house construction, normally he will have 2 months to finish the house.	Legal action must be implemented to avoid the uncollectable money whether it's a delay in constructions or for landlords who decline re-hosting beneficiaries again (for move-out properties)

Answer	Reason for answer
<p>2. ICLA team should pay more attention to the house state in general; tidy, clean, no writing on the walls, etc.</p>	<p>This may help in decreasing damages or unpaid bills. This is not only about services but also behavior, relationship, commitment from Syrian beneficiaries. Having ICLA to conduct more than a visit in 2 months.</p>
<p>3. The important thing is communication between all staff by doing regular team meeting for experiences exchange and to improve the projects.</p>	<p>More communication and coordination between teams to find solutions and improve the project</p>

Annex 7 - Evaluator biographies

Mark Aiken

Mark is a lawyer by background, with 20 years' professional experience. For the past ten years, he has worked on international justice and human rights assignments in the Middle East, Africa and Asia-Pacific. He has worked on projects for the United Nations, European Union, DFID and international NGOs.

He specialises in access to justice projects, and he has managed evaluations on legal rights projects in Afghanistan, Sierra Leone, South Sudan and Thailand.

Mark holds a Masters of Law and degrees in Economics and Law.

Caroline Dewast

Caroline originally trained and worked as an architect, before transitioning to work in the humanitarian sector. She has eight years' experience in shelter projects, including working as the Shelter Cluster Coordinator in Palestine and evaluating 14 DEC funded agencies on their Haiti disaster response. She has worked in Palestine, the Philippines, Cameroon, India, Kenya, Peru and the UK for organisations including UNHCR, IFRC and international NGOs.

Caroline holds a Masters in Development and Emergency Practice, in addition to a degree and post-graduate diplomas in architecture.