GLOBAL HUMANITARIAN CONSULTING

NORWEGIAN REFUGEE COUNCIL (NRC)

EXTERNAL FINAL EVALUATION

Empowering local responders and local protection networks to enhance capacity for self-protection of people on the move in key countries in Tunisia, Egypt, Libya

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1. **List of acronyms**

AIHR - Arab Institute for Human Rights

CBO - Community-Based Organization

DRC - Danish Refugee Council

EFRR - Egyptian Foundation for Refugee Rights

GIS - General Information Session

HMH - Human Mobility Hub

IOM - International Organization for Migration

ONM - Observatoire National de la Migration

PSS - Psycho-Social Support

PoMs - People on the Move

RLOs - Refugee-Led Organizations

RPE - Refugee Platform Egypt

StARS - St Andrew's Refugee Services

TAT - Terre d'Asile Tunisie

UNHCR - United Nations High Commissioner for Refugees

UNRN - United Refugee Network

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3. **Executive Summary**

The Human Mobility Hub (HMH) was established in January 2023 by the Norwegian Refugee Council (NRC) to bring together local partners, strengthen legal protection, and uphold the rights and dignity of people on the move. Acting as a regional platform, the HMH currently focuses on North Africa, where climate change, resource competition, and mixed migration dynamics create both transit and destination pressures. Through co-design and co-implementation with community actors, the Hub delivers context-specific, multidisciplinary responses that connect countries of origin, transit, and destination, promoting cross-border learning and collaboration. The project, "*Empowering Local Responders and Local Protection Networks to Enhance Capacity for Self-Protection of People on the Move in Key Countries in Tunisia, Egypt, Libya,*" foresaw HMH-led activities to be implemented in Tunisia and Egypt, while in Libya, NRC's Country Office delivered legal protection services, reflecting the distinct operational environment there. The project focused on empowering local responders and protection networks to enhance legal protection through local collaboration, co-design of interventions, capacity-sharing, and advocacy. Special attention was given to youth and unaccompanied minors, where appropriate, with a strong emphasis on community-based information dissemination to strengthen community protection mechanisms. The two-year pilot project included set-up activities for the HMH, with the goal of testing and refining its approach across Tunisia and Egypt, and in parallel, to continue the legal aid and documentation services and the piloting of financial legal assistance in Libya, through the NRC Libya country office. In the second year, these activities were consolidated and were carried out in partnership with community-rooted entities and partners for long-term sustainability.

This evaluation report assesses the project's performance across the Organization for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) criteria of relevance, coherence, effectiveness, efficiency, impact and sustainability. The evaluation provides a comprehensive analysis of the achievements, challenges, and lessons learned throughout the project's lifecycle. The insights gained from this evaluation will inform future programming within the three countries and guide the development of similar initiatives in the region.

Key conclusions

Relevance

The project demonstrated strong alignment with the needs and priorities of people on the move (PoM) across Tunisia, Egypt, and Libya. During the Sudanese and Gaza crises of 2023, the adaptive programming approach responded effectively to human mobility patterns in the region and changing political dynamics. The project's flexible structure allowed for targeted legal aid and protection services while maintaining coordination with key actors such as United Nations High Commissioner for Refugees (UNHCR), the Danish Refugee Council (DRC), International Organization for Migration (IOM), and national Bar Associations. However, the scale of interventions remained limited due to rapidly changing operational context and consequent related challenges. The project effectively adapted by partnering with organizations such as AIHR and Shams to continue capacity-sharing and legal advocacy efforts, but ongoing restrictions continue to limit outreach and service provision.

Effectiveness

The project successfully provided essential legal aid and capacity-sharing support, enabling local responders to address legal protection challenges. Outcome indicators exceeded expectations, particularly in Egypt, where partners managed to expand legal aid services despite increased demand. However, fostering long-term self-reliance remains a challenge due to political instability, project's duration and funding limitations. Overall, the latest available data confirm a clear trend towards exceeding planned targets, reflecting effective implementation and high engagement levels. In Libya, the financial legal assistance pilot proved highly effective in addressing documentation barriers, though outreach was constrained by security risks and limited NGO engagement. Within this project, the HMH effectively supported agility, accountability, and sustainability but faces systemic constraints within NRC's procedural framework and ECHO's IP and Local Partners requirements, and resource limitations. It demonstrated strengths in adaptive programming and partner-driven approaches while exposing areas for improvement in internal processes and long-term planning.

Efficiency

The partner-led model in Egypt and Tunisia proved cost-effective, while direct implementation in Libya ensured service continuity in a highly volatile context. NRC's ability to reallocate resources flexibly, such as expanding legal aid in Egypt in response to the refugee influx, enhanced operational efficiency. However, administrative bottlenecks, particularly in onboarding partners and navigating compliance requirements, delayed project implementation.

Sustainability

The project made progress in strengthening local capacities through training, knowledge-sharing, and legal aid networks, laying a foundation for sustainability. While some elements, such as financial legal assistance in Libya and community-based protection initiatives in Egypt, show promise for continued impact, their sustainability will depend on securing multi-year funding and fostering stronger institutional partnerships. The lack of an exit strategy in Libya highlights the need for contingency planning to ensure continued service provision in volatile contexts. However, overtime, the HMH has demonstrated increasing financial sustainability, growing its funding base from an initial €500K ECHO grant to over €4 million through diversified fundraising efforts. This has allowed for incremental partner support, particularly in Egypt. However, short-term funding cycles continue to threaten long-term sustainability, especially in Tunisia and Libya, where restrictive operating environments limit local actors' capacity to assume project responsibilities.

Impact

Key Achievements at a glance

- 2397 persons with increased/appropriate information on relevant rights and/or entitlements;
- 7 local partnerships established.
- The project contributed to notable short-term protection outcomes, evidenced by 2687 of beneficiaries successfully obtaining documentation or receiving legal counselling, as tracked by partner data
- Financial legal assistance in Libya, was highly effective in addressing immediate legal barriers.

However, systemic legal and policy changes remain limited, and measuring long-term impact is challenging due to political constraints. Strengthening monitoring frameworks and outcome-tracking mechanisms and approaches will be essential to better capture the project's broader contributions to protection environments.

Key recommendations

- It is recommended to keep carrying out continuous needs and risk assessments by conducting periodic mini-assessments or quarterly check-ins with beneficiaries to identify emerging challenges such as intercommunity tensions, new barriers to legal registration, other obstacles.
- Legal aid alone cannot address complex vulnerabilities, especially if local regulations restrict migrant rights:
    a. It is recommended that NRC and the HMH engage with ECHO to advocate for a more comprehensive service provision within the scope of the HIPs, eventually allowing to address the broader protection and support needs of beneficiaries.
    b. Develop partnerships with specialized local or international NGOs that can complement legal and capacity-building services and consider including sort of "add-on" service modules such as psychosocial support and GBV response needs.
- Keep focusing and investing on ongoing capacity-sharing processes by providing structured onboarding materials to help local organizations quickly meet NRC and donor requirements. Consider identify challenges, gaps and alternative approaches to allow for simplification of NRC's internal procedures, such as due diligence and partner agreement processes.
- It is recommended that NRC and the HMH engage with ECHO to lighten / simplify IP requirements and especially for local partners.
- In line with HMH strategy, work with local partners to create multi-year roadmaps for service continuity (e.g., post-project funding plans), so that the capacity built under the project is not lost at grant closure.
- In light of the factual concerns regarding the difficulty of tracking mobile populations, it is recommended that a 6–12-month monitoring framework for legal assistance beneficiaries be implemented using alternative approaches, such as frequent, focused, multi-channel data collection from a representative sample and process-oriented indicators (such as progress in legal navigation, self-advocacy, and partial achievements), to capture intermediate improvements when final outcomes are challenging to assess.
- In Libya, if context allows pair NRC staff with local volunteers / community leaders to start transitioning tasks, and transfer knowledge on compliance, case management, and fundraising, opening the door for local ownership once conditions allow.
- Develop a multi-year sustainability plan in each country, accompanied by a dedicated monitoring matrix to specifically measure partners' progress in assuming core project activities such as legal counselling, outreach, advocacy, resource mobilization, and service quality benchmarks.

4. Key Findings

Relevance

The project demonstrated **strong alignment** with the current needs and priorities of its target population - people on the move (PoM) across Tunisia, Egypt, and Libya. In a multifaceted environment marked by economic crises, shifting migration deals, growing xenophobia, ongoing instability, government-imposed restrictions, and protracted humanitarian crisis, the project remains highly relevant by delivering targeted support that responds to the urgent needs and vulnerabilities of these populations. The ***adaptive programming*** approach allowed for addressing critical gaps, especially within the shifting migratory and political landscape and was particularly effective in responding and adapting to the 2023 Sudanese and Gaza crisis and growing vulnerabilities. Coordination with international actors like UNHCR, DRC, Save the Children, and local Bar Associations helped the project align with existing humanitarian efforts and avoid duplications. Legal aid, capacity-sharing for local responders, and limited basic-needs support were generally well aligned with part of PoM's priorities, including documentation, protection from deportation, safe shelter, although the project could not meet all emerging needs with its relatively modest budget.

Alignment with evolving legal frameworks

In Tunisia, the civil society crackdown in April 2024 and a shifting legal and political environment, greatly challenged assistance and generally direct service delivery of one of the first HMH partners in country, Terre d'Asile Tunisie (TAT). The HMH adapted to emerging challenges by switching into partial remote management, keeping part of their staff on site and continued working with local partners like Arab Institute for Human Rights (AIHR) and Shams, engaged in legal advocacy implementing and in provision of services for marginalized groups (LGBTQI+ and undocumented migrants). In Egypt, project partners prepared for major regulatory changes, including a new law transferring refugee registration from UNHCR to the government. Rapid expansions (e.g., hiring additional lawyers in Aswan, supporting new MRLOs) ensured continuing legal services despite operational barriers. In Libya, where regulatory frameworks for non-Libyan populations are unsettled and formal protection mechanisms remain undeveloped, the project's flexible legal aid and financial support model is highly relevant given the high needs among non-Libyans and the lack of strong local organizations to support them and filled urgent gaps in legal assistance. Structural barriers (security risks, limited NGO presence, limited outreach) did not favour extensive engagement and its longer-term relevance will depend on expanding outreach and service diversification and adaptation.

Considering protection needs for vulnerable groups while providing legal aid

The project used legal clinics, paralegal training, and community-led awareness to reach unaccompanied minors, women, and other at-risk populations, leading to short-term protection outcomes (e.g., reduced risk of detention, higher documentation rates). Gaps remained in specialized services, such as psychosocial support (PSS), GBV case management, or comprehensive assistance for LGBTQI+, due to funding and expertise constraints.

Effectiveness

The flexibility to adapt activities to the changing operational context across target countries helped address urgent needs despite limited funding, time and bureaucratic difficulties. Across the three countries, the project demonstrated notable progress in reaching its intended beneficiaries. The project exceeded targets for legal counselling, with **2,687 individuals** receiving support across all countries (136% achievement). This demonstrates the significant demand for legal aid among beneficiaries. Partnerships were successfully established with **7 local organizations**, surpassing the target of 4 (150% achievement). This enabled broad outreach and enhanced service delivery. In Egypt, where activities were fully implemented, the project managed to exceed some targets; while, in Tunisia, presidential elections and civil society crackdowns (May 2024) forced a shift from direct legal aid (via TAT) to capacity-building and advocacy (via AIHR), and support to PoM networks (+LGBTQI+ legal aid) via Shams. Despite constraints, marginalized groups (LGBTQ+ migrants, undocumented individuals) still accessed crucial legal support. In Libya, activities effectively delivered legal aid (including a well-received financial legal assistance pilot) but narrowed primarily to Sudanese refugees after the 2023–24 crisis. In this multi-layered operational context, fostering long-term self-reliance remains a challenge due to short-term funding and multiple factors such the rapidly evolving needs, needs of further coordination and synergies with complementary services such as psychosocial and social support for GBV survivors, LGBTQ+ communities etc.

The project achieved its proposed intended objectives and outcomes in enhancing legal protection and building local capacity. Overall, 60% of the project indicators are above the expected value, demonstrating strong performance in many areas. 30 % of the indicators either not displaying their final value as final data have yet to be collected or activities are still ongoing, and 10% of the indicators are in line with the expected value, indicating consistent performance in those areas. It is relevant to mention that the analysed data do not represent the project's final state of the art, as there is outstanding partner data and late 2024 activities to be included in the MEL tracking tool. Indicator achievement levels differ significantly among the three

countries, reflecting unique operational and contextual challenges in Tunisia, a vaster service reach in Egypt - leading to overachievement in some areas.

Concerning currently under-target indicators:

- In Egypt, certain partners (such as RPE) have not yet submitted their final data, so any outcomes they achieved are not currently reflected in the tracking tool.
- In Tunisia, the suspension of TAT's activities, combined with missing data from other partner organizations, led to some indicators currently registering "0," as services were disrupted, and results still have to be shared by local partners and thoroughly analysed. Concerning HMH's internal effectiveness, although NRC's slow administrative processes and partner agreement complexities caused initial delays, frustrating local partners during the inception phase, the Hub's organizational structure largely supported agility, accountability, and sustainability. Nonetheless, it continued to face systemic constraints within NRC's broader framework, coupled with resource limitations, which limited its overall effectiveness. Partners noted a marked improvement in role clarity and monitoring procedures from 2023 to 2024. Approximately **75%** of partners report strong agreement on roles and objectives, enhancing accountability, while the remaining **25%** also agreed, though to a lesser extent.

Efficiency

Overall, the project demonstrated significant efforts to allocate and utilize financial and human resources efficiently, achieving its objectives despite several constraints. However, some areas revealed challenges linked to funding adequacy and the project's short timeframe, which limited its ability to fully optimize resources. Assessing the project's efficiency necessitates comparing HMH's partner-driven approach in Tunisia and Egypt with the direct-implementation model in Libya, as each method presents trade-offs in coverage, long-term sustainability, and operational risk. While the evaluation indicates that neither approach is universally superior; rather, the most suitable strategy is shaped by context-specific conditions, such as security constraints, legal registration requirements, donor priorities, and the availability of capable local actors. Nonetheless, findings suggest that integrating local partnerships can extend reach, reduce dependence on external teams, and support more sustainable outcomes over time.

