

Taking on the Triple Crisis

Civil society perspectives on supporting Lebanon in its response to the concurrent Syria, economic and health crises.

Joint Civil Society Report ahead of Brussels IV Conference on the Future of Syria and the Region

June, 2020.







Taking on the Triple Crisis Joint Lebanon CSO Report ahead of B4C

Close to ten years into the Syria crisis, Lebanon is more fragile now than ever before, reducing its immediate ability to provide asylum space to refugees. The likely deterioration of the economic situation in Lebanon into 2020, will require both the humanitarian and development community to respond to increasing needs amongst refugees (both Syrian and Palestinian), in addition to current and emerging needs amongst vulnerable Lebanese communities. The onset of COVID-19 has exacerbated socio-economic vulnerability, with the full extent of related lockdown measures not yet revealed. Worrying signs are already seen with inflation of the Lebanese lira, which is wiping out the value of incomes and aid assistance, in addition to rapidly rising unemployment.

The crisis does posit an opportunity to make progress on structural challenges and reform efforts, however, Lebanon still urgently needs humanitarian assistance to mitigate the worst social and economic impacts of the triple crisis currently confronted. Outlined below is the common analysis, situation reports and recommendations to key stakeholders from members of the Lebanon Humanitarian INGO Forum (LHIF), Lebanon Humanitarian & Development NGOs Forum (LHDF) and Persons Affected by the Syrian Crisis (PASC) networks active on the Syria crisis response in Lebanon. The joint Civil Society organizations' (CSO) report explores:

- 1) Economic growth and livelihoods
- 2) Health and WASH
- 3) Education
- 4) Protection



"How does one live with no job, no money, no assistance? We're all indebted to shops. I can barely buy bread, lentils and burghul, and do not have the financial means to buy detergents and disinfectant items. Our priority today is to feed our family."

Rama, Syrian refugee, West Bekaa

Economic growth and livelihoods

From late 2019 and into 2020, Lebanon's population continued to experience multiple socioeconomic shocks due to the unstable political context, emerging health emergency of COVID-19 and an economy on the brink of collapse. These events continue to negatively impact on the most vulnerable communities in the absence of well-established safety net and social protection programmes.

Following the protests that erupted across Lebanon, capital control measures were imposed by the banking sector. A scarcity of US dollars has restricted Lebanon's access to international markets, leading to shortages of essential imported goods. Further, the Lebanese Lira has lost 60% of its value - and climbing - against the USD as an unofficial black market has emerged. The currency fluctuations have led to dramatic price increases for basic goods, as Lebanon's economy is highly import-dependent. On 9 March 2020, the Lebanese government did not repay a \$1.2bn Eurobond, the first sovereign default in the country's history.ⁱ

In the fallout, numerous businesses have stopped operating, laying-off employees or otherwise reducing their working hours or cutting their salaries. An estimated 12% of formal businesses have closed since October 2019, and an already high unemployment rate has increasedⁱⁱ. An estimated 220,000 people lost their jobs between October to January 2020 in the formal sector aloneⁱⁱⁱ. Unregistered, informal businesses are likely to be impacted as well although no official data exists^{iv}. The situation was exacerbated by lockdown measures applied in March 2020 to limit the spread of COVID-19. The International Labour Organization's (ILO) recent *Rapid assessment of the impact of COVID-19 on vulnerable workers and small-scale enterprises in Lebanon*, reveals that 84% of respondents were permanently or temporarily laid-off from work due to the COVID-19 crisis, with almost twice the share of Syrians permanently laid-off than Lebanese. The main implications of the lockdown for small-scale enterprises is reduced sales and revenue loss, reported by more than a half of respondents.^v

Vulnerable Lebanese, Syrian refugees, Palestinian refugees from Lebanon (PRL) and Palestinian refugees from Syria (PRS), in addition to other vulnerable groups such as migrant workers, are increasingly unable to meet their basic needs. More and more food, health care, medication and critical items are beyond their reach. A further inability to pay rent, is causing an increase in eviction threats.^{vi} Crisis-affected populations are at an increased risk of adopting negative coping strategies, such as child labour, child marriage, school drop-out and are subject to exploitation and abuse^{vii}.

World Bank estimates in November 2019 noted more than 50% of the Lebanese population could fall beneath the poverty line in 2020 if economic challenges were not addressed.^{viii} In a country with no unemployment benefits and fragile social security nets, an unemployment crisis has grave implications not only for the economy but on the very social fabric of the country.

