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Evaluation of NRC ICLA Lebanon Programme

Independent Evaluation: NRC ICLA Lebanon Programme March 2020

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This independent evaluation report assesses the Norwegian Refugee Council's (NRC) Information, Counselling and Legal Assistance (ICLA) programme in Lebanon since 2017. The scope of this evaluation covered two of the three main thematic areas of legal support NRC is currently providing to Syrian refugees, namely civil documentation and legal residency in three of the four area offices: the North, the Bekaa, and Beirut / Mount Lebanon (BML). The main purpose of the evaluation was to support learning about the relevance, effectiveness, efficiency, sustainability and impact of the NRC ICLA Lebanon programme and to provide guidance for future programme direction and improvement.

Methodology

The evaluation used qualitative methods including a desk review, focus group discussions (FGDs), and key informant interviews (KIIs). A main approach of the evaluation was to gather most significant change (MSC) stories from refugees, and invite refugee committees to short-list from each area office the stories, which they believed best represented the programme. The evaluators facilitated 24 FGDs with 172 refugees, 1 FGD with 6 lawyers, 25 key informant interviews (KIIs) with key stakeholders, and 3 group interviews with NRC staff. Two data validation and MSC story selection workshops were held with 11 refugees and a results validation workshop held with 24 NRC staff.

Findings on the impact, efficiency, effectiveness and relevance of the ICLA programme

Relevance and effectiveness

The evaluation found ICLA's priorities of civil documentation and legal residency remain extremely relevant and needed for its target population, and are the areas of highest need for legal support to Syrian refugees in Lebanon. Legal residency is important in and of itself, but also enables access to civil documentation procedures and other rights. However, the majority of ICLA's support to legal residency is legal counselling, which FGD recipients reported was of less relevance to them due to barriers to their ability to complete the necessary procedures advised by ICLA. Overall satisfaction with ICLA's civil documentation services is good, but there is a perception that ICLA is inconsistent with their approach to supporting completion of birth certificates, with some regional variations.

The main inconsistency reported by FGD participants was to what extent ICLA were helping recipients complete all steps needed for finalisation of the birth certificate. Whether or not recipients had the necessary paperwork needed to complete all steps, refugees reported they did not understand why ICLA helped some clients' progress further than others did. It is clear there is a communication deficit in this regard.

The evaluation found that ICLA is not adequately differentiating service delivery for the needs of different groups, for example, the elderly, people living with a mental or physical disability or other special needs, but a new partnership with Humanity and Inclusion (HI) may help to address some of the gaps in more targeted and inclusive outreach and service delivery.



Syrian refugees in Beirut/Mount Lebanon holding a booklet about NRC's ICLA services. Photo: Joshua Berson, 2018

Overall, ICLA is highly regarded by local authorities and other international humanitarian legal actors. The evaluation reviewed the ICLA theories of change (ToC); concluding ICLA is achieving objectives where civil documentation facilitates immediate access to education and healthcare in Lebanon, although requirements from local authorities for the level of completion of documents needed vary. Long term outcomes supported include civil documentation enabling travel outside of Lebanon and protections against child trafficking.

The successes of the programme are driven by the capacities of ICLA's volunteer Information Focal Points (IFPs), staff and lawyers. **The IFPs have developed a strong knowledge of the programme and provide a vital link to the Syrian refugee community** to support identification of potential recipients, and raise awareness of ICLA's programming.

NRC also has strong staffing capacity, with staff and lawyers having considerable knowledge of the legal challenges faced by refugees and, in many cases, having worked with NRC for a considerable period. However, limited options in policy and practice for Syrian refugees' legal residency in Lebanon are inhibiting achievement of ICLA objectives around freedom of movement, security, and due process, while ICLA recipient financial and freedom of movement challenges are proving more of an obstacle than lack of knowledge.

As a modality, **more legal assistance and advocacy may be needed to address Lebanese policy and practice challenges to mitigate some of the financial and freedom of movement restrictions.** The evaluation found data management and monitoring of outcomes could be improved; reviewing the criteria for measuring 'success' for birth and marriage certificate cases, to reflect the perspective of the refugees on whether their case has a successful outcome, rather than NRC's measure of success of just moving the process forward one step would be more accurate. Improving standardization of data entry for the type of service received would also improve outcome monitoring.



NRC ICLA provides free of charge information, counselling and legal assistance on civil documentation at legal clinics.
Photo: Joshua Berson, 2018

Efficiency

The evaluation found that the ICLA programme is performing efficiently but concerns exist over whether the stretched capacity of the team is leading to inefficiencies, particularly in communication and timeliness of services, which is potentially eroding NRC's reputation amongst recipients. Approximately 20% of FGD participants said they had not been called back as expected.