In Egypt and Tunisia, working through established and emerging local organizations (CBOs, CSOs, MRLOs) significantly expanded the project's geographic and thematic reach. These partners' proximity to communities and familiarity with local contexts enabled a more nuanced response to diverse needs, including legal assistance, psychosocial referrals, and advocacy for marginalized groups. Although this approach required more complex oversight and compliance structures, it proved cost-effective and better aligned with the global shift toward localization, where local actors play a central role in humanitarian operations. Libya's security environment necessitated centralized coordination and an intentional low visibility and scalability-oriented approach to maintain service quality and overall security under volatile conditions. However, this structure raised operating costs (security, staff retention) and constrained expansion to new areas. Consequently, cost-per-beneficiary can be higher, and the project's long-term sustainability is tied to continued external investment rather than local structures. Findings indicate unmet needs in psychosocial support, GBV case management, and tailored services for marginalized groups (e.g., LGBTQI+). Neither direct nor partner-based models fully address these gaps, in part because such specialized services were beyond the original project scope but are still part of the comprehensive needs of PoMs.

Sustainability

Sustainability remains a significant challenge due to reliance on short-term humanitarian funding. Across all three countries, the lack of multi-year funding posed challenges to long-term planning, with recommendations for increased advocacy and resource mobilization to ensure continuity. Achieving long-term continuity will depend on multi-year funding and systemic changes within the partners' network. Undoubtedly, the capacity-building, knowledge-sharing, and community-led initiatives showed strong potential to persist beyond the project period, driven by local buy-in and integration into partners' core operations. The project empowered local partners such as Migrant and Refugee-Led Organizations (MRLOs) and community leaders, enabling them to lead training sessions and manage legal aid activities independently. In Libya, the current impossibility of partnering up with local civil society entities limited the development of a viable exit strategy, though NRC's pilot initiatives laid groundwork for future scalability. While community volunteers and local knowledge-sharing structures have improved, systemic barriers (legal restrictions, security risks) limit the establishment of a robust, locally embedded organization serving non-Libyans. Elements of the financial legal assistance pilot will be replicated in future programming and new proposals already reference the project's training and referral methodologies.

Impact

As a pilot, the project exceeded expectations by reaching more beneficiaries than anticipated, particularly responding to the Sudanese refugee crisis. The initiative created strong momentum for local partners, fostering collaboration through workshops and linking community networks. Partners valued NRC's mentoring and support, which enhanced their capacity to secure additional funding independently,

demonstrating the potential for scaling without losing the localized and community-driven nature of the interventions. Further, the project provided a model for legal support that empowered communities, particularly in cases where public attention ensured accountability. Publicized cases gave hope to communities by holding perpetrators accountable and offering redress to victims. This brought hope to project's participants, countering a prevailing culture where perpetrators often go unpunished, and victims are overlooked. Legal documentation and rights-awareness activities have contributed to enhanced individual protection capacities. However, the existing documentation does not fully evidence the systemic changes or long-term impacts, particularly the extent to which legal support translates into broader outcomes for beneficiaries. Capacity-sharing activities have strengthened local actors' ability to deliver protective services and navigate sudden inflows of migrants. This improvement in local capacities contributes to a more sustainable protection environment, though systemic barriers such as restrictive governmental regulations and funding constraints limit scalability. Financial legal assistance in Libya has proved to be scalable and replicable, setting a benchmark for addressing economic barriers to legal protection and has been highly effective in enabling beneficiaries to overcome immediate legal obstacles. Although beneficiaries felt well-informed, multiple external and systemic barriers prevented them from taking action on the information. Thus, the gap between knowledge and action remains a critical obstacle to achieving higher-level legal and protection outcomes.

5. Methodology

The evaluation methodology is based on the OECD and DAC evaluation criteria: **relevance, effectiveness, efficiency, impact** and **sustainability** in consistency the Terms of Reference (ToR). The methodology adopted for the project evaluation relied on secondary data from documentation and primary data collected through key informant interviews and focus groups discussions with a variety of stakeholders, such as the project team, consultants, project field partners etc. To carry out the external evaluation, the consultant adopted a participatory methodological approach divided in four phases:

(i) **inception**

(ii) **remote and on-site data collection in Amman, Jordan**.

(iii) **data processing and analysis.**

(iv) **reporting and dissemination**.

Figure 4 - Evaluation key stages

Phase 1: Inception - Literature review and initial consultation

In this first phase, the consultant began with a thorough literature review of secondary data. She reviewed all relevant documents related to the project, including previous reports, project documents, previous evaluations, and baseline data. This review provided an in-depth understanding of the project context, objectives, work plans, expected outcomes, and implementation methods. The review of secondary data offered cost-effective and timely background information and a historical perspective on the ECHO project. The document review encompassed the documents included as **Annex II**. This phase included as well scoping meetings with the project team (HMH team in Belgium, Tunisia, Egypt and NRC Libya), and the inception report drafting, sampling, design of data collection tools. These consultations provided information on the project's design, implementation, challenges encountered and preliminary results.

Informants sampling and selection

In conducting a comprehensive evaluation of the project, a detailed and structured participant sampling and selection strategy was employed, tailored to encompass a wide array of stakeholders involved in or affected by the project. This strategy was designed to ensure diverse and representative input from across all relevant groups, maximizing the span and depth of insights gathered during the review process. To facilitate the sampling process, the HMH team provided a preliminary list of interviewees based on their relevance and participation in the project. The selection criteria included the following:

1. **Relevance to the project**: Participants were selected based on their involvement and relevance to the ECHO project.

2. **Availability and willingness**: The availability and willingness of participants to partake in the study were crucial factors in their selection.

3. **Accessibility**: Participants needed to be accessible for interviews.

4. **Unique contribution**: The selection aimed to include participants who could offer a unique or innovative perspective on the project

The detailed list of key informants and corresponding data collection tools is included as Annex I.

Phase 2: Primary Data collection

The consultant adopted qualitative approaches as part of the primary data collection for each OECD DAC evaluation criterion, using the following collection tools:

1. Open (semi-structured) interviews with key informants: project staff, partners, ECHO staff
2. Focus group discussions (FGDs): project partners
3. On-site visit: Amman, Jordan, 2-5 December 2024

Phase 3: Data Processing and Analysis

The data processing phase involved several steps to ensure accuracy and reliability:

1. **Transcription**: All KIIs and FGDs were transcribed to capture detailed responses.
2. **Data Cleaning**: Questionnaire data were reviewed for completeness and consistency, with any discrepancies addressed.
3. **Coding**: Qualitative data from FGDs and KIIs were coded thematically using qualitative data analysis tools. This involved identifying key themes, patterns, and insights related to the evaluation questions.

The analysis phase was designed to triangulate data from multiple sources to provide a robust evaluation. The following methods were used:

1. **Thematic Analysis**: Qualitative data were analyzed thematically to identify common themes and insights within each OECD DAC criterion. This involved coding data into categories such as relevance, effectiveness, impact, and sustainability.
2. **Comparative Analysis**: Data were compared across different groups (e.g., Tunisia vs. Egypt, different types of activities) to identify patterns and differences in outcomes.
3. **Triangulation**: Findings were triangulated with quantitative data (outcome monitoring surveys, reports, etc.) to ensure validity and reliability, including cross-checking data from different sources and methods to confirm key findings. Where available, quantitative data collected by the project team has been integrated to validate and complement the qualitative findings.

The findings from the data analysis were synthesized into this comprehensive evaluation report.

Phase 4: Reporting and dissemination: Presentation of findings to NRC

The final crucial step in this methodology is communicating the results to relevant stakeholders. For the HMH ECHO project, the consultant has prepared a preliminary results presentation in PowerPoint format and arranged a debriefing meeting specifically for the project team and stakeholders.

6. Limitations and constraints of the research methodology

1. **Data Availability:**
   a) The data required for the assessment may not have been readily available (e.g. Libya as some project activities were still ongoing at the time the evaluation was conducted (e.g. legal financial assistance) the data were received by the consultant only 2 days before the submission.).
   b) Data was not final or complete (e.g., Echo Indicator tracking tool updated in September and currently missing data as some data indicators do not include the entirety of the project partners (e.g. RPE; AIHR) for a variety of reasons and thus not reflecting the actual project's progress.
2. **Changes in data collection approaches**: Initially, the evaluation plan included a beneficiary survey in Libya to assess the impact of the project on the ground. However, this survey was eventually not carried out, as the inclusion of third-party data collectors for onsite work was initially not foreseen and identifying it in a short-term would have not been possible.
3. **Respondents' Participation:** Some interviewees were unavailable or unresponsive during the evaluation process due to various reasons, including security concerns and annual leave.

7. Findings

7.1 RELEVANCE

EQ 1. To what extent did the HMH project align with the needs and priorities of the target population, including migrants, refugees, and internally displaced persons in Tunisia, Egypt, and Libya?

The project "Empowering local responders and local protection networks to enhance capacity for self-protection of people on the move in key countries in Tunisia, Egypt, Libya" demonstrated significant alignment with the needs and priorities of the target population, including migrants, refugees, and internally displaced persons, through adaptive programming and context-sensitive interventions. Its flexible, pilot-oriented design allowed adapting to rapidly changing context particularly the 2023 Sudan crisis, ensuring alignment with beneficiaries' needs. However, each country context reveals specific nuances in how the project fit into local type and scale of needs. From its inception, the project was deliberately kept flexible to allow rapid adjustments in response to dynamic migratory contexts. The project's flexibility allowed it to expand from legal aid to broader protection and basic needs support across Tunisia, Egypt, and Libya. However, it is relevant to consider that the scale of the project limited its ability to meet all identified needs, particularly amidst rapidly evolving crises in the region.

Tunisia

The project initially demonstrated strong alignment with the needs of migrants and refugees in Tunisia. In its early stages, Terre d'Asile Tunisie (TAT) served as a primary partner, operating in Sfax, Greater Tunis, and Medenine. Beyond legal aid and counselling, TAT's referral mechanisms and "*relais communautaire*" network offered a comprehensive package of services, ranging from social assistance (including cash assistance, housing, emergency support) to protection-related interventions such as eviction prevention and guidance on work opportunities. Over time, TAT recognized that some beneficiaries required social support even when they did not need legal services, reflecting the increasingly urgent shelter, food, and hygiene needs among incoming migrant populations. This adaptive approach underlines the project's continued effort towards relevance: as humanitarian gaps deepened, particularly in border areas like the northwest and Sfax, the scope naturally expanded beyond legal aid, affirming the adaptive capacity of HMH's approach prior to the crackdown.

> Before the May 2024 crackdown, NRC maintained a regular field presence and worked closely with TAT, conducting needs assessments and exploring cross-border legal aid (including case management support for people in their countries of origin), contingency planning, and capacity-sharing initiatives. Terre d'Asile Tunisie also addressed significant gaps in preventing statelessness and supporting with birth registration and provided legal counsel for asylum procedures. The field visits provided the Hub with direct insights into the challenges migrants faced.

> However, activities were interrupted in May 2024 due to civil society crackdowns and office raids, severely limiting outreach and leading to the interruption for TAT's activities, forcing the project to adapt significantly and severely constraining service delivery.

> This unforeseen interruption created a major gap and unaddressed needs, particularly in birth registration, broader legal support, and overall geographical and groups' reach. While the HMH attempted to continue these services through alternative pathways, intensified risks limited large-scale engagement with authorities. According to interviewees, these barriers limited the project's ability to fully match the escalating needs of incoming and undocumented migrants.

The project reoriented its focus on capacity-sharing for authorities and stakeholders by partnering with organizations like the Arab Institute for Human Rights (AIHR). During this period of significant legal challenges in Tunisia, including restrictive reforms targeting foreigners, AIHR capitalized on its established

relationships with authorities to address critical gaps by engaging with the Ministry of Social Affairs and the Observatoire National de la Migration (ONM) to provide technical expertise through workshops on laws affecting migrants, anti-trafficking, and protection mechanisms for people on the move (PoMs). AIHR also collaborated with the Tunisian Bar Association to establish legal units in underserved regions and mobilized community volunteers with the *Ligue Tunisienne des Droits de l'Homme*. In parallel, the project partnered with a small community-based organisation (CBO), Shams, maintaining its focus on marginalized groups, including LGBTQI+ communities and sub-Saharan migrants, who face systemic discrimination and legal vulnerabilities. Shams managed to maintain low-profile operations, providing critical legal aid to highly vulnerable individuals, including those facing detention or deportation. Through the project, the HMH reinforced local community representatives and paralegals, aligning with the practical realities of frequent border crossings (e.g., arrivals from Algeria) and fostered direct engagement with migrants lacking immediate legal support.

Egypt

The project's relevance in Egypt remains strong, particularly in its targeted response. However, given the vast and growing needs, its scale was initially limited. This gap was partially addressed through additional funding streams that enabled further expansion of services. Egypt has faced a significant surge in displaced populations due to crises like the Sudan conflict and the ongoing Gaza crisis, which have further intensified the vulnerabilities of people on the move. The project aligned with the evolving needs of migrants, refugees, and asylum seekers, many of whom face significant barriers to legal protection, documentation, and basic services.

Impact of crises and adaptation

The Sudan and Gaza crises increased demand significantly:

- The project adapted to the overwhelming influx of over 1.2 million Sudanese refugees to Egypt, 75% of whom women and children, led to increased demand for legal assistance, documentation support, and detention/deportation prevention demonstrating responsiveness to priority issues.
- Selected partners in Egypt namely, the St Andrew's Refugee Services (StARS) and the Egyptian Foundation for Refugee Rights (EFRR), and Refugee Platform Egypt (RPE) expanded geographically towards underserved areas in Aswan and the Delta region and evolved to address emerging needs and quickly adapted services to provide registration support, family reunification counselling, and representation for detained individuals.
- This responsiveness, particularly to the influx of unaccompanied children and people without valid residency, filled a critical gap given that many new arrivals faced long waits for UNHCR appointments and uncertain legal status.

> The project also collaborated with StARS' network of Migrant-/Refugee-Led Organizations (MRLOs), known as the United Refugee Network (URN), which comprises 23 RLOs. Through this partnership, the project bolstered paralegal capacity within MRLOs and community representative groups by providing capacity-sharing sessions focused on legal aid, safe and inclusive information-sharing, digital legal aid, and discrimination issues. In Egypt's restrictive environment, where larger INGOs face stringent legal and financial controls, the emphasis on grassroots organizations proved particularly a good fit: MRLOs' open-door policies and cultural affinities enabled more trusted and accessible engagement with refugee populations than traditional humanitarian actors could provide.

> As the project invested in training local actors, including community leaders and members, which interviewees described as "*very relevant and impactful*". However, they noted that additional awareness sessions (on topics beyond legal issues, such as Psychosocial Support (PSS) or GBV/GBViE) would further strengthen community-level capacity and better address the multifaceted needs of new arrivals. While advocacy activities did exist under other NRC-led or partner initiatives, interviewees felt that a dedicated advocacy track should have been more explicitly integrated into the HMH project for Egypt. They noted that robust advocacy at local, national, or policy level could have boosted the project's capacity to influence legal and administrative frameworks especially regarding residency, detention, and deportation issues.