Lebanon's economic recovery and long-term development objectives and commitments are clearly at risk^{ix}. The *Lebanon Crisis Response Plan* (LCRP) livelihoods sector struggled to ensure the sustainability of the approx. 4200 jobs that were created or maintained in 2019, and the approx. 2000 micro, small or medium-sized enterprises (MSMEs) supported. The situation is expected to deteriorate, making it very difficult for livelihoods actors to meet their targets in the

context of economic stagnation, high unemployment, and an unfavorable enabling environment for business^x.

At the national level, the ministerial statement adopted by the cabinet in February 2020, and the Economic Rescue Plan (ERP), validated by the Government of Lebanon (GoL) in April 2020, aims to rescue Lebanon from the total financial collapse^{xi}. However, the ERP anticipates the implementation of an International Monetary Fund (IMF) programme, which if realized, will take several years to fully commence. Without strengthened social safety nets and bolstered basic assistance to ease the pain caused by required structural reform, vulnerable Lebanese and refugees will be pushed further into poverty and extreme poverty.

The challenges facing the livelihoods sector

Even before the announcement of "the state of economic emergency" in September 2019, and the declaration of "medical state of emergency" related to COVID-19 in March 2020, the livelihoods sector was facing several challenges. This is despite the attention given to economic opportunities and jobs at the London Conference in 2016, and the Brussels conferences in 2017, 2018 and 2019. Whilst the LCRP Livelihoods sector's funding level has nearly doubled since 2016, livelihoods remains one of the most underfunded sectors of the LCRP as of December 2019^{xii}. In addition, the sector's appeal does not reflect livelihoods needs at country level, rather the interest of donors to fund this sector and the framework put forward by the Government of Lebanon to organize it. This has restrained the design and impact of livelihoods' interventions. Whilst the overall lack of jobs being generated within the Lebanese economy is a challenge facing all of Lebanon, regardless of nationality and gender, Syrian refugees face additional and acute challenges.

As per official government policy, Syrian access to formal work is limited to the three sectors of agriculture, construction, and cleaning (or environmental services). Furthermore, the General Security Office (GSO) has been requesting Syrians who wish to work in Lebanon within the allowed three sectors to obtain a "pledge of responsibility" signed by a Lebanese sponsor who is held liable for their actions. As a result, it is very difficult for Syrians to get access to formal work or to acquire and maintain legal stay in Lebanon without a sponsor^{xiii}. Starting June 2019, the implementation of the Ministry of Labour's (MoL) initiative targeting undocumented foreign workers, for several weeks, resulted in numerous fines and shop closures with negative repercussions for poor Syrians and Palestinians working informally. Nevertheless, the Livelihoods sector contributed to creating temporary (3 months) employment for around 17,400 people as a result of the increased investment in municipal infrastructure that reached USD \$15.1 million in 2019^{xiv}.

Moreover, the lack of legal documentation and related freedom of movement constraints, are the main barriers impacting the ability of Syrian refugees to participate in livelihoods programmes. Other barriers include the lack of decent work conditions including irregular payment of wages, exploitation and a lack of minimum safety standards.^{xv}

From late 2019, livelihoods actors reported an increased demand from Lebanese to be employed in temporary employment initiatives. This highlights that income-generation opportunities are sought after by all vulnerable groups, regardless of gender, age or nationality. Conversely this also serves to highlight the increased risk of social tensions due to competition over jobs and opportunities provided by aid programmes.

Preventing escalation of economic grievances and addressing different types of vulnerability

In order to serve the most vulnerable communities, in such a volatile and challenging context, livelihoods actors are re-thinking their programmes with a focus on limiting the short-term impact of the crisis on the most affected individuals and MSMEs while planning for more realistic mid- and long-term recovery strategies. In the current context, the livelihoods sector has an essential role to play in preventing vulnerable groups from falling further into poverty. Below is a set of recommendations to livelihoods actors, donors, UN and the Government of Lebanon addressing short-term programmatic issues, in addition to the mid- and long-term policies and strategies required to effect meaningful change.