NRC should consider if there are ways to redistribute the responsibilities of the IFPs, ICLA staff and NRC lawyers to ensure better streamlining and efficiency of services. NRC is currently not focusing on cross-border synergies with NRC Syria, which could support some current gaps in information.

Impact

The evaluation identified **the biggest change felt by ICLA recipients is a sense of emotional well-being and security both for their immediate future in Lebanon and their long-term future**, by having their documents in order. ICLA recipients who successfully acquire civil documentation or legal residency through programme assistance see an immediate positive impact in their access to other rights, services, and protection in Lebanon, while there is also a long-term impact for rights and protection in the future. ICLA's biggest immediate individual impact is likely for recipients able to acquire legal residency, but as numbers achieving this are low, the impact on the community at large is limited.



An NRC ICLA staff member is conducting an information session about legal services to Syrian refugee women. Photo: Joshua Berson, 2018

NRC advocacy has had limited impact on changing overarching policy and law but has contributed to small wins to mitigate the worst effects of the prevailing environment. Better use of ICLA data and analysis would strengthen evidence-based advocacy for the humanitarian community and across core competencies within NRC. However, ICLA has increased legal expertise and knowledge within the Lebanese administration systems, laying the foundation for the transfer of skills to national legal providers potentially creating a domestic constituency ably positioned to advocate for refugee rights.

Benefits to the recipients of ICLA services should continue in the future for those who have been successful in obtaining partial or fully completed civil documentation or who have obtained legal residency. Systemic sustainability to ensure the continued access to legal rights by refugees beyond ICLA's interventions is more debatable. The evaluation did identify an improvement in awareness among refugees of the need to obtain documentation, and the training of IFPs has built a group within refugee communities who have considerable knowledge of how to obtain civil documentation and legal residency.

The knowledge of the NRC lawyers about the challenges refugees face in obtaining documentation and the means to support them in this process should also be retained in the future. However, this type of sustainability faces severe challenges because of the financial and accessibility barriers the refugee community face in finalising their documents. This is only likely to be resolved if the domestic legal framework evolves to allow Syrian refugees to more easily obtain legal residency, and thus both work and greater unfettered freedom of movement.

The programme is addressing protection risks: NRC's IFPs, staff, and lawyers take steps to ensure ICLA recipients are educated on protection risks. However, there is little evidence NRC is targeting or providing tailored programming to increase the access to potentially more marginalised groups.

Recommendations

1. Improve inclusion in the programme by increasing outreach to persons with disabilities:

- Ensure the Washington Group Questions are being used in all field offices and IFPs are fully trained on inclusion;
- Conduct regular follow up to ensure the approaches are being used accurately and appropriately. This outreach should ensure more data on the needs of persons with disabilities, which can be supplemented by FGDs with persons with disabilities to understand if they have different legal aid needs and if they are able to complete the different steps required in the civil documentation or legal stay process;
- Ensure data is analysed and adjustments to programming approaches made accordingly;
- Not limited to persons with disabilities, NRC should conduct needs assessment focused explicitly on marginalised and vulnerable groups. A needs assessment was conducted in December 2018 but this covered refugee needs in general, not marginalised groups.

2. Improve gender sensitivity by ensuring women are able to choose which gender lawyer they wish to meet with if capacity allows.

3. Improve the accessibility of the clinics and/or expand mobile services to increase access to services by less mobile populations. Options include:

- The evaluation team saw one good practice at NRC's education centre in Bheddine where a wheelchair ramp had been installed, but many clinics required the negotiation of steep steps for access;
- NRC has successfully introduced mobile clinics and sharia courts in certain areas but should consider if these could be expanded.

4. Improve the set-up of counselling sessions by providing toys/books for children in clinics.

5. Pilot different approaches to information dissemination:

- Post cartoon posters explaining legal processes in various locations where refugees need to wait for periods, such as health clinics;
- Review previously developed posters for accuracy and relevance now and re-print where relevant;
- Record WhatsApp messages of instructions after counselling in order to reduce the risk of information loss or misunderstanding. This may also help disseminate information to other members of the family or community interested in these processes.

6. Ensure information on the expected length and progress of cases is provided to ICLA recipients on a regular basis. NRC should:

- Ensure as much as possible recipients are given an expected timeline for their cases when they come in for legal assistance sessions;

- Try to establish a call system for recipients of support to ensure they are kept informed of their case, even if this is just a call to say there has been no progress.