Additionally, the KOBLI digital legal aid platform further expanded access to legal assistance for MRLOs and their partners.

Libya

The intervention's relevance in Libya was rated highly due to its alignment with the urgent legal and protection needs of non-Libyan populations. By focusing on rights-based documentation, housing rights, and access to services, the project addressed core issues faced by displaced communities. Similarly to Egypt, the intervention confirms its value in terms of its targeted response, though in terms of scale, and could better include a GBV, PSS and protection lens. A central component of the project in Libya involved piloting financial legal aid, wherein NRC covered legal and administrative fees. According to interviewees, this pilot filled a significant gap by removing cost barriers that frequently prevented displaced persons from obtaining documentation. Internal monitoring data showed that beneficiaries who received financial support could more readily process birth certificates, consular ID documents, and passport renewals, being particularly beneficial for families with young children, many of whom risked statelessness due to incomplete registration. The flexibility of ECHO funding enabled the reallocation of resources to hire additional protection officers, ensuring the project could adapt to emerging needs and maintain relevance to the context.

Adaptation to the surge of Sudanese refugees

Initially, the project was designed to support a balanced range of nationalities, ensuring equitable access to legal aid and protection services. However, the significant increase in Sudanese refugees in 2023–2024 shifted the focus of activities disproportionately toward this group. The project successfully adjusted to the influx of Sudanese refugees by prioritizing their urgent needs. Legal aid and protection services were tailored to address documentation issues, family reunifications, and access to essential services, demonstrating responsiveness to the immediate crisis. While the focus on Sudanese refugees was necessary and justified, it limited the project's ability to address protection gaps for other vulnerable nationalities, such as Ethiopians and Eritreans. A planned pilot initiative to provide legal aid through embassy collaborations was deprioritized due to the focus on Sudanese refugees.

EQ 2. How relevant were the project's objectives in responding to the evolving legal and regulatory frameworks in the three countries, especially given the challenges faced by people on the move?

The project's objectives were highly relevant to the evolving legal and regulatory challenges faced by people on the move in Tunisia, Egypt, and Libya.

Tunisia

In Tunisia, while the focus on legal protection, advocacy, and capacity building addressed critical gaps, operational constraints limited the project's ability to fully adapt to changing frameworks. Until April 2024, Terre d'Asile Tunisie (TAT), one of the Hub's earliest and most comprehensive partners, was central to providing both legal and social services. TAT's extensive coverage and ties with local authorities in areas like Sfax enabled the project to tackle birth registration, statelessness prevention, and other pressing needs, thanks to an active referral mechanism and capacity to engage with multiple stakeholders.

➔ Following the April–May 2024 crackdown, however, TAT's direct legal aid activities were suspended, forcing the HMH to reorient its approach. Efforts to maintain services such as birth registration became complicated and risky, prompting the project to rely more on other partners, notably Shams and the Arab Institute for Human Rights (AIHR). These organizations could not replicate TAT's scale of work but continued providing discreet legal aid and training for vulnerable groups such as LGBTQ+ individuals and undocumented migrants, alongside advocacy and policy dialogue to address gaps in national migration laws. This shift was further reinforced by partner recommendations not to engage in additional legal aid until after the October 2024 presidential elections, when government priorities might become clearer. At the same time, certain local actors expressed concern that enhanced collaboration with international partners, including the HMH, might draw additional scrutiny under counterterrorism and money-laundering legislation (Law 26 of 2015). By moving from direct service delivery to more indirect strategies, the project retained a degree of legal aid capacity for the most vulnerable groups, advocacy and capacity sharing. Nevertheless, the crackdown and TAT's suspension left a significant gap in comprehensive legal aid, and the lack of a central-level engagement with authorities further constrained large-scale support for birth registration and similar needs.

Egypt

Egyptian partners unanimously reported that the project could "adapt rapidly," as service demands surged (due to the Sudanese refugee influx). The project demonstrated strong adaptability to Egypt's evolving legal environment shaped by a forthcoming law transferring responsibility for registering new arrivals from UNHCR to the Egyptian government, which will introduce significant challenges for migrants already registered with UNHCR and for those navigating the legal and administrative processes for the first time.

To prepare for this transition, the project has focused on aligning its activities with the new regulatory landscape. Future initiatives are planned to raise awareness among affected populations, enabling them to navigate these changes effectively. HMH's support to partners will favour closer coordination with government authorities, helping maintain operational space and acceptance under the emerging framework, while continuing to advocate for the rights of people on the move. The project's expansion to underserved regions such as Aswan, the Delta, and the North Coast, hiring additional lawyers, and enhancing referral systems allowed the project to address legal documentation needs, prevent deportations, and support family reunifications. Partners confirmed that the large number of clients and the geographic spread of their needs meant that service delivery required significant logistical effort.

Libya

Operating in **Libya**, where national legal frameworks effectively criminalize irregular migration and formal protection systems remain largely undeveloped, has made addressing the needs of non-Libyan populations particularly challenging. These challenges include restricted access, limited protection-oriented policies, and the lack of capacity among local and international actors to deliver comprehensive legal and protection services. The project made efforts to mitigate these gaps through targeted interventions like financial legal aid, counselling and information session and by coordinating with protection actors, systemic barriers remain a significant obstacle for actors working in Libya with those target groups. The project effectively adapted to the context and emerging needs, such as shifting its focus primarily to Sudanese refugees when their influx increased. **However**, this limited opportunities to work with other nationalities, which was part of the original plan. The financial legal aid component was particularly relevant, as they addressed critical barriers faced by beneficiaries in securing documentation, including high costs, logistical hurdles, and the unavailability of services. For instance, the absence of a registry department at the Sudanese Embassy previously hindered individuals from obtaining essential documents such as birth certificates. The recent establishment of this service at the embassy represents progress; however, unclear processes continue to complicate documentation efforts. While the project engaged with embassies, particularly the Sudanese Embassy, this was primarily at an operational level, and further engagement and collaboration will likely be required to address these challenges in the future.

EQ 3. Did the project effectively address the protection gaps identified for vulnerable groups, such as unaccompanied minors, women, and marginalized communities and un(der)documented individuals?

The project made significant progress in addressing protection gaps for vulnerable groups, particularly through legal aid and community-driven approaches. However, systemic challenges, internal limitations, and coordination gaps affected the project's ability to comprehensively meet the diverse needs of unaccompanied minors, women, marginalized communities, and undocumented individuals, as the project focused on co-design, capacity-sharing, and knowledge exchange with local partners and people on the move. This approach aimed at fostering more equitable partnerships, build local ownership, and expand refugee and migrant participation at all stages of the response, an essential foundation for addressing the broader, escalating needs over time. The project achieved localized impact by collaborating with local partners to provide immediate protection and relief through different activities and services.

In **Egypt,** with 75% of the Sudanese refugee influx being women and children, the project's focus on legal aid and partnerships was crucial for addressing specific protection needs.

The project effectively integrated family reunification assessments into legal procedures, ensuring that UAMs were referred to appropriate legal aid programs and received support for submitting applications. Legal aid services expanded geographically to underserved areas like Aswan, the Delta, and the North Coast, enabling broader access to protection services for a wider range of vulnerable individuals. Partners played a key role in training local lawyers and enhancing advocacy efforts to address systemic gaps in legal protection. Refugee legal officers managed an emergency response clinic, ensuring that UAMs were referred for assistance. The project successfully addressed legal protection needs by equipping lawyers and MRLOs with the skills to provide legal aid and navigate Egypt's complex legal framework. Refugee legal officers managed emergency response clinics for legal services, ensuring crucial legal support for vulnerable populations. This focus helped mitigate immediate vulnerabilities, such as a lack of awareness about legal rights and the risk of deportation.

Challenges emerged in reaching some target groups, particularly in Cairo and Aswan, due to contextual barriers. In Aswan, the challenging local situation and fear stemming from new laws discouraged participation.

Similarly, in Cairo, government monitoring of refugee and migrant community gatherings made it difficult to organize in-person capacity-building activities. Despite these obstacles, efforts to provide training on legal aspects were impactful, though community leaders expressed the need for additional skills related to detention and protection for vulnerable groups.

The project recognized gaps in addressing protection needs beyond legal services: **->** Stakeholders noted that frontline lawyers frequently witnessed severe

violations but lacked the means to fully support survivors, raising concerns about burnout. They recommended integrating psychosocial support (PSS) for victims, particularly regarding LGBT and GBV issues, as well as stronger digital security measures and advocacy to combat hate speech and online harassment. Recognizing these gaps, the project invited an external service provider to deliver a psychosocial support session during the December workshop, an initiative aimed at addressing burnout among frontline staff and enhancing advocacy to better safeguard refugees' and migrants' rights.

In **Libya**, financial legal assistance addressed critical needs for non-Libyans, increasing their protection. The staff acknowledged the need of further considering protection related risks when organising community-based information sessions. Nevertheless, the team confirmed proactive engagement with other organisations like DRC and participation in local protection task forces, which helped identify and respond to protection gaps for vulnerable individuals and the recruitment of a protection officer in mid-2024 enhanced coordination with the protection task force and led to direct assistance for around 20 cases. The ECHO funding allowed modifying the project budget to better respond to protection needs and allocating resources to properly respond to protection issues, which resulted in the hiring a new protection officer.

 GBV-related issues, including sexual violence, emerged as critical protection gaps, with numerous cases reported by non-Libyans through the project's hotline and complaint mechanisms. While flagged cases were referred to specialized actors, NRC's ability to respond was constrained by the absence of in-house GBV expertise and the limited availability of GBV-focused organizations in the region. These challenges underscored the need for targeted interventions and enhanced coordination to address the pressing needs of survivors effectively.

To navigate these challenges, the project adopted an indirect approach to GBV: rather than acting as a direct protection actor, it aimed to enhance legal aid access for organizations already addressing GBV issues. This approach recognized the essential role of legal protection within broader survivor support systems. However, it fell short in addressing the immediate and multifaceted needs of survivors, particularly given the scarcity of specialized resources in Libya. The project also leveraged its protection officer to provide immediate psychological first aid to survivors and train staff on basic response protocols. Efforts were made to establish connections with other GBV actors in Libya, but the extremely limited number of specialized organizations hindered effective coordination and the development of robust referral pathways.

In **Tunisia**, the project initially offered a wider range of protection services through TAT, going beyond legal aid to include elements of social and psychological support. This approach aimed to address critical needs for unaccompanied minors, undocumented individuals, and other vulnerable groups. However, when TAT ceased activities following the April–May 2024 crackdown, these broader services largely disappeared, leaving gaps in psychosocial support and social assistance.

 While smaller organizations like Shams continued to provide targeted help for their specific communities (such as LGBTQ+ migrants), the project was unable to sustain the more comprehensive coverage planned for later phases. As a result, psychosocial and social needs went under addressed post-crackdown, reflecting the shift from an initially holistic model to a narrower focus on discrete legal

The project struggled to address intercommunity tensions and the psychological and social needs of marginalized groups, according to partners. Notably, LGBTQI+ groups faced significant challenges, including a lack of security, limited legal and social knowledge, and an absence of contextual understanding of their unique vulnerabilities. Feedback from partners concerning the specific gaps referred, for example, to the absence of assistance for victims of employer violence, who were left without support to recover or secure alternative employment or to the broader needs for emotional support and social reintegration. Furthermore, partners mentioned that the UNHCR's inability to effectively address these issues often left individuals without adequate guidance or recognition of their orientation and rights.

EQ 4. How well did the project's interventions fit within the broader humanitarian context and the priorities of local stakeholders and partners?

The project effectively aligned its interventions with the broader humanitarian context and the priorities of local stakeholders and partners, ensuring a context-driven and collaborative approach. HMH's interventions were strategically guided by regular coordination with a wide range of actors such as IOM, UNHCR, DRC and local partners, enabling it to align effectively with both immediate local needs and broader humanitarian priorities. However, continuous changes in the political landscape, particularly in Tunisia, posed challenges to maintaining alignment.

In Tunisia, the absence of a national asylum framework created significant challenges to align the project's intervention with both local and international priorities. This challenge was further compounded by recent

shifts in the local and national administrations' approach to migration, which made consistent alignment even more difficult. Despite these obstacles, the project played a crucial role as a *trait d'union* with immediate emergency needs with longer-term structural interventions led by larger actors such as UNHCR and IOM. TAT played a key role in engaging with local authorities, particularly in Sfax, to deliver essential legal and social support to people on the move. However, interviewees mentioned that the HMH's limited engagement with Tunisian authorities prior to the government crackdown weakened its operational relevance in an increasingly politically sensitive environment. Without established relationships with key stakeholders, such as the Ministry of Social Affairs, the HMH lacked critical advocacy channels to support its partners or influence government policies during the crisis. Anyways, when the presidency later centralized oversight of migration policy and civil society operations, advocacy channels like those through the Ministry of Social Affairs lost much of their influence. This made it difficult even for major external actors, including the EU, to effectively engage with the authorities. The project maintained regular coordination with partners such as DRC and Save the Children through monthly meetings. These efforts helped ensure alignment with the broader humanitarian framework, even amidst a challenging and rapidly changing context.

In **Egypt**, ensuring alignment with local priorities required close collaboration with authorities, particularly to facilitate partner registration and maintain operational access. This ongoing engagement was essential to navigating the country's regulatory framework and adapting to the needs of people on the move. These partnerships facilitated a cohesive response to the challenges faced by vulnerable populations, ensuring that interventions were both contextually relevant and operationally feasible.

In **Libya**, the project coordinated closely with other protection actors to make legal aid accessible, such as DRC and UNHCR. Despite being in a highly challenging operational environment. The lack of a robust local civil society or Libyan National Organization capable of assisting non-Libyan populations remains a significant barrier to sustainable coordination and limits the project's ability to foster a long-term, localized response. An officer recruited in mid-2024 began coordinating with the protection task force led by UNHCR, focusing on protection needs assessments.

7.2 EFFECTIVENESS

EQ 5. *To what extent has the project achieved its intended objectives and outcomes, particularly in enhancing legal protection, building local capacity, and fostering self-reliance among people on the move?*

The project has made significant progress in achieving its intended objectives and outcomes: overall, there is a clear trend towards exceeding planned targets, reflecting effective implementation and high engagement levels. The project adapted flexibly to meet emerging needs, despite challenges posed by evolving operating environments, funding limitations and bureaucratic lengthy procedures.

Figure 2 provides an overview of the achievement rates for the seven result indicators in the project. All indicator values presented in the figure below are based on data available up to September 2024 and as such, do not capture fully the project's final state of the art. It is anticipated that the unmet targets, particularly those related to information assistance, will be achieved once additional data from partner reports are received and incorporated into the final assessment.