Short-term recommendations:

- Donors to ensure continuous and timely engagement with NGOs to explore adaptive livelihoods programming with the capacity for scale-up.
- Donors to ensure the sustainability and flexibility of livelihoods sector funding and to refrain from diverting funds without consultation.
- Donors to advocate with GoL to implement ILO recommendations on flexible work permits.
- Donors to focus on financial inclusion through supporting sustainable financial institutions, in particular microfinance institutions, in providing access to finance and grants to Micro, Small & Medium Enterprises (MSMEs).
- GoL to ensure access to finance, in particular through microfinance institutions, and provide financial support or recovery subsidies to small businesses in order to support economic recovery. Policies to support MSMEs to stay afloat during the recovery period are critical.
- GoL to reduce credit risk for businesses and impact of banking restrictions, along with the Central Bank. Explore the restructuring of loan payments schedules, providing low interest working capital with flexible terms to support businesses, the cancelling of fees or additional interest charges on late repayments as a result of the crisis.
- UN and NGOs, including livelihoods actors to strengthen collaboration with relevant ministries (Ministry of Labour, Ministry of Trade, Ministry of Finance, Ministry of Agriculture, Ministry of Energy and Water) to support Lebanon's economic recovery plans and objectives.
- GoL, UN and NGOs to coordinate and harmonize processes to provide social, financial, and in-kind assistance to vulnerable communities (*ie. access to updated National*)

Poverty Targeting Programme (NPTP) database/Municipalities database used by the Ministry of Social Affairs (MoSA) *for the response to COVID-19 lockdown*).

 UN to urgently fill knowledge gaps about the vulnerability of poor Lebanese and refugee populations at national level, in coordination with the local authorities, including their economic situation and disaggregated impacts of COVID-19.

Livelihoods actors to:

- Support the resilience of MSMEs, in a value-chain approach, to keep local production functioning to provide income generation and ensure that essential goods and services continue being delivered.
 - In addition to the financial support through grants, or access to finance, MSMEs would need technical support in cash management, adaptive business development planning including crisis management, support to building linkages with sustainable financial institutions and relevant local and national markets.
- Boost temporary employment programmes, in collaboration with local associations and municipalities, and in line with their local economic development plan, to create fast income-generation opportunities for those most in need while providing essential services to local communities including support to the public health response.
- Invest in the agricultural and agro-food sector through:
 - $\circ~$ Engaging with cooperatives and small producers, and linking them with skilled field workers.
 - Supporting agricultural and agro-food MSMEs throughout the entire value-chain to boost production and distribution, while improving quality and competitiveness, to allow a greater food supply for local and national markets.
- Implement joint Livelihoods programmes engaging Lebanese, Syrian, Palestinians, and other nationalities in a value chain approach, in order to contribute to and enhance social stability.
- Deliver financial literacy training programs to vulnerable populations.
- Implement rapid and regular labour market assessments at local levels to understand the needs in terms of jobs and expertise and explore concurrent livelihoods opportunities.
- Promote technology solutions that can provide market-based crisis adaptations. The current crisis has highlighted the effectiveness of digital livelihoods service delivery mechanisms, including digital support to businesses and electronic fund transfers.
- Support the scale-up of the public health response through the inclusion of skilled refugees, especially healthcare professionals at community level.
- Strengthen coordination between livelihoods partners to complement existing programmes that are already developing successful value chains and creating an intertwined and mutually beneficial network.
- Mainstream livelihoods across LCRP sectors, to create linkages and improve referrals, for instance with the Basic Assistance and Protection sectors in addition to women's economic empowerment programmes.

 Document collective learning on the capacities that contribute to MSMEs' resilience, so that the efforts can be scaled up and replicated into livelihoods programming.

Medium and long-term recommendations:

- Donors to take a more integrated, rather than project-based, approach to funding support across the board to vulnerable communities in Lebanon and commit to increasing multi-year funding support.
- Donors to provide multi-year funding in livelihoods to allow organisations to build programmes, structures and capacities of local actors.
- Donors to advocate for the establishment of a monitoring framework to track the implementation of CEDRE reforms and plans including the Capital Investment Program (CIP) and to follow the implementation of the ERP and measure its socioeconomic impact.
- Donors to support GoL to expand safety nets vertically, i.e. larger benefits to cover additional needs, and horizontally, i.e. including additional people. Donors should also promote agility through suspending conditionality and restrictions on use.
- GoL to implement a reform agenda that stimulates economic growth and an enabling environment for the creation of new job opportunities.
- GoL to implement a decent work agenda for the benefit of all workers in Lebanon and provide adequate support for structural improvements to underpin social safety initiatives, while requiring the enforcement of labour safeguards.
- Donors, UN and NGOs to advocate for the adoption of relevant refugee-inclusive policies that would benefit Lebanon in containing the COVID-19 outbreak and in support of economic recovery efforts.