7. Introduce NRC's work on legal residency earlier and more frequently in recipient contact with ICLA. It may be that for cases where it is identified by the lawyer that NRC cannot support on legal stay, this part of NRC's work is not, as practiced, mentioned to the recipient. However, to ensure transparency and awareness of services within the broader community, it would be advisable to be clearer with all recipients on what NRC can and cannot support on with legal residency.

8. Improve transparency on criteria for support:

- ICLA should publish and be more transparent with recipients on their criteria for counselling vs legal assistance.
- ICLA should publish and be more transparent with recipients when they are able to assist at each stage, and when they are not.

9. Improve the effectiveness and analysis of outcome monitoring: Outcome monitoring for legal assistance services focuses on immediate outcomes, not long-term outcomes, so the longer-term impacts on the lives of refugees are not identified, and for counselling services focuses on short term outcomes (up to 4 months after the first counselling session for civil documents), with no monitoring of the final step achieved in the civil documentation registration process. In NRC's presentation of outcome monitoring results for counselling services¹ the findings presented as 'were you successful', are actually a response as to whether or not the recipient was able to move forward at least one step, not whether or not they were able to complete the certification process or use it to access services. Analysis of results tends to be limited to donor reporting and not programme improvement. As such, NRC should:

- Expand outcome monitoring to legal assistance recipients to improve understanding of satisfaction of services and recipients' perception of whether cases have been successful or not. Re-emphasise to field staff the importance of timely and accurate data entry so information management and sampling can correctly identify the service an individual (and their spouse) received;
- Ensure outcome monitoring for counselling services captures the end results of the refugees' attempts to complete the civil documentation registration steps or the legal residency steps;
- Re-define what 'success' means for outcome monitoring from a recipient perspective, rather than an NRC metric;
- Ensure outcome monitoring results are used for programme improvement and not just donor reporting.

10. Review the responsibilities of different team members: NRC will need to review the roles and responsibilities of different team members to see if services can be delivered using fewer resources. In this regard:

- NRC should review if there are ways to increase the responsibilities of IFPs. These could include providing greater support on in-take and follow-up of cases, and the identification of more vulnerable and hidden populations;

1. "ICLA Lebanon Outcome Monitoring 2019", results presentation

- NRC should also review whether ICLA staff could take on some of the work of lawyers on the more straightforward cases; particularly staff who have been with the project for 3-4 years should have a strong knowledge of case needs.

11. Explore partnerships and/or public interest litigation on legal residency with domestic legal providers to increase capacity and entrench expertise within the Lebanese legal community. To entrench sustainability and address the problems of reduced funding, NRC should also focus on increasing domestic capacity to provide support to refugees and other vulnerable groups.

12. Continue to scale up work on legal residency with a particular focus on legal assistance. Although it is acknowledged the political environment for increasing legal residency is difficult, it is recommended that NRC focus more of its resources on supporting legal residency cases where possible. It would be anticipated the level of support needed by refugees is likely to be legal assistance because of the barriers placed on refugees and the inconsistent application of agreed procedures by different General Security Offices (GSO) and individual officers.

13. Conduct an assessment of financial costs to recipients because of ICLA services, including costs related to unreasonable delays. To address this, NRC should:

- Conduct an assessment on causes of internal and external delays to ICLA services;
- Identify ways to reduce delays in areas within NRC's control;
- Conduct an assessment of the various costs borne by ICLA recipients;
- Identify ways to reduce or eliminate such costs through initiatives such as expanded mobile clinics, more systematic callbacks or WhatsApp messaging;
- Consider reimbursement of expenses where unreasonable delays have led to additional costs for the recipient.

14. NRC should explore programmatic and/or advocacy cooperation and coordination between the Lebanon and Syria ICLA programmes. Information on what refugees in Lebanon will need in order to complete paperwork in Syria should be included in verbal and written advice and leaflets to refugees in Lebanon.

15. Strengthen coordination both internally with other core competencies and externally with the humanitarian community working on legal issues, UN agencies, and donors by ensuring the sharing of data for common advocacy goals. In particular, ICLA should:

- Provide regular analysis and dissemination of (anonymised) ICLA data to external stakeholders to strengthen case-specific and policy advocacy. For example, ICLA could compile an evidence base of non-implementation of government policies at specific GSO offices and share with donors/humanitarian actors/UNHCR to support advocacy on these issues;
- ICLA should undertake a power mapping and stakeholder analysis to identify regional and local advocacy targets where NRC could intervene directly or through interlocutors, particularly on non-implementation of official government policies.



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