The indicators measure progress on various project outcomes, such as the number of people informed, partnerships established, legal assistance provided, and capacity-building efforts. The project intervention logic revolves around 3 Specific Objectives Indicators and 7 Results Indicators, (custom and ECHO mandatory indicators). Most

Figure 5 - indicators' level of achievement

indicators are measurable, with clear outputs (e.g., the number of persons receiving financial legal assistance) and outcomes (e.g., % of beneficiaries reached who report usefulness of support). Based on the information and feedback collected and analysed, the project shows the following progress in terms of effectiveness, as shown in figure 1 on the side:

- 60% of the project indicators are above the expected value, demonstrating strong performance in many areas.
- 30 % of the indicators either not displaying reflect their final value as final data have yet to be collected or analysed. Nevertheless, indicator 1 and 7 have reached almost their target, with
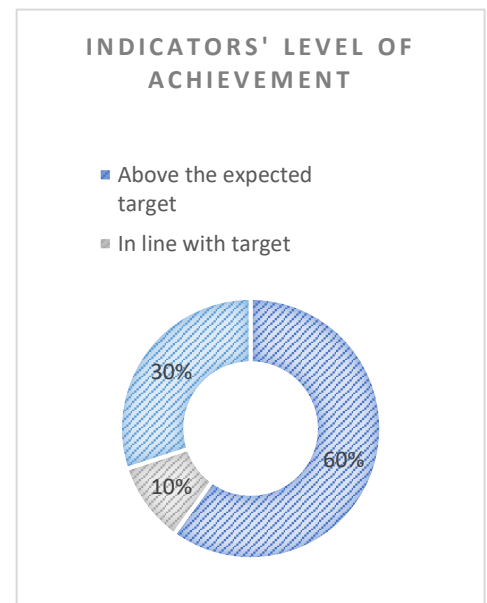
respectively 91 and 92% of current value. NRC expects to reach all expected targets upon reception of partners' reports.

- 10% of the indicators are in line with the expected value, indicating consistent performance in those areas.
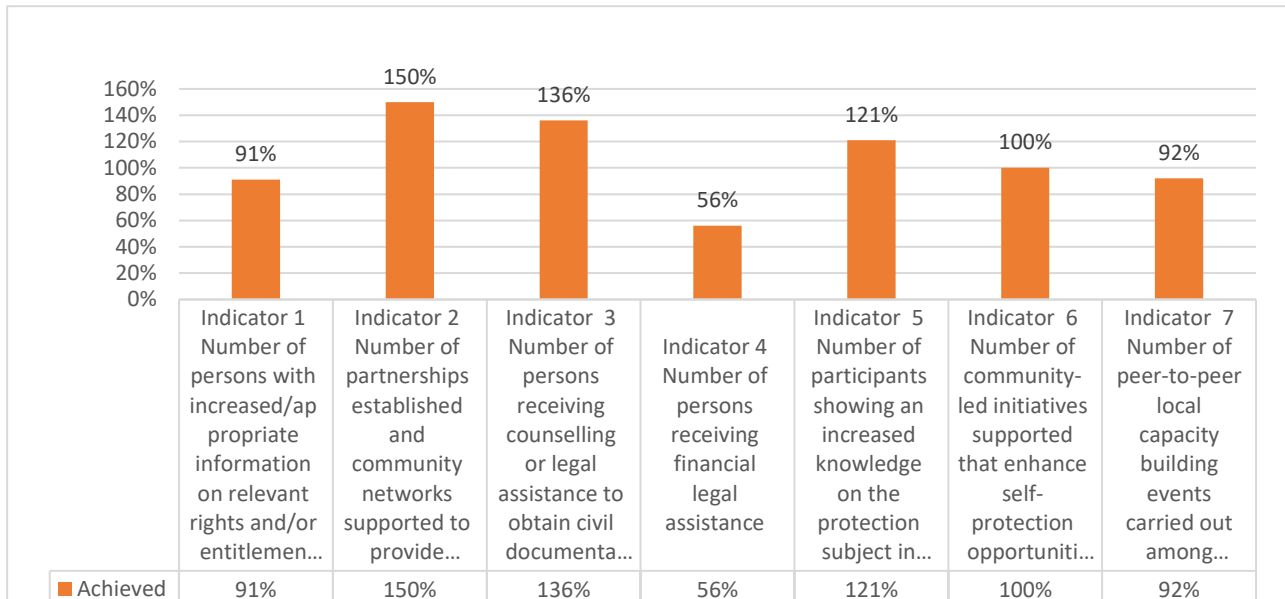

Achieved	Indicator 1 Number of persons with increased/appropriate information on relevant rights and/or entitlemen...	Indicator 2 Number of partnerships established and community networks supported to provide...	Indicator 3 Number of persons receiving counselling or legal assistance to obtain civil documenta...	Indicator 4 Number of persons receiving financial legal assistance	Indicator 5 Number of participants showing an increased knowledge on the protection subject in...	Indicator 6 Number of community-led initiatives supported that enhance self-protection opportuniti...	Indicator 7 Number of peer-to-peer local capacity building events carried out among...
Achieved	91%	150%	136%	56%	121%	100%	92%

Figure 6 - result indicators analysis

Figure 3 provides an overview of the results' indicators level of achievement, showing positive trends of overachievements of targets overtime:

- The overachievement in partnership building (Indicator 2) highlights the project's strong focus on maintaining and strengthening partnerships with local actors and networks, including StARS, URN, EFRR, Refugee Platform in Egypt, TAT, AIHR and a small-community based organisation in Tunisia.
- The high performance in legal assistance (Indicator 3) and knowledge-building (Indicator 5) underscores the project's effectiveness in addressing immediate protection needs and building the capacity of beneficiaries and local actors. Indicator 3 show a distribution of these beneficiaries demonstrates a strong focus on Egypt.
- The 56% achievement for Indicator 4 reflects some challenges that hindered target achievement gaps in reaching all foreseen individuals for the financial legal assistance (FLA). While highly successful with the Sudanese embassy, efforts to expand to other nationalities were limited due to non-functional embassies, lack of official representation, and resource constraints. Internal delays in recruiting legal consultants and legal team gaps further impacted implementation. Additionally, Libya's liquidity crisis complicated reimbursements, slowing case processing. Given these constraints, FLA will continue until March 2025, with a primary focus on Sudanese beneficiaries, as they stand to benefit the most from securing passports and legal documents for employment, healthcare, and education.

EQ 6. *Were the activities implemented as planned and did they reach the intended beneficiaries, including marginalized groups such as undocumented people, LGBTQ+ individuals and those in remote areas?*

Across the three countries, the project demonstrated notable progress in reaching its intended beneficiaries, with significant achievements in Egypt, where activities were fully implemented, exceeding some targets. However, deviations occurred due to the above-mentioned challenges lead to necessary adjustments and programmatic changes that required strategic adaptations to ensure its effectiveness and reach, as described below. Across the three countries, NRC's internal processes for finalizing agreements, recruitments were defined as "very slow", causing initial delays in project implementation. Partners expressed frustration with the administrative burden and bureaucracy.

Tunisia

In Tunisia, the abrupt crackdown on civil society by the Tunisian authorities in mid-2024 and the suspension of TAT's operations forced a shift away from direct legal aid, resulting in fewer beneficiaries than originally anticipated. The project adapted by emphasizing capacity-building and advocacy through partners like AIHR

and Shams, but this turn inevitably reduced the overall reach of planned activities. The project demonstrated adaptability by forging new partnerships to maintain critical support for people on the move.

Partnership with AIHR

The collaboration with AIHR planned to establish community-based (para-)legal aid networks in the western border areas. As the restriction from local authorities arose, their actions focused on capacity-sharing with local stakeholders, including authorities, lawyers, and civil society actors. In March 2024, AIHR and NRC conducted capacity-sharing sessions in Kasserine, Kef, and Gafsa, targeting organizations such as the Tunisian Order of Lawyers, Tunisian Red Crescent, and Tunisian League for the Defense of Human Rights. These sessions aimed to enhance local actors' understanding of migration issues and equip them with tools to address the needs of marginalized groups. AIHR also played a role in advancing advocacy efforts, working on legal and policy frameworks that impact people on the move. Their work included facilitating discussions with the National Migration Observatory and other governmental bodies, as well as preparing policy briefs to offer technical recommendations for legislative reforms. This adaptation allowed the project to shift from direct service provision to a focus on capacity building and advocacy, leveraging on AIHR's established expertise and relationships to navigate the challenging environment.

Partnership with Shams/CBO

The project also engaged Shams, which specializes in supporting LGBTQ+ migrants and refugees, a particularly marginalized group in Tunisia. Through this partnership, HMH provided legal support and facilitated strategy, communication, and advocacy capacity-sharing. Shams utilized this support to address urgent needs, such as assisting LGBTQ+ individuals with migration cases, digital safety measures, and referrals to legal and health services. Despite the hardships and security risks, including the inability of beneficiaries to report attacks due to fear of prosecution and hostility from authorities, the partnership achieved notable impacts. For example, Shams helped community leaders handle cases independently and supported members in obtaining UNHCR migration papers to leave the country. Shams also ran a social media campaign to raise awareness and counter hate campaigns aimed at their community. According to partner feedback, community leaders benefited from legal training initiatives, which empowered them to share knowledge within their networks and secure safe passage for transgender individuals, as well as support lesbian mothers and their children. An anonymous hotline further improved access to legal services and communication among community members, authorities, and service providers, bolstering both physical and digital security and especially for Sub-Saharan LGBTQ+ individuals. The project also strengthened ties with key institutions, establishing agreements with UNHCR and local health organizations. Despite these achievements, challenges remained. Shams frequently operated independently in high-risk situations, such as relocating at-risk individuals, due to limited external support. Additionally, the HMH mobilized a legal aid network of volunteer lawyers and local organizations, which provided critical support to partners facing harassment and arrests, enabled the continuation of limited legal protection services, particularly for vulnerable groups such as LGBTQ+ individuals.

The data also reveals relevant observations concerning the project's effectiveness:

1. Digital safety emerged as a critical issue in Tunisia, particularly for the Sub-Saharan LGBTQ+ community, where unsafe online platforms posed significant risks to beneficiaries' privacy and security. While some digital safety measures were implemented, they were deemed insufficient, highlighting a gap in the project's ability to protect sensitive data and ensure secure communication. From May 2024 onward, NRC introduced additional digital safety guidelines for its partners, aiming to mitigate these risks and enhance the security of both beneficiaries and implementing organizations.

2. The UNHCR's limited responsiveness, combined with its eventual withdrawal from Tunisia, severely impacted the project. Beneficiaries reported waiting up to six years for asylum applications, leaving them without legal recourse or adequate protections. This institutional gap further strained the capacity of local actors like Shams.

3. The absence of pre-existing contingency plans and dedicated resources initially resulted in a slower response, leaving partners vulnerable during the early stages of the crackdown. However, contingency planning was subsequently developed in collaboration with partners, as NRC the HMH had to create these plans from scratch due to the lack of internal resources allocated for such measures. To address this gap, NRC incorporated contingency planning into partner workshop sessions and has committed to making it a key objective for the HMH network in the coming year.

The evaluation highlights unresolved tensions among Sub-Saharan communities in Tunisia, where pre-existing racial and inter-community conflicts were not fully addressed. While Shams worked to build trust and mitigate conflicts, these challenges demand longer-term engagement and broader stakeholder collaboration. In response, the project planned a dedicated session for December 2024 to further explore and address these issues.

Libya

The activities in Libya effectively delivered essential legal aid services to non-Libyan populations, including refugees, asylum seekers, and migrants. The intervention encompassed information dissemination, awareness raising, counselling, legal advice, and assistance with essential services, housing rights, and financial legal aid, despite operating in a challenging environment. Findings indicate that:

1. The pilot of financial legal assistance was particularly successful (reaching an 100% success rate among beneficiaries), enabling PoM to overcome liquidity barriers that previously limited their access to essential documentation and housing rights. **->** Based on the success of this pilot, financial legal assistance was integrated into subsequent project activities, indicating the initiative's effectiveness and alignment with beneficiary needs.

2. The project initially aimed to support a diverse range of nationalities but shifted its focus to meet the urgent needs of Sudanese refugees following the crisis in 2023–2024.This shift limited the project's opportunities for learning and scalability, particularly in addressing diverse beneficiary profile's ability to address the needs of other nationalities, such as Ethiopians and Eritreans, who also face severe barriers to protection. Consequently, the planned pilot initiatives to collaborate with embassies for legal aid targeting non-Sudanese groups had to be deprioritized.

3. The development of Standard Operating Procedures (SOPs) for financial legal assistance marked a systematic approach to implementation, with plans to further refine these tools through consultations with team members and beneficiaries. While the intervention achieved notable positive results, the data revealed some challenges as well that impacted implementation:

4. The project faced significant challenges with liquidity during the implementation of financial legal assistance activities. To address these issues, legal consultants were engaged, but they also encountered difficulties due to liquidity constraints. This led to a burdening process that required reinvestment through external transfers and accounts in Tunisia. While embassies provided official receipts for documentation, strict financial controls and justifications imposed additional administrative burdens on the project. The liquidity issue led in turn to a high turnover among community volunteers, driven by a lack of consistent remuneration, which created gaps in service delivery, especially in terms of outreach. Training new volunteers was time-intensive and delayed programmatic continuity.

5. Access to services for non-Libyan communities faced several challenges during the project lifespan. Initially, a location accessible by public transport was established, facilitating easier access for non-Libyan beneficiaries. However, this location was later relocated to Syahiya near the NRC office, which reduced accessibility for some communities. The project also required regular security approvals from NRC and coordination with local authorities, necessitating continuous justification of activities. To minimize risks and ensure the safety of beneficiaries, outreach activities were scaled back, and the project increasingly relied on community volunteers to disseminate information and services. Door-to-door outreach, which could have addressed the specific needs of vulnerable individuals, was deemed too risky and was not implemented, further limiting access for non-Libyan communities.

6. In Libya, the project's initial pilot phase struggled with limited participant numbers and significant timing delays during the first year. Subsequently, in the second year, the team replaced the financial legal aid approach with cash for protection, drawing from the Danish Refugee Council's previously successful implementation of a similar strategy.

7. Delays in recruiting consultant lawyers, caused by internal procurement challenges, made the timely provision of legal assistance and counselling for complex cases very difficult. This issue persisted for years but was resolved mid-2024 with the hiring of dedicated consultants.

8. The counselling and legal assistance activity monitoring revealed that a significant number of individuals could not issue documents due to service unavailability and financial constraints. A major barrier for this issue was the unavailability of certain services within the country. For instance, the Sudanese Embassy lacked a registry department for vital records like birth certificates, providing only passport services. Although this service was introduced last year, unclear processing procedures continue to hinder effective legal assistance. The team mentioned that increasing engagement with embassies was highlighted as a potential solution, but this remains an ongoing challenge.