"When I first got pregnant, I was terrified and I didn't have enough information about reproductive health. Assistance came at exactly the right moment. I've always trusted my mother's advice, but speaking to health experts made me feel more comfortable and relieved about my body and my pregnancy."

Maha, 21-year-old Syrian refugee, Al Ain, Bekaa

Health and WASH

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Accessing healthcare remains a challenge for all vulnerable people in Lebanon. Over the course of 2019 and so far into 2020, interventions in the health sector have continued to halt the deterioration of the health status of vulnerable populations in Lebanon. Local and international NGOs have worked to increase the resilience of the health system overall and have focused on ensuring access to essential quality primary health services, referral to hospital care, emergency response to health priorities and hazards. This can be evidenced through accelerated immunization in response to outbreaks and the rapid response to the COVID-19 pandemic.

Despite this progress to bolster the primary health care system with donor support, the onset of COVID-19 and the deteriorating economic situation, puts at risk the realization of universal health coverage. Further, the health sector is still missing a harmonized and well-aligned delivery and cost-recovery model, including a transparent Health Information System (HIS).

In general, for both primary and hospital care, cost of treatment was, by far, the main barrier to accessing the needed care for refugee and host communities^{xvi}. Deteriorating health status for both refugees and vulnerable host communities is expected, given the worsening socio-economic conditions in Lebanon. Recent COVID-19 lockdowns, have further exacerbated the situation, increasing unemployment and reducing the ability to access primary, secondary and tertiary health care. The restriction of movement and increased stigma and social tensions towards refugees also led to ongoing health access constraints.

In parallel and during the last quarter of 2019, local and international NGOs reported that Lebanese seeking NGO-provided health services both in Primary Health Care Centers (PHCCs) and in mobile medical units (MMUs) increased by 20-30% for different types of health services, including for specialized services for children with disabilities and patients with chronic diseases. Patients highlighted that they were no longer able to afford the costs of the private health system.

The delivery of healthcare services has been negatively impacted by the devaluation of the Lebanese lira. The sector witnessed a 30-40% increase in the price of the imported medical supplies and the lack of availability of many supplies due to decreased cash flow. Since the end of 2019 there have been recurrent shortages of chronic and acute disease medications due to the inability of the government to transfer the allocated budget in 2019. Because of the socio-economic situation, hospitals are reporting increased difficulties to pay staff, provide drugs and care.

With decreased access to healthcare, compromised livelihoods, and increasing food insecurity (exacerbated by COVID-19), services targeting mothers and children are, more than ever, lifesaving. This includes antenatal care and postnatal care services, nutrition, breastfeeding, and malnutrition support, pediatricians, and immunization. For mothers, there is an increase in concerns regarding general health status, sexual and reproductive health, and nutritional status whereas for children (especially under 5), there is an increase in concerns regarding their general health, nutritional status and immunization.

Growing mental health needs

Over recent months there has been a marked increase in requests for Mental Health and Psycho-Social Support (MHPSS) services. However, people with mental health conditions are not always able to access services due to stigma, lack of knowledge about availability of services, financial issues and security on the roads. For many with chronic mental health issues this results in an inability to commit to medium-term treatment.

The current situation in Lebanon presents high risk factors for vulnerable communities including youth showing mental health and substance use problems due to job losses, dropouts from the educational system, confinement, external stressors and the aggravation of psychiatric comorbidities. For instance, due to confinement measures, the number of calls reporting domestic violence to Lebanese Internal Security's hotline increased by 100%. The calls to the *Embrace Lifeline* (people in emotional distress and/or experiencing suicidal ideation) have doubled on a monthly basis as of December 2019. It confirms the need of improve the referral between the health and protection sectors.

Meeting these increased needs has proven challenging for many NGOs, with some facing funding gaps and forced to adopt an emergency approach (i.e. reducing services) and/or suspending their support to service provision entirely. Given the limited number of donors supporting the health sector, fundraising is still challenging in 2020. As per the feedback provided by community workers, the needs are increasing for treatments which were already under funded, in particular for dialysis and cancer. This challenge is compounded by the inability to fundraise locally due to the economic crisis. Significant donor support and resourcing is required to maintain service delivery. At the same time, alternative approaches are required to mitigate the impact of the increase in demand for affordable healthcare and prices of essential medications.