9. Efforts to organize community-based information sessions were hindered by the heightened risk of targeting non-Libyan populations.

Egypt

Overall, the project demonstrated a high degree of effectiveness in implementing planned activities and adapting them to evolving contexts.

1. Core services such as legal aid, protection, emergency assistance, and awareness sessions were largely delivered as intended, while strategic shifts allowed for geographical expansion beyond the

capital city, successfully reaching various target groups, including refugees, migrants, and other underserved populations.

2. Challenges persisted, primarily due to the volume and complexity of needs among recent arrivals. As mentioned by interviewees the project to go "*further than expected*" in terms of reach to respond to a sharp increase in service requests. This adaptation was mentioned as a logistical and financial challenge for partners, due to limited resources and required significant travel to reach underserved areas.

3. One challenge highlighted was the complexity of addressing multiple needs simultaneously, ranging from providing basic material assistance (e.g., food baskets and cash transfers) to offering educational and empowerment programs that foster self-sufficiency. Partners mentioned as well that operating in Aswan proved particularly difficult due to new local laws that raised security concerns, causing people to fear travel as well as issues with poisoned water, exacerbating health and logistical challenges. Similarly, gathering beneficiaries in Cairo was described as "tricky" by the other partners, since refugee and migrant groups are wary of being monitored by the government.

4. Risk assessments were conducted in advance to allow proper planning for on-site activities, but the realities of heightened surveillance and safety threats led to delays in rolling out in-person capacity-building sessions. Despite these obstacles, local organizations adapted effectively, within their possibilities.

5. One of the most notable achievements acknowledged by stakeholders was the effective collaboration among project partners, CBOs, and local organizations, as this decentralized network allowed for a responsive service model, whereby beneficiaries were referred to closer service points, reducing travel risks. Capacity-building initiatives, particularly those led or supported by NRC, helped local organizations bolster their financial and administrative management skills. This, in turn, improved the sustainability of refugee-led organizations by enhancing their ability to secure new funding streams. Meanwhile, specialized trainings in protection risk management and teaching skills further contributed to overall project efficacy.

EQ 7. How effective is the current organizational structure of HMH in supporting agility, accountability, and sustainability in its operations?

HMH's organizational structure reflects a balance of strengths and areas for improvement in its efforts to maintain agility, accountability, and sustainability. While the structure enables collaboration and adaptability in many aspects, certain constraints within NRC's broader framework and resource limitations, present challenges to fully achieving HMH's potential. The hub has effectively cultivated partnerships, benefiting from NRC's regional expertise and contributing to co-created interventions with migrant-led organizations, working towards localized and sustainable programming.

HMH's strategic relevance in Tunisia and Egypt has positioned it as a key player in the humanitarian space, providing timely support where it was lacking. Its rapid expansion and ability to form new partnerships underscore a high degree of adaptability. Close coordination with NRC offices in the Middle East and Libya has enabled HMH to draw on specialized expertise in legal aid and capacity-sharing. This integration has proven valuable, as evidenced by partnerships formed in both Egypt and Tunisia, which were established ahead of schedule to fill critical gaps for donors seeking flexible, partner-driven solutions. HMH's swift response to the Sudan crisis in Egypt and internal crisis in Tunisia also highlighted its agility in addressing emerging needs on short notice.

Partners welcomed HMH's constant communication, shared values, and readiness to co-design interventions and that, beyond funding, organizations value open channels for communication, discussing challenges as well as progress as a very collaborative way of working, clarifying project requirements and aligning strategic objectives.

Partners appreciated HMH's constant effort for accountable decision-making, as interventions were adjusted in line with real-time feedback from stakeholders on the ground.

Agility

The HMH partnership demonstrated significant agility in refining working arrangements, openly addressing challenges, and collectively resolving issues: **a strength consistently acknowledged by partners**.

> Feedback highlights the tension between HMH's partnership-driven model and NRC's rigorous operational procedures, which often **delayed agreements** and **hindered responsiveness**. These processes, designed to ensure compliance, were particularly challenging for smaller, grassroots organizations, which struggled to navigate complex financial and administrative protocols. Funding transfer delays were significantly exacerbated by the Gaza conflict, as intermediary banks, particularly those based in the United States, initiated increased investigations and heightened scrutiny of transactions. This issue affected the project's operations across all countries. HMH's unique structure required staff to adapt NRC's standard practices to better support grassroots organizations, particularly refugee-led groups with limited formal systems. Interviewees emphasized the need for more flexible funding mechanisms to avoid excluding these organizations, which are often best positioned to deliver localized, impactful services.

Internally, the HMH developed contingency plans in response to early warning signs, which facilitated rapid adaptation once the crackdown began. In Egypt, the project's start-up faced strict controls on financial transfers and limitations on partnership scope. Despite these constraints, HMH leveraged low-visibility operations, pre-existing partnerships, and minimal in-country staff to navigate regulatory hurdles and deliver services. For instance, it reallocated resources to address the influx of Sudanese refugees, collaborating with local organizations to expand geographic reach and tailor support for new arrivals.
In Tunisia, the 2024 government crackdown necessitated a suspension of partner activities and a shift to remote operations. NRC adapted by renegotiating strategies and implementing indirect capacity-sharing with local partners after direct legal aid became unfeasible, allowing the project to maintain partial continuity through low-profile operations, despite a highly restrictive environment.

Accountability

While looking at the comparison between the 2023 and 2024 partners workshop survey's findings, these highlights a significant improvement in the perception of clarity of roles, responsibilities, and accountability within the HMH project. In 2023, it was recommended to ensure roles and responsibilities around implementation are clearly defined and to establish a system for regular follow-up to monitor progress and swiftly address challenges. mechanisms. By 2024, the feedback reflected notable progress, with partners unanimously acknowledging that the clarity of roles, objectives, and accountability partnerships had significantly improved. Specifically, partners reported a notable improvement in output monitoring arrangements, indicating that the previously identified gaps had been addressed effectively.
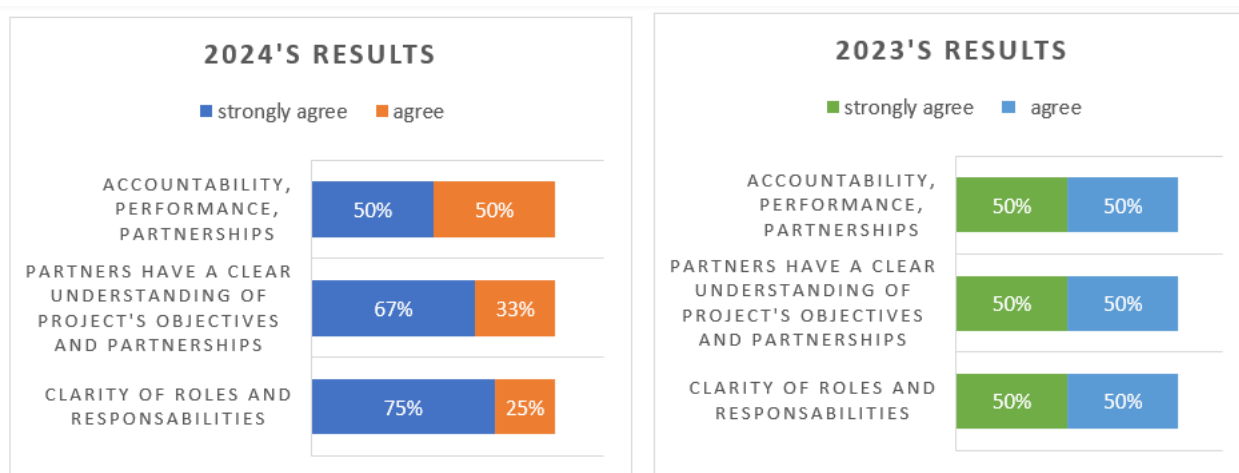
Figures 4 and 5 - Workshop results comparison 2023-2024

Key takeaways

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Shift From donor-oriented to community-oriented

- Initially, HMH's approach felt more like "ready-made solutions" than codesigned interventions
- Over time, HMH placed **greater emphasis on community-based organizations (CBOs) and refugee leadership**
- Partners appreciated the **increased involvement of people with lived experiences**, though more effort is needed to deepen local ownership

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Communication channels

- Some partners liked the **flexibility** of HMH's informal communication
- Others wanted **structured guidance** and **clearer formal agreements**
- In Tunisia, staff support on security risks and digital surveillance was seen as **inconsistent**, suggesting a need for clearer protocols

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Sustainability

The sustainability of the HMH reflects a complex interaction of achievements and ongoing challenges, as highlighted by the findings from the 2024 partners' workshop and additional data. While the project has made significant advances in fostering sustainable practices through capacity-sharing, localized approaches, and strategic partnerships, key systemic and contextual issues continue to impact its ability to deliver enduring outcomes.

Efforts to promote sustainability were evident in HMH's support for structured capacity-sharing initiatives:

- Notably, Refugee Platform Egypt (RPE) transitioned from a volunteer-based organization to a structured entity capable of managing complex cases, underscoring the impact of targeted investments in capacity-building.
- HMH's collaboration with well-established actors like StARS and other community-based organizations cultivated a strong support network, integrating local knowledge and resources to enhance resilience in volatile contexts.
- HMH's efforts to foster more equitable partnerships are commendable, yet there is a need to refine NRC's overall localization strategies: while HMH's inclusive and participatory methods have helped build trust, the findings show that existing procedures continue to pose challenges for grassroots organizations, particularly those led by refugees, in accessing funding and technical support. The evolving model remains positively perceived, but its long-term impact will depend on aligning HMH's commitment to inclusive, local leadership with NRC's institutional requirements.
- Ongoing adjustments to internal processes, along with a focus on adapting NRC's broader framework, are highlighted as crucial steps for HMH to fully achieve its vision of sustainable, locally driven partnerships.

In terms of challenges, partners frequently cited **internal organisational and efficiency-related aspects**: **lengthy approval** processes; **funding-related issues** (reliance on short-term funding) as major barriers to fostering long-term organizational stability.

Emergency funding cycles, while enabling HMH to respond **flexibly** to crises, hindered partners' ability to plan strategically. For many, these cycles created a **dependency** on **unpredictable financial streams**, complicating efforts to sustain programs and expand their impact and **limited institutional and programmatic growth**, making it difficult for organizations to establish lasting frameworks for action.

EQ 8. How well has HMH adapted to recent regulatory changes in Egypt and Tunisia that affect people on the move? Have the strategies employed been effective in ensuring continued alignment with legal requirements?

The HMH demonstrated effective adaptation to recent regulatory changes in Egypt and Tunisia by leveraging local partnerships and employing context-specific strategies. However, legal limitations in both countries highlight the need for continuous adaptation and enhanced advocacy efforts to sustain alignment with evolving legal frameworks.

In **Egypt,** project partners have demonstrated considerable adaptability in addressing shifting regulations and political sensitivities. Drawing on regular context analyses, they have proactively adapted their activities.

A forthcoming Egyptian law will place the registration of newcomers under government oversight, effectively transforming the current system that relies on UNHCR for refugee status determination, bringing new administrative demands and closer engagement with government entities. Recognizing the anticipated challenges of the new law, HMH worked with partners to initiate awareness campaigns on the implications of regulatory changes and steps migrants should take to ensure compliance. Referral systems were introduced to minimize detention risks, ensuring accessibility to services without exposing beneficiaries to legal vulnerabilities. Other initiatives to further adapt to the upcoming changing context were the following:

- HMH supported partners, including EFRR and StARS, with legal training for lawyers to prepare them for the evolving registration system. This capacity-building effort ensured that local partners were equipped to address gaps caused by changes in regulatory frameworks.
- HMH and its partners liaised with Egyptian authorities to maintain operational access and prepare for future collaboration under the new system. This engagement helped sustain alignment with emerging legal requirements.
- Following the Sudanese refugee crisis, HMH quickly hired lawyers in Aswan and intensified missions to respond to the increased need for legal assistance and protection services.

In **Tunisia**, restrictive government policies and rhetoric targeting migrants, along with proposed legal reforms aimed at limiting Sub-Saharan arrivals, required substantial adaptation from the HMH.

Following TAT's suspension of activities, the HMH liaised with AIHR and community-based organizations like Shams:

Initially, AIHR planned to establish community-based (para-)legal aid networks in the western border areas.

However, these planned activities were subsequently not allowed by local authorities, necessitating a strategic shift of the project's intervention approach.

Eventually, AIHR facilitated capacity-sharing sessions in Kasserine, Kef, and Gafsa with key stakeholders, including the Tunisian Order of Lawyers, the Tunisian Red Crescent, and the Tunisian League for the Defense of Human Rights as well as engaging with the government, including the Observatoire National de la Migration, to influence policy discussions on the protection of people on the move. This included workshops on proposed laws addressing migration and human trafficking. Additionally, AIHR engaged with governmental entities such as the Observatoire National de la Migration to contribute to discussions on legislative proposals concerning migration and human trafficking. The workshops provided technical input and gathered feedback to inform a policy brief containing actionable recommendations.

Shams focused on providing tailored legal assistance to marginalized groups, including LGBTQ+ Sub-Saharan migrants, who faced severe risks under the existing legal and social climate. Despite this, the organization established case management systems and provided legal and medical services to LGBTQ+ individuals and Sub-Saharan migrants and addressed acute gaps by setting up anonymous hotlines and coordinating safety measures for vulnerable populations. Further, in response to heightened risks, HMH introduced safety protocols for partners and beneficiaries, focusing on digital security and anonymous reporting mechanisms.

7.3 EFFICIENCY

EQ.9 How efficiently were project resources, including financial and human resources, used to achieve the project objectives? Were the activities cost-effective?

Assessing the project's efficiency necessitates comparing HMH's partner-driven approach in Tunisia and Egypt with the direct-implementation model in Libya, as each method presents trade-offs in coverage, long-term sustainability, and operational risk. The evaluation indicates that neither approach is universally superior; rather, the most suitable strategy is shaped by context-specific conditions, such as security constraints, legal registration requirements, donor priorities, and the availability of capable local actors. Nonetheless, findings suggest that integrating local partnerships can extend reach, reduce dependence on external teams, and support more sustainable outcomes over time.

Two models: Direct implementation – Partnerships centred approach

In Egypt and Tunisia, the partner-based model offers quicker adaptation to local contexts, wider reach, and stronger prospects for local ownership. Moreover, it offers a scalable and replicable model that can increase support to local partners according to funding, context and needs. Partners indicated that the project was largely cost-effective, with funds well distributed to achieve planned objectives and outputs within the available timeframe. This marks the first instance in which many partners received resources explicitly for organizational capacity-sharing, contributing to a sense of added value. However, the short duration of the project was a key challenge, further compounded by delays in receiving the budget. On the other hand, Libya's direct-implementation model delivers consistent service quality under robust oversight but struggles with timeliness, comprehensive coverage, and sustainability. The choice to not engage with local partners is primarily tied to considerations around scalability and visibility. Collaborating with these organizations would increase the visibility of NRC Libya, which the organization aims to avoid for risk mitigation purposes. While there are potential local partners, NRC's strategic decision to limit such cooperation is rooted in concerns over security and operational risks, given the volatile environment and the potential repercussions of being more publicly associated with local entities. In the Libya case, efficiency was constrained by a combination of internal and external factors. NRC's direct implementation model, while ensuring a certain level of quality control, relies on a highly staff-intensive structure, with no local partnerships and frequent volunteer turnover due to local liquidity issues. Prolonged procurement and recruitment processes have delayed the hiring of consultant lawyers, making difficult ensuring timely service delivery.

Timeliness	
Libya	**Tunisia and Egypt**
Internal procedures significantly delayed the hiring of consultant lawyers, reportedly taking years to resolve. The prolonged gaps affected the timely delivery of legal and counselling services. Frequent turnover among community volunteers, compounded by difficulty paying them due to Libya's liquidity constraints, led to repeated training cycles, slowing down service delivery and raised concerns about the overall responsiveness.	Partners in both countries noted internal NRC processes, such as slow agreement signoffs, caused initial administrative delays and hindered overall efficiency. For example, financial transfers to partners were delayed in Egypt, affecting the timeliness of support. Despite these issues, once funds and approvals were in place, local partners could deploy activities swiftly.
Funding & Financial Flexibility	
Staff acknowledged the flexibility of the ECHO Grant mentioning that ECHO funding could be adjusted to recruit additional protection officers or modify budget lines. Despite high demand and need (e.g., the surge in Sudanese refugees), NRC deliberately limits program expansion and scale up due to security concerns and broader organizational risk thresholds in Libya.	Partners describe budgets as "medium" relative to explosive increases in refugee arrivals (especially Sudanese and Gazan populations) but appreciated ECHO's budgetary flexibility according to arising needs. Partners rely partly on the ECHO grant but also seek additional donors. The HMH approach supports business development for partners (e.g., assisting in proposal writing). In Tunisia the HMH demonstrated commendable efficiency in reallocating resources to address

| The pilot on financial legal assistance proved successful and was integrated into subsequent projects. | immediate needs arising from the crackdown. Despite the suspension of partner activities, the HMH maintained funding, enabling partners to remain operational and reassess strategies without financial collapse and minimizing disruptions. |

Human resources and capacity building

| The project heavily depends on NRC's own lawyers, legal consultants (once recruited), and community volunteers. Turnover among volunteers and delayed consultant hiring weigh down the continuity of legal services. Consultant lawyers are hired only after complex procurement processes which were severely delayed. While this ensures consistent quality control, the absence of formal partnerships with Libyan NGOs leaves NRC alone in managing all operational and administrative hurdles.

In Libya a significant portion of resources was dedicated to human resources (lawyers, case managers, etc.) rather than the provision of goods. Partners highlighted the strategic use of external legal consultants to reduce overhead while maintaining quality services. | Local partners demonstrated that local legal teams could scale up swiftly, or reconfigure their operating style according to needs.

Capacity-building, including training on case management and protection, boosted local ownership and fosters sustainability. STARS' mentorship of URN and EFRR's efforts to expand beyond Cairo are key examples.

While partners appreciate NRC's technical support, they also cited slow contracting and stringent compliance protocols as obstacles. Nonetheless, once contractual hurdles are overcome, local CSOs often bring specialized knowledge and strong community ties. |

Cost Effectiveness

The figure below visually compares how much each approached allocates to "staffing" versus "direct activities" under two different implementation models. The bar chart compares how the Libya program (orange bars) and the Egypt/Tunisia (yellow bars) program allocate their respective budgets between staffing costs and activities. While the chart indicates that Egypt/Tunisia invests a larger percentage of its budget directly in partner-led services and potentially benefits from broader local coverage, Libya gives more funds to staffing, consistent with a centralized operational model. However, these figures alone do not determine which approach is best. Other factors, such as security constraints, legal frameworks, the availability of strong local partners, and the overall humanitarian context, also play a critical role in deciding the most effective strategy for service delivery. Further, it is relevant to point out that the HMH as well is providing services but not directly through their staff, but through partners. In Libya, the project focused on legal aid, case management, and other non-material "soft" interventions. Consequently, a significant portion of resources was dedicated to human resources (e.g., lawyers, case managers) rather than the provision of goods. Interviewees

Figure 6 cost effectiveness ratio: activities vs staffing costs

highlighted the strategic use of external legal consultants to reduce overhead while maintaining quality services. The budget devotes a high share to staff salaries and operational overhead, with approximately 66,000 Euros dedicated to programme salaries and additional outlays for support staff, the Libya operation relies heavily on NRC's internal capacity.

On the other hand, HMH's approach of directing approximately 74% of its budget to partner activities (with only 22% allocated to staff and support) is notable for minimizing overhead and focusing resources on local implementation. This slim structure not only helped HMH remain responsive to emerging crises (e.g., the rapid mobilization of legal aid for Sudanese arrivals) but also positioned it to swiftly engage in new emergency responses without incurring high administrative costs. The HMH budget dedicates significant resources to partner-led outreach and capacity-building, indicating localization strategy efforts, which in time, could further amplify reach and sustainability, as local entities continue providing services post-project. In fact, partners in Egypt and Tunisia also receive substantial direct support lines in terms of partner

outreach, legal info session and legal counselling. Community-based approaches as training leaders and expanding localized services proved cost-effective by reducing dependency on external actors, even though interviewees mentioned that the limited funding prevented comprehensive capacity-building provision.

Coverage and reach	
Direct implementation model (Libya) Services are primarily concentrated in Tripoli and Western Libya due to security constraints that limit mobility. As a result, staff must carefully balance the need to mitigate risks with the imperative to provide assistance to vulnerable non-Libyan populations. The allocation of most resources to in-house staff, can ensure consistent operational standards in volatile settings, but can limit geographic expansion if staff cannot easily access certain regions. Security restrictions limit geographic coverage, resulting in fewer beneficiaries served relative to the total staff cost. While Libya's approach might maintain service quality through NRC's own legal experts, it risks lower national coverage given the complexities of movement and ongoing security risks.	**Partner-centric model (HMH/Tunisia and Egypt)** Partner networks (CBOs, MRLOs) expand coverage geographically (e.g., Aswan, North Coast) across urban and remote areas in both Egypt and Tunisia, facilitating localized service delivery and reduces the travel burden on international staff. The HMH budget emphasizes partner outreach and legal counselling, supporting numerous local CSOs, CBOs, and migrant/refugee-led groups. Substantial funding lines for partner-led initiatives enable broader geographic coverage across urban centres and, where feasible, more remote locations.
Risk Management and Compliance	
Direct control over staff and operations may simplify some aspects of compliance but places the full security and programmatic burden on NRC.	Partner-based approaches can distribute risk but demand stringent oversight of multiple subgrants and consistent compliance checks. Managing these relationships requires significant technical and administrative support.
Quality Assurance and Accountability	
Centralized operations can maintain strict service standards through a single, coherent program team, yet this setup can limit community-level ownership and responsiveness if local engagement is weaker.	With many local actors involved, accountability mechanisms and standardized quality controls become crucial. Investment in training, monitoring, and regular reviews ensures partners align with NRC's principles.
Scalability and Adaptability	
Scaling up quickly may be more difficult without pre-identified partners, especially in a challenging security and regulatory environment. On the other hand, a direct approach can adapt quickly if internal structures are strong, but expansion is limited by in-house staffing and security thresholds.	Scaling can be more feasible because partner networks can absorb additional funding, expand outreach in underserved areas, and flexibly respond to new crises. However, reliance on multiple partners can complicate coordination if roles and responsibilities are not clearly defined.

Key takeaways

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Direct Implementation

- The Libya **direct model** provides immediate, centralized consistent legal services with standardized procedures but is hindered by bureaucratic delays, limited coverage, and minimal local ownership, raising concerns about long-term viability and overall cost-effectiveness. Expanding to meet fluctuating needs (displacement crises) could prove to be challenging and "heavier".

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Partner led approaches

- **Partner-led approaches** in Egypt and Tunisia exhibit higher adaptive capacity, broader coverage, and potential for sustaining services post-grant, though at the cost of navigating complex NRC and donor compliance processes, requiring robust partner screening and capacity support. These are of course strongly aligned with broader humanitarian calls for localization, investing in local leadership, capacity, and sustainability.

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- These insights confirm that, while context constraints differ substantially across Libya, Tunisia, and Egypt, a strong partner network can facilitate more rapid responses, geographical reach, and potential sustainability. For NRC, investing in local capacity (even in challenging environments like Libya) could bolster coverage, and eventually create a viable exit strategy.
- Partner-led approaches led to efficient responses once contracts and procedural requirements are satisfied, thanks to embedded local networks; Libya experiences repeated bottlenecks (consultant recruitment, volunteer turnover). Such set-ups strengthen local capacity and reduce reliance on external staff, whereas Libya's direct approach centralizes staffing but struggles with volunteer retention and consultant procurement.
- Direct implementation approaches risk missing opportunities to align with the localization agenda, particularly if local organizations exist but are not leveraged.

7.4 SUSTAINABILITY

EQ 10. What is the likelihood that the benefits of the project will continue beyond the end of the funding period, especially regarding the capacity of local partners and protection networks?

Overall, the HMH's model demonstrated potential for sustainability by fostering partnerships with local organizations and promoting capacity-sharing. The approach aligns well with global localization agendas, bolstering civil society structures that are more likely to endure beyond the life of a single donor-funded project. Several elements show promising insights towards sustainability:

> The 2023 and 2024 Strategy Review and Workshops encouraged collaborative planning and co-development of the Hub's long-term strategy where different models for the network structure and governance were developed by the partners, and funding strategies were discussed.

> Further, by the end of last year, HMH finalized comprehensive annual plans and strategies for 2025 in collaboration with its partners, with finalisation currently underway.

> While acknowledging the ongoing challenge of securing long-term funding, the HMH has made substantial strides in diversifying and growing its funding sources: over time, the project successfully expanded its support to partners, particularly in Egypt. As the HMH consolidated, the team enhanced its fundraising efforts, dramatically increasing financial resources across different partners.

For the HMH project's benefits to continue, securing long-term funding, increasing network governance, local leadership, and targeted advocacy to address systemic issues are essential. While the project has achieved impressive results, the clash between short-term humanitarian funding and the need for sustainable solutions remains a major challenge. To maintain its impact, it is crucial to enhance local involvement, build strategic partnerships, and advocate for broader reforms. **Most stakeholders agreed that project outcomes, particularly newly acquired legal knowledge and community-led initiatives are likely to endure beyond the current funding cycle.** Partners in both Egypt and Tunisia stressed that legal awareness campaigns, digital materials, and trained networks of community leaders will remain operational. This is supported by evidence of:

1. **Continued access to awareness-raising and capacity-sharing content:** communities are still able to access online platforms and resource materials after the project's official end. For example, the digital safety guide distributed by the HMH is a resource that partners can continue to use to safeguard themselves against surveillance and operational risks. Materials, digital campaigns, and local partner networks like URN in Egypt and Shams in Tunisia are expected to continue. In Tunisia, partners have managed to navigate restrictive laws by operating quietly.

2. **Provision of legal services**: CSOs and community-based organizations (CBOs) intend to continue providing legal advice and direct support, possibly at a reduced scale if other fundings is not secured. The creation of legal units with national bar associations (Tunisia) and strengthening MRLO structures (Egypt) will foster the sustainability and impact of project outcomes into local frameworks.

3. **Local partners demonstrated commitment** for sustaining certain activities independently after the project's end and continuing advocacy efforts. For example, the Arab Institute for Human Rights in Tunisia shifted towards legislative reform advocacy during the crackdown, showcasing adaptability and potential for long-term impact.

While the HMH has secured an internal extension until the end of 2026, partners reiterated that migration and displacement issues would require long-term engagement to ensure stable structures. To ensure further sustainability, partners sought diversified donor support and have established networks or internal structures such as community-led initiatives or volunteer systems to the absence of stable funding risks the discontinuation of key services.

> Unanimously, short-term humanitarian grants were identified as a major obstacle to deeper, more robust sustainability plans, including long-term planning and organizational sustainability and the pilot nature of the Hub further complicated access to multi-year funding. Both survey and interview respondents highlighted the difficulty of organizing resources and staff amidst time-bound

The sustainability of operations in Libya remains heavily constrained by the lack of a well-established, locally rooted organization that can operate independently and provide support to non-Libyan populations without fear of closure, persecution, or legal repercussions. To address this gap, the project focused on raising the knowledge and capacity of community volunteers, aiming to create a grassroots mechanism for sustainability. However, while this strategy represents a meaningful step, it is inherently limited by the broader systemic and challenges: although training for community volunteers contributes to local knowledge, high turnover and security concerns limit the potential for these groups to provide support to non-Libyans in the long term.

EQ.11 To what extent have the local partners and community-based organizations gained the skills and resources needed to continue delivering legal protection and capacity-sharing activities independently?

The data analysed indicates that the project has made substantial strides in building the capacity of local partners to continue delivering legal protection and capacity-building activities. However, challenges remain in ensuring full sustainability, especially in areas like specialized expertise and structured knowledge-sharing systems.

- During the project's lifespan significant efforts were directed at strengthening local partners, including legal training for community leaders, cascading knowledge, and reinforcing protection networks like MRLOs.
- Partners emphasized the need of continued training and capacity sharing to ensure project's benefit will go beyond its end, as confirmed by the results of the survey carried out during the partners learning workshop in December 2024.

Assessment of partners' skills within the hub

- Understanding and appreciation: While last year's result was 100%, this year 92% of respondents (67% strongly agreeing, 25% agreeing) reported understanding and valuing partners' non-financial resources. One respondent (8%) remained neutral.

- Capacity sharing: All partners indicated that they engaged in capacity-sharing activities with NRC.

- Broader learning benefits: Half of the partners (particularly migrant- and refugee-led organizations) highlighted additional learning advantages, such as:

  o Donor Expectations (e.g., budget planning, compliance)

  o Communication & Reporting (e.g., clearer and more strategic messaging)

  o Case Management (e.g., organizing and tracking client needs effectively)

  o Future Project Implementation (e.g., applying new methods to upcoming programs)

Positive Outcomes

- In Tunisia, partners like Shams, conducted legal training for LGBTQ+ community leaders, enabling them to negotiate directly with UNHCR and other authorities for case resolutions. Capacity-sharing workshops focused on cross-border legal aid and community-driven initiatives to address protection gaps and to align with the identified needs and were consistently cited as successes.