More than ever, the Lebanese healthcare system is in need of support. Whilst numerous risks are posed to the sector there are also a number of opportunities to intervene to ensure accessible healthcare for not only for the Syrian refugee community but also to meet the emerging needs of other vulnerable communities. Strengthening the public health system will realize impact beyond the scope of the Syria crisis. The onset of COVID-19 confirms the urgent need to ensure that all populations can access healthcare in Lebanon.

This is an opportunity for the Government of Lebanon (GoL) and Ministry of Public Health (MoPH), with the support of all relevant stakeholders, to push for a better system for all through continuing progress toward Universal Health Coverage (UHC). Striving towards universal accessibility will help to support equitable and affordable healthcare without vulnerable people being forced into financial ruin. Such an approach is aligned to the Ministry of Public Health's own *Strategic Plan* for 2016 to 2020. Failure to do so will only result in social instability, deteriorating health status for all and a loss of progress made to strengthen the health system from recent years.

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Insufficient access to clean water and sanitation services significantly affects the health status and the dignity of all individuals. Informal Tented Settlements (ITS) in particular are more vulnerable to COVID-19 outbreak: they are overcrowded, with sometimes limited access to clean water and sanitation. In addition, they rely almost exclusively on costly and infrequent water-trucking and desludging services. The World Health Organization (WHO) recommends frequent handwashing and social distancing which is almost impossible to practice in such settings.

In addition, the continued deterioration or the economic situation in Lebanon is affecting citizens' trust in the authorities' ability to provide quality public services (notably water and wastewater management) in general. This decreases their willingness to pay water service fees. As a result, the Government of Lebanon is experiencing a reduction in available budget resources for general operations of existing infrastructure and in particular operations and maintenance. This could drastically affect the quality of services nationwide, hitting the most vulnerable refugee and host communities the hardest. The degradation of quality and reliability of water supply in vulnerable areas will equally affect hospitals, PHCCs and clinics serving those critical areas, potentially increasing COVID-19 transmission more broadly.

Recommendations:

Donor governments and the humanitarian/development community to:

- Advocate for and continue to support a holistic healthcare model which is affordable, accessible and equitable; with rehabilitated infrastructure, using harmonized and aligned health service packages including ante and post-natal care, integration of mental health and psychosocial support (MHPSS) in primary health care; improved inclusion of people with special needs, women, girls and Sexual and Gender Based Violence (SGBV) survivors, and harmonized insurance schemes with affordable out-of-pocket expenses for hospital care.
- Build a strong national health information system (HIS) that links primary health care to secondary healthcare in terms of continuity of care, where admitted patients have referral follow up at PHCs after hospitalization (through an agreement with UNHCR and MoPH - for refugees).
- Prioritize and implement a preventive inter-sectoral approach including support to:
 - Life-saving activities in Water, Sanitation and Hygiene (WaSH), (increase safe water supply standard to a minimum of 60 litres per capita per day and proportionally increase desludging activities), COVID-19 prevention kits distribution, shelter (site-improvement) and energy (fuel) in ITS.
 - Water and wastewater network connections to ITS which could result in the reallocation of funding currently used for cyclical interventions towards broader community infrastructure works to reinforce communities' resilience in the longer term. These include water supply and wastewater treatment systems.
 - Works in sub-standard buildings for vulnerable populations facing health risks to limit shelter downgrading, ensure security of tenure and improved living conditions.