- The training and empowerment of community leaders were highlighted as central to ensuring that the project's outcomes would persist beyond the funding period. Community leaders, once trained, have begun training others within their networks, ensuring broader dissemination of legal and protection knowledge. The ToT model proved to be effective, especially for legal awareness and youth empowerment. Another positively mentioned element was that the training and capacity-sharing activities were not only directed at local organizations but also at the refugees themselves, helping them build skills that enable them to take more active roles in self-protection and community leadership.

- The training on protection risk management, child protection, and women's protection was emphasized as crucial to building the capacity of partners to address the specific needs of people on the move, equipping them with teaching methodologies to transfer skills within their networks, amplifying the project's reach and sustainability.

- Through enhanced donor outreach and liaison and business development skills, partner organizations have become more confident and autonomous in applying for call for proposals and seeking new funding sources.

- Partners described examples where cases in Egypt required coordination with Sudan or other countries, underscoring the need for continued cross-border learning. Though this aspect remains

underexploited, initial efforts have validated the potential for more comprehensive regional collaboration.

Gaps

- Some partners highlighted shortfalls in terms of acquiring skills and competences in specialized areas, such as handling detention cases, GBV, or LGBTQI+ psychosocial support, meaning they still rely on external expertise.
- Cross-border legal aid interventions: in the Egypt-Sudan context there were references cases where refugees and migrants in Egypt required legal support that could only be resolved in Sudan. This was identified as an area of learning and capitalisation that was not fully materialised: partners acknowledged the need for better structuring and expansion of cross-border legal interventions within the HMH and NRC.
- Interviewees noted a shortage of standardized tools or repositories to document lessons learned. While "ad hoc" capacity-sharing has occurred, a more structured knowledge management system could help institutionalize these gains.

EQ 12. What mechanisms are in place to ensure the long-term sustainability of the financial legal assistance pilot and community-based protection mechanisms introduced by the project?

Financial legal assistance pilot

In **Libya**, the pilot demonstrated clear added value, particularly for people needing assistance with passport renewals and other legal documentation. As a result, elements of the pilot will be replicated or scaled up into upcoming projects, ensuring that the approach continues beyond the single funding period. This is an element of undeniable sustainability, even though other challenges persist as highlighted in previous sections.

However, counselling and information sessions (in Libya) showed limited long-term viability, as monitoring data revealed that 97% of participants were unable to act on the legal or administrative information provided, primarily due to financial barriers and lack of proper documentation. Although some beneficiaries reported finding these sessions clear and useful, the inability to move forward significantly undermines sustainability. Moreover, the sessions are heavily reliant on NRC's staff and funding, with no established local entity ready to continue them independently, further limiting their potential to remain effective after the project concludes.

Community-based protection mechanisms

Across **Egypt** and **Tunisia**, partner organizations have integrated project's elements such as information sessions, awareness campaigns, legal counselling, and referral networks into their in their annual work plans and proposals to other donors, making it more likely they will persist once the project ends. By training local staff, community leaders, and volunteers to carry out legal counselling, disseminate information and coordinate referrals. By building technical and managerial skills within local actors, the project has promoted self-reliance in service provision, including financial legal aid where relevant.   For community-based initiatives, the ToT model facilitated knowledge sharing and dissemination long after the Hub withdraws and allow them to conduct cascading training sessions for others. For example, Shams improved the negotiation skills of community leaders, enabling them to advocate effectively for their members with authorities and UNHCR. This was cited specifically in Tunisia with LGBTQI+ community leaders and in Egypt with newly formed MRLO networks. Further, finding showed that he creation of referral systems, for example, connecting community-based organizations in Cairo's neighbourhoods or bridging different NGO services in Tunisia, encouraged multiple actors to collaborate on complex cases (e.g., detention or GBV).

7.5 IMPACT

EQ.13 What evidence is there that the project has contributed to increased protection and exercise of rights among beneficiaries, particularly through access to legal protection and capacity-building initiatives?

It is important to note that evaluating the impact of a project is a process that requires waiting 5 to 10 years after the project's completion, as it aims at assessing the extent to which the project has generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects. Nevertheless, at this stage, it is indeed possible to discuss the positive effects induced by the project in the short term.

It is important to note that the data analysed in the ECHO indicators tracking tool does not include all partners, implying that the findings are not 100% representative of the entire intervention's impact. The data presented here is based on the partners included in the tracking tool, and thus, may not capture the full extent of the intervention's effects across all regions and partners as this includes the EFRR and StARS for Egypt, and TDA in Tunisia. Based on the data collected thus far, the intervention has achieved notable outcomes; however, there remains a need for more robust documentation to better illustrate how these activities contribute to broader, long-term changes as there is insufficient evidence in the current documentation to demonstrate the concrete link between these activities and the expected systemic or higher-level impacts. Looking at the data available, there is evidence of significant outreach and positive impacts, though specific changes in beneficiaries' lives are not fully documented as that would imply the presence of indicators to measure long-term changes in protection capacities or self-reliance of individuals and communities. The following indicators suggest improvements in service delivery and beneficiary outcomes:

- o **Beneficiaries reporting safe and accessible humanitarian assistance**: 94% of the overall target has been achieved, with Egypt achieving 88%, and Libya achieving 99.7%. This indicates a high level of satisfaction and a positive impact on the beneficiaries' experience of assistance, which can imply improve living conditions and access to aid in a safe, accountable, and participatory manner.
- o **Self-protection opportunities for beneficiaries**: 126% of the target was achieved across all regions. This suggests that a significant number of beneficiaries reported that support for self-protection was not only useful but might have led to improvements in their decision-making and level of protection. Although we don't have exact data on how this translated into their lives, these figures suggest a tangible benefit for the beneficiaries.
- o **Increased knowledge of rights**: The overall target of 2,648 beneficiaries was almost fully achieved, with 91% of the target met. This indicates that a large portion of beneficiaries gained appropriate knowledge on relevant rights.

While the intervention's direct effect on norms or systems may not be immediately apparent, the following indicators suggest that systems and networks have been enhanced:

- o **Local protection networks reporting increased capacity**: This was achieved at 131%, with 93% in Tunisia. It shows that local responders and protection networks have gained increased capacity, which could be an indicator of systemic improvement in the local structures supporting migrants and refugees. This could lead to better protection mechanisms and referrals, suggesting a change in how protection services are delivered at the local level.

- o **Number of partnerships and community networks**: The target of 4 partnerships was surpassed, with 7 established. This indicates that the project has helped build stronger community networks and partnerships, which could facilitate long-term improvements in legal protection and assistance systems. The project was commended for its added value, particularly in connecting various initiatives through workshops and bringing together local partners and creating a momentum for local partners, who were able to leverage on the joint efforts.

- o **Support for community-led initiatives**: With 100% of the target reached, the project supported initiatives that enhanced self-protection opportunities. This could be indicative of shifts in community-level norms, where community members take on more active roles in self-protection and collective advocacy.

Across Tunisia and Egypt, interviewees stressed the importance of building local partner capacity. For instance, Refugee Platform Egypt (RPE) grew from a volunteer-driven group into a structured organization with sustainable growth. However, progress on self-reliance varied: in Tunisia, operational barriers limited direct empowerment, whereas in Egypt, support for community-led organizations laid a foundation for long-term self-reliance. The project's strong impact was most visible in addressing urgent protection needs and

strengthening local actors' capacity to deliver context-sensitive services. Beneficiaries reported feeling safer and more empowered, with community-led responses fostering immediate relief and collective resilience.

Tunisia

Due to the situation faced by the country and consequent limitations and risks, the scale of the impact remained limited. The compressed timeframe of the partnership and the need to change partners halfway in the project's implementation, further restricted the possibility of a sustained impact, especially in addressing the root causes of displacement or long-term systemic issues facing vulnerable populations. Additionally, while some community leaders gained skills in negotiation and secured services for vulnerable groups through UNHCR, this impact was mainly localized and short-term. For instance, efforts to assist LGBTQ+ individuals with children or to provide health referrals to HIV-positive individuals were valuable, but these interventions were isolated. The ability to expand outreach and create an anonymous helpline was a step in the right direction, but these efforts remain small-scale and do not address broader societal barriers. Ultimately, the project demonstrated limited success in building trust within the community, yet the reach and depth of these efforts were constrained by external factors and the lack of longer-term sustainability.

Egypt

In Egypt, the provision of legal assistance emerged as a cornerstone of the project's impact. Partners underscored that newcomers needed clear guidance on registration processes and legal rights, especially in an environment where "*conditions have worsened for migrants*", the project offered critical services such as emergency response clinics, which informed individuals about their rights and facilitated family reunification assessments for unaccompanied children. Training sessions on legal awareness, mental health, and youth empowerment were reported to be particularly impactful, with URN stating that "*awareness of mental health was promoted*" and "*emergency response initiatives were enhanced through previous training*". Many organizations within URN reported improved internal capacities, which enabled them to respond more effectively to new arrivals' varied needs.

EQ 14. What unintended positive or negative outcomes (if any) emerged as a result of the project's activities, and how were they managed?

Concerning unintended effects (positive or negative) the following elements were identified within the analysis process:

Positive Outcomes

- o While the Sudanese crisis this surge led to a significant increase in the number of beneficiaries accessing services and placed additional pressure on project structures, it demonstrated the project's capacity to adapt and meet increased demand. The initiative proved invaluable for beneficiaries who otherwise might not have received support. The project team scaled up workshops and counselling sessions to accommodate the influx while prioritizing the most urgent cases.
- o The project's rapid expansion and visible impact initially prompted some MRLO partners to anticipate ongoing or increased funding. However, under this ECHO grant, such concerns did not arise, and partners were able to maintain and even scale up their activities without encountering the funding gaps they had feared.
- o The project's insights into migration patterns and local crises proved valuable for advocacy purposes, contributing to regional and international conversations on migration, especially in Tunisia. Local partners conducted analyses that enhanced their ability to engage in advocacy and policy discussions.

Negative Outcomes

- o In Tunisia, the April 2024 crackdown essentially undermined a year of work, and the project has yet to fully regain its previous scale. During the crisis, the HMH rightly prioritized partner and staff safety, limiting direct engagement with beneficiaries. While creating a legal aid network and distributing safety protocols provided vital support to partners, the overall impact on beneficiaries was constrained.
- o The Sudanese crisis increased the workload significantly, straining project resources and staff capacity. Although the project managed to support additional beneficiaries, the unexpected demand risked reducing service quality and overextending staff.
- o Although the project did not directly cause intercommunity tensions or incidents of violence, it is important to note that pre-existing community dynamics in Tunisia or Egypt were indirectly influenced by the intervention leading to tensions around fair access to aid. For example, in Tunisia, the dominance of the Cameroonian community within certain areas led to tensions over the equitable distribution of aid.

EQ. 15 In Libya, what was the impact of the financial legal assistance and community-based information sessions? Did these activities lead to broader changes in legal awareness and protection outcomes for displaced populations?

Financial Legal Assistance

The analysed data from the most recent outcome monitoring indicate that NRC's legal assistance has had a significant impact on enabling beneficiaries to obtain critical documentation. Notably, the chart illustrates the 100% of surveyed individuals who received legal assistance and were able to take appropriate actions, concerning initiating legal or administrative processes to address your concerns and in terms of submitting requests to obtain important documents (such as an ID, passport, title deed, or work contract). Further, again the 100% of respondents confirmed to have received enough follow-up from NRC during the Legal Assistance provision and to have been able to resolve your specific dispute/challenge/problems as a result of the Legal Assistance provided by NRC.
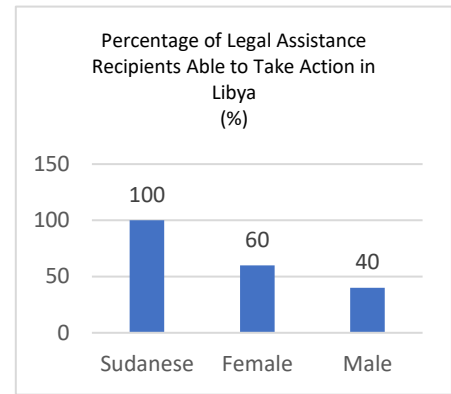

Figure 7 - Legal Assistance overview

General information session - GIS

Concerning the GIS activities, the data suggests these were largely successful in delivering clear information to most beneficiaries (97%), who reported high levels of satisfaction, particularly for female and Sudanese respondents, who reported high levels of satisfaction. However, there appears to be a noticeable gap for male beneficiaries, with only 15% expressing that the information was clear. This may highlight a need to refine the approach or tailor communication methods to better engage male participants. Concerning how beneficiaries learned about the information service provided by NRC. The breakdown by source is as follows:

1. Other Sources: 66% of respondents learned about the service from other sources, which included mainly friends, relatives, neighbours.

2. NRC Staff: The largest group (32%) of beneficiaries reported that they heard about the service through NRC staff. This indicates that NRC's direct communication channels were the most common method through which beneficiaries received information.

3. Community Leaders: Only 2% of respondents mentioned community leaders as the source of information. This suggests that community leaders played a minimal role in disseminating information in this context.
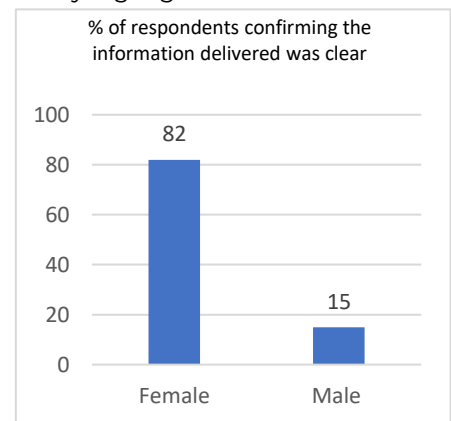

Figure 8 - Legal Assistance overview 2

The data regarding the ability to take action or initiate legal/administrative processes based on NRC's information services reflects several underlying challenges, particularly in the context of counselling and legal assistance. The overwhelming majority of respondents (97%) were unable to take action or initiate legal or administrative processes based on the information they received. In particular:

- Females and Sudanese beneficiaries reported the highest percentages of inability to take action (82% and 81%, respectively), indicating potential challenges in translating the information into concrete legal or administrative actions for these groups.

- Male beneficiaries reported somewhat lower rates of inability to take action (15%) but still reflected limited outcomes from the information received.

The main reasons behind this inability were related to the inability of affording the process (67%), the lack of supporting document (13%), other reasons (15%). The inability to take action is largely due to several factors. Many beneficiaries face challenges in obtaining necessary documentation, such as having a passport but not for their children or not knowing how to register a birth certificate. Financial barriers also play a role, with some unable to afford document renewals. Additionally, lack of knowledge on how to proceed with legal processes further limits beneficiaries' ability to take action. These issues highlight the need for continued information and counselling services to help individuals navigate evolving processes.

One significant issue highlighted is that many respondents, despite receiving legal information, are unable to issue their documents due to the lack of available services in the country. For example, at the Sudanese embassy, there was a lack of a registry department until recently, which made it impossible for beneficiaries to register important documents such as birth certificates or marriage certificates. Previously, the embassy only issued passports, creating a significant gap in access to essential legal documentation. However, last

year, the embassy opened a registry department to register births and other documents. While this is a relatively new development, there is still uncertainty about how the documentation process works, and it may take time for beneficiaries to fully understand and navigate these procedures.

Counselling Services

The data indicates that 100% of respondents found the counselling services clear and useful, which reflects the positive impact of these services. However, it is worth noting that only 31 male respondents stated that the counselling was useful, while the rest of the female respondents reported the same, raising the potential for further investigation into why males might feel less impacted by the counselling sessions. This could provide insights into gender-specific barriers or differences in how information is received or utilized.

Additionally, 69% of respondents felt that the counselling process was confidential, which is important for ensuring trust and comfort during sensitive sessions. A deeper investigation could be warranted to understand the remaining 31% who did not perceive the service as confidential, as this might indicate issues with the confidentiality procedures or the environment in which counselling took place.

Furthermore, 100% of respondents agreed that they received enough knowledge to make an informed decision during the counselling process. This suggests that the information provided during these sessions is comprehensive and empowering for beneficiaries.

Despite 100% of respondents agreeing that they received enough knowledge to make an informed decision during the counselling process, 92% reported that they could not take appropriate actions after the counselling. This is a critical finding, as it indicates a significant gap between being informed and being able to act. The reasons for this can be attributed to various external factors that hinder beneficiaries from taking action included external barriers such as hearing difficulties, financial issues and lack of documentation prevented individuals from taking action.

8. Conclusions & Recommendations

RELEVANCE

Overall, the project demonstrated a high degree of relevance in addressing urgent legal and protection needs of displaced populations through a combination of legal aid, capacity-building, and flexible responses. Its deliberate adaptability allowed it to respond effectively to shifting contexts, particularly during the 2023 Sudanese and Gaza crises. However, structural constraints such as short-term funding cycles, restrictive political and legal environments, and operational barriers significantly limited the scale and long-term sustainability of its impact. As a result, while the project often met immediate and urgent needs, it did not fully match the extent of complex, ongoing protection and legal challenges that PoM may face. Specialized services (GBV, psychosocial support, and assistance for LGBTQI+ communities) remained under-resourced, leaving critical vulnerabilities only partially addressed. The sudden influx of new beneficiaries, primarily due to the Sudanese and Gaza crises, placed additional pressure on existing resources, further constraining the ability to provide comprehensive support across all target groups. Nevertheless, strong coordination mechanisms with international and local civil society organizations helped prevent duplication and maximize impact, particularly where the project's legal aid interventions complemented other agencies' shelter, medical, or social protection services.

Recommendations

2. Strengthen continuous needs and risk assessments by conducting periodic mini-assessments or quarterly check-ins with beneficiaries (focus groups, quick surveys) to identify emerging challenges such as intercommunity tensions, new barriers to legal registration, other obstacles.
3. It is recommended that NRC and the HMH engage with ECHO to advocate for a more comprehensive service provision within the scope of the HIPs, eventually allowing to address the broader protection and support needs of beneficiaries.
4. Develop partnerships with specialized local or international NGOs that can complement legal and capacity-building services and consider including sort of "add-on" service modules provided by international and local actors/organisations or sub-grants specifically assigned with expertise in the targeted service area such as psychosocial support and GBV response needs. Additionally, strengthen linkages between partners engaged in different initiatives to improve coordination and foster more cohesive intersectoral collaboration.
5. Consider equipping lawyers, paralegals, and community leaders with the skills to recognize and respond to GBV or mental health needs, ensuring they can support survivors appropriately and reduce burnout.
6. Reinforce the presence of clear referral pathways for specialized care (e.g., trauma counselling, safe shelters) and maintain a roster of trusted local service providers.
7. Allocate advocacy budget and regularly engage local authorities or embassies to address systemic bottlenecks), ensuring the project remains aligned with evolving legal and policy environments.

EFFICIENCY

The project's efficiency ultimately depends on finding the right balance between strict, centralized oversight and meaningful local involvement. Partner-based approaches in Tunisia and Egypt have shown to be more flexible and cost-effective, delivering services across wider areas and to diverse groups with fewer international staff. By contrast, direct implementation in Libya provides consistent quality in a volatile environment but can become expensive and difficult to scale.

Recommendations

HMH – Partner centric model

1. Keep focusing and investing on ongoing *capacity-sharing processes* by providing structured onboarding materials (e.g., compliance guides, monitoring templates) to help local organizations quickly meet NRC and donor requirements. Ensure maintaining regular training sessions on financial management, data protection, and safeguarding to reduce administrative bottlenecks and ensure consistent service quality.
2. Strengthen staff and partner capacities to respond to hate speech, online harassment, and potential safety risks, ensuring a safer operating environment for both implementers and beneficiaries.
3. Consider as well short, targeted training to equip local partners with basic survivor-centred skills.
4. In line with HMH strategy, work with local partners to create multi-year roadmaps for service continuity (e.g., post-project funding plans), so that the capacity built under the project is not lost at grant closure.
5. Encourage advocacy alliances among partners, laying the groundwork for more systemic reforms (e.g., improved local migration policies) that reduce reliance on external interventions.

Libya - Direct Implementation

1. Train in-house legal/protection staff to offer "light" psychosocial first aid.

EFFECTIVENESS

Project's **overall effectiveness is considered strong, as flexibility enabled outcome achievement.** Despite operating in volatile contexts, **60%** of project indicators already exceed targets, particularly in legal support and partnerships. Tailored approaches such as the financial legal aid in Libya, or the paralegal training in Tunisia and Egypt proved to be effective in meeting immediate protection needs. Adaptability allowed the project to reach marginalized groups despite major disruptions as project teams and partners adapted swiftly by forging new partnerships, expanding geography, or refocusing on priority groups (Sudanese refugees in Libya). Yet the depth of impact (e.g., comprehensive psychosocial care, advanced legal support for all nationalities) sometimes lacked due to a variety of constraints - mainly in Tunisia. The HMH model's agility is evident in scenario-based planning and strong communication with local actors. Accountability processes and role clarity have improved markedly. Still, long onboarding cycles, stringent compliance, and limited contingency resources hamper rapid responsiveness most acutely in Tunisia (crackdown) and Libya (security).

Recommendations

1. Keep fostering peer-to-peer capacity-building and specialized services through tailored funding and technical support to local organizations that can host or co-lead these specialized training sessions.
2. Formalize early-warning protocols, pre-approve flexible budget lines, and develop simple partner rapid response plans to minimize future delays when crises escalate.
3. Procedures:
   a. Refine NRC's internal procedures to avoid unnecessary delays, if possible, by streamlining some procurement/recruitment steps (e.g., standardized ToRs, simplified contract templates) and consider lighter compliance requirements for smaller or grassroots organizations without extensive admin capacity.
   b. It is recommended that NRC and the HMH engage with ECHO It is recommended that NRC and the HMH engage with ECHO to lighten / simplify IP requirements and especially for local partners.

SUSTAINABILITY

The capacity-building, ToTs, knowledge-sharing, and community-led initiatives show strong potential to persist beyond the project period, driven by local buy-in and integration into partners' main operations, while short-term humanitarian funding and restrictive operating environments (especially in Tunisia and Libya) constrained the depth and scale of sustainability. Nevertheless, elements of the financial legal assistance pilot will be replicated in future programming in Libya. Sustaining specialized services will require ongoing external mentorship and funding until local actors acquire deeper technical proficiencies and stable financial backing.

Recommendations

1. Develop a multi-year sustainability plan in each country, accompanied by a dedicated monitoring matrix to specifically measure partners' progress in assuming core project activities such as legal counselling, outreach, advocacy, resource mobilization, and service quality benchmarks. By periodically updating the matrix, HMH and partners can jointly assess how close local organizations are to achieving full ownership of services and what additional capacity-building or resources are needed to reach sustainability.
2. Encourage partners to leverage business development skills gained to seek alternative donors.
3. The analysis suggests the need for more structured mechanisms and follow-up on cross-border legal aid, by fostering capitalisation, knowledge sharing and exchange of good practices (among partners, HMH, NRC) towards strengthened consolidation and reflection on how to improve current approaches and practices to provide cross-border legal aid.
4. Keep fostering structured knowledge sharing and management by using shared resource repositories like KOBLI where partners can store and update legal and protection tools, training materials, and advocacy resources.
5. Provide advanced mentorship or secondments for local organizations (e.g., in GBV, detention work, LGBTQI+ psychosocial support).
6. Expand peer exchanges among partners in Egypt, Tunisia, and Libya to tackle regional challenges (e.g., case coordination, referral protocols for cross-border family reunification).
7. Advocate with local authorities to legitimize and protect community-led networks, reducing the risk of shutdown or legal repercussions.
8. Maintain network governance structures by sustain regular strategy reviews and joint planning sessions (as done in 2023–24) to keep partners aligned and collectively address policy or funding

gaps and promoting community representatives and local NGOs in decision-making fora, reinforcing ownership and long-term sustainability of project gains.

2. In Libya, develop progressive handover scenarios, where certain tasks (data collection, community sensitization) transfer to local actors, especially in areas with improving security: If context allows, cultivate relationships with promising local volunteer groups to include them into program structures, enabling a gradual shift toward localized support if conditions allow and consider gradually transitioning some tasks, such as basic legal aid or community outreach, to community leaders, paired with ongoing coaching.

IMPACT

The project demonstrates positive short- and medium-term impacts through enhanced legal protection, capacity building among local actors, and flexible crisis response. However, long-term systemic change in terms of policy reforms, intercommunity relations, and broader protection outcomes remains less documented. Strengthening monitoring and evaluation systems, fostering inclusive community engagement, and addressing financial and administrative barriers are essential next steps to sustain and scale these gains. Indeed, capacity-building activities have bolstered local actors' ability to deliver protective services and navigate sudden inflows of migrants and in turn contributing to a more sustainable protection environment. Financial legal assistance in Libya has been highly effective in enabling beneficiaries to overcome immediate legal obstacles, contributing to improved short-term protection outcomes and a stronger sense of agency among displaced populations.

Recommandations

1. Establish a monitoring framework that follows beneficiaries over 6–12 months after receiving legal assistance to capture whether documentation leads to sustained improvements. Acknowledging that measuring positive impact is often very difficult in contexts like this one. As such, it is advised to consider focusing on intermediate or process-related indicators, rather than waiting for final outcomes which can be hindered by long delays, policy restrictions, and negative context trajectories. Concretely, this approach could include:

   o Prioritise shorter, more frequent, and more focused data collections. If feasible, organize small gatherings (in safe locations) for participants who remain in the area. Ask about recent experiences navigating the legal system, protection concerns, or any partial progress. Select a representative sample of participants: instead of attempting to track all concerned individuals, identify a small, representative group willing to be followed over a fixed period. Keep and increase collaborating with community leaders, MRLOs, or volunteers who maintain contact with PoM even as they move. The networks can gather periodic updates on outcomes or partial achievements such as applying for documents, successfully contacting embassies). Consider using multiple communication channels such as phone calls, WhatsApp, in-person check-ins, to account for targeted PoM's changing circumstances.

   o Where final documentation outcomes are unlikely or take too long, measure the steps completed (such as submitted asylum applications, followed up at embassy; etc.) to capture progress even if official approvals are stalled or denied.

   o Incorporate indicators that examine beneficiaries' capacity to navigate systems independently, such as successfully scheduling their own appointments, or reporting an increased sense of legal awareness or personal agency.

   o Consider using the "Most Significant Change (MSC)" or short outcome-harvesting exercises to record positive shifts (such as preventing deportation, securing safe temporary shelter), even if the final goal (such as a residency permit) is pending.

2. Develop standardized case management tools to track beneficiary progress and document how legal aid interventions affect broader protection outcomes.

3. Continue peer learning events among legal aid providers to share best practices and harmonize service standards.

4. Establish regular coordination forums (including civil society, local authorities, and donors) to scale up successful practices and ensure continuity of funding.

Libya

1. Continue to prioritize financial legal assistance, ensuring budget allocations match demonstrated demand. Enhance engagement with relevant diplomatic missions to streamline document processing and issuing, ensuring that newly opened registry departments are effectively utilized.

2. Counselling/legal advice provision: analyse why male respondents reported lower clarity (15%) and adapt messaging or delivery methods accordingly (e.g., male-specific focus groups, targeted communication channels).

3. Integrate legal aid with livelihoods or psychosocial services, creating a holistic support system that addresses both documentation and socio-economic needs.

9. Annex I – Key Informants List

Name	Role
Katleen Maes	Director, Human Mobility Hub North Africa
Claire Merat	Information, Counselling and Legal Aid Specialist for Libya Office
Mohamed Nashek	Project Manager Libya
Ahmad Massaoud	MEL Officer Libya Country Office
Itsaso Velasco	MEL Manager Libya Country Office
Maya Dalloul	Head of Legal Aid Unit, Human Mobility Hub
Chiara Frabizio	Manages the relationship with ECHO for NRC in Brussels
Samer Kassab Deena Majeed	HMH MEL Coordinators
Marc Ghazali	Consultant for HMH partner survey and learning case studies
Elke Leidel	Previous Head for North Africa for ECHO (currently Sudan)
Wim Fransen	Current Head for North Africa at ECHO
Elena Dikomitis	Previous desk officer for North Africa, Brussels
Jacopo Lombardi	Current desk officer Egypt, Brussels
Local partners' list upon request	

10. Annex II - Secondary data document list

- Project Proposal
- Interim Report (Consolidated Version + Annexes)
- MR Proposal 2024 (Submitted to Donor, 15 Feb 2024)
- Project's budget
- MEAL Documents
  o Outcome Monitoring Survey Libya (2023, 2024)
  o Outcome Monitoring data from HMH partners
  o Indicators' tracking tool
- HMH's Case Studies
- Annex 1_Progress Report as of December
- Simplified BSC HMH-HMH Workplan.xlsx
- Strategy Review and Workshops Reports/Materials
- Internal Organisational Review Documents
- Partners' workshop 2024 reports and survey
- Partners' workshop 2023 reports and survey
- Tunisia-related material:
  o TAT's project's reports
  o Email exchanges
  o Contingency scenario planning document and other assessment reports.