- Continued community-based outreach activities including additional targeting of nonserved groups with high vulnerability to ensure dissemination of key messages on public health (including on COVID-19), appropriate and timely access to primary and secondary healthcare (e.g. on transport and testing cost coverage) as well as utilisation of good family health practices in regard to mother child health (including vaccination programmes), safe water and nutrition.
- Support an in-depth assessment of human resource requirements in the health sector, including at the MoPH level, with appropriate financing mechanisms and prioritize securing reliable supplies of acute and chronic medication.
- Improve healthcare access for marginalized populations by providing funding for outreach activities and reinforcing collaboration between the Ministry of Public Health and Ministry of Social Affairs (MoSA) to include Social Development Centres in MoPH's network of PHCs and support their community role to ensure social protection.
- Support social benefits by harmonizing insurance schemes with affordable out-ofpocket expenses, updating current healthcare packages and consider expanding it to offer comprehensive services to people in need and reduce the burden of the hidden cost and non-subsidized services.
- Support health preparedness and response by addressing shortage of supplies and mainly PPE, ensuring its sustainability and mitigating procurement constraints due to inflation by strengthening Lebanon's public health system capacity.
- Strengthen national epidemiological surveillance through supporting HR support in this unit as well activating a post-COVID-19 community-based surveillance system that would enhance early detection and referral for any communicable disease.
- Examine all possibilities to increase funding available for health, water, sanitation and hygiene interventions for refugees in Lebanon, including awareness, to meet significant needs.
- Advocate to the Government of Lebanon for more sustainable water and sanitation solutions, including through easing of restrictions regarding connections of ITSs to national networks.
- Continue to advocate to the government to prioritize sufficient resources are made available to ensure water and wastewater system operations can take place to ensure quality public service provision. Support the government and water authorities in particular to guarantee necessary capacity for quality public service provision.
- Increasing the support towards insurance coverage for secondary care for all populations in country and expand it to chronic diseases.

Government of Lebanon, with the support of the donors and the humanitarian community, to:

- Develop an efficient and effective social health protection systems to address the gaps in coverage and financial barriers to accessing health care.
- Preserve and improve public spending on health care and adoption of government financing modalities required to achieve Universal Health Coverage (UHC).

- Strengthen partnership with local and international NGOs, with the support of the relevant agencies (donors, UN, etc.), to ensure the right to healthcare for all in Lebanon.
- Propose a framework for NGO contracts with hospitals and PHCs to harmonize packages and improve the monitoring of service quality based on MoPH guidance.
- Strengthen the public health system and revise MoPH agreements with private hospitals to ensure quality of care towards the creation of a unified and public health system increasing the number of public owned facilities.
- Support the implementation of more sustainable water and sanitation solutions, including through easing of restrictions regarding connections of ITSs to national networks.



"My dear son, live your day to the fullest. Go to school early and finish your homework. The rest of your time we will spend it together. We will watch movies, draw and paint, we will do different activities. I'm waiting for you, don't be late. I love you so much."

A message from a mother, to her son, as part of a parenting skills and child protection activity.

Education

Taking on the Triple Crisis Joint Lebanon CSO Report ahead of B4C

The London Syria Conference in 2016 and subsequent conferences committed to the ambitious goal of access to quality education for every vulnerable child, as embodied in the *Reaching All Children with Education (RACE) 2014-2021 National Strategy*. According to the Independent Monitoring Report on Lebanon's previous conference commitments, around 206,000 non-Lebanese children were enrolled in primary public schools at the end of the 2018/2019 school year. Preliminary data indicates that 205,700 non-Lebanese children were enrolled in primary public schools for 2019/2020. There are usually around 5,000 non-Lebanese children enrolled in secondary public schools^{xvii}. Despite significant efforts, the number of Out of School Children further increased; in 2018-2019 there were 347,164 (58%) refugee children aged 3 to 18 out of school with 319,915 (48%) children out of any MEHE recognized form of learning^{xviii xix}.

The spread of COVID-19 combined with the pre-existing economic crisis in Lebanon has compounded educational constraints and barriers. Schools were closed between mid-October and November 2019 due to protests and resulting access constraints. Furthermore, registrations for the 2019/2020 school year were delayed due to teacher strikes and the Ministry of Education and Higher Education (MEHE) budgetary constraints, which led to a temporary suspension of the second shift in public schools. By the end of February 2020, all schools were closed due to threat of COVID-19. In May 2020, the Minister announced the end of the school year instructing that it is to be completed via distance learning. To date, there is no clarity on what that means for children in second shift and non-formal education. Furthermore, the declining economic situation has taken a toll on Lebanese households where Lebanese children are moving from private to public schools due to the inability of families to pay schools fees (16,000 during the current school year according to preliminary registration data^{xx}) and this trend is expected to increase in the next scholastic year 2020-2021, putting additional pressure on an already over stretched education system.

Moreover, at present the private school education system is facing existential challenges with more than 700,000 students; 59,000 teachers and 15,000 school administrators at risk of losing their positions due to the economic crisis.^{xxi} If this happens, the morning school shift will have to increase in capacity to cater for the influx of Lebanese children into the public system and may likely push Syrian refugees in the AM shift to the second shift or out of learning completely. It should also be noted that one key barrier to education that pre-existed the current crises for Syrian children is the cost of transportation^{xxii}. Given the increased economic vulnerability of refugee households, this is likely to be an even bigger obstacle now.

The education sector in Lebanon is facing a number of challenges, which can be categorized into three main headings: Access challenges as a result of the current economic, political and health situation; coordination challenges related to the regulations which govern the education response and system-related challenges.

Challenges related to access

The closure of formal and non-formal education (NFE) both as a result of the political and economic situation since October 2019 and of COVID-19 starting March 2020 has significantly curbed the right of all children in Lebanon to an education. While schools have tried to mitigate the former closures by condensing holidays and adding on to the school year, the latter closures related to COVID-19 were more challenging as they resulted in the premature ending of the school year. To mitigate this, MEHE has developed a distance learning strategy, which only takes into consideration the formal education sector and is in most cases not implemented consistently for second shift. This has left the majority of Syrian students completely out of learning. Furthermore, it requires having minimum resources of technology and data bundles, TVs, cable and electricity which is not available for all vulnerable children including Lebanese and Palestine Refugees from Syria^{xxiii}. Continued learning opportunities for those children attending MEHE-implemented Accelerated Learning Programme (ALP) is in question, noting that the majority of these students attended one or more NFE cycles implemented by NGOs before ALP.

When it comes to non-formal education (NFE), during March, April and May 2020, NGOs actively coordinated to provide remote non-formal education as part of the COVID-19 response focusing on three domains: Learning, Child Wellbeing and Health Promotion. Discussions are ongoing with MEHE to ensure that children who were engaged in remote learning can access formal education where relevant in the next school year and to discuss options for the summer 2020 cycle, looking into different approaches, particularly blended and distance learning options^{xxiv}.

Challenges related to coordination

Over the past year, challenges persisted in the education sector particularly those related to the Standard Operating Procedures (SOP) that regulate the formal education sector as they have not been consistently implemented across schools and new requirements are not always well understood and followed. This is particularly true in the request for Community-Based Early Childhood Education (CB-ECE) Level 3 MEHE certification before enrolment from some public schools, despite this requirement not being mentioned in the SOP. MEHE started a process of reviewing CB-ECE which was interrupted due to COVID-19 and resumed in May 2020. It is vital that MEHE prioritizes SOPs of non-formal education well before the start of the next academic year to ensure that children do not again face challenges to enrollment in formal education at schools.

Insights from the field

A recent NGO-produced research report used quantitative and qualitative methods to understand the lived realities of Syrian children in school, both in formal and non-formal education and those who are out of school^{xxv}. The objective was to inform education programmes and outreach and ongoing conversations on opportunities and challenges in the wider education sector in Lebanon. The report findings focus on retention factors and existing barriers to education, which are now exacerbated by the ongoing economic and public health crises in Lebanon. As it relates to the some of the challenges faced by children who try to register in MEHE public schools, the research found:

- Out of the total 443 children surveyed, 29% had at least once been denied access to school. Only about a quarter of those students sought help.
- The effect of the real or perceived denial from accessing school is significant. A child who has been denied enrolment previously is almost three times more likely to be out of learning than a child who has never been denied schooling.
- 66% of surveyed children out of learning think they do not have the possibility to register again, and 60% say they would register again if they could, implying that they think that they cannot enrol. This indicates a concerning low level of awareness about available support from aid organisations in this regard. Three-quarters of the total 443 children surveyed think there are no organisations who can support them with schooling.

In terms of non-formal education (NFE), the NFE policy was launched in 2019. MEHE finalised a new Basic Literacy and Numeracy (BLN) curriculum which has not yet been shared with education actors. There are concerns that although this curriculum should increase the quality of BLN, it would require implementing partners to adapt to new, less flexible standards, creating challenges in implementation and decreasing the number of children reached through BLN with similar levels of funding. Questions still remain around the transition from non-formal to formal education which is currently low: when more flexible and simple pathways can be implemented to improve the transition, and if transition were to improve, how these children can be absorbed into the formal system.

When it comes to technical and vocational education and training (TVET), efforts to improve TVET have continued in 2019; however, there are no clear pathways for youth to be able to transition between Youth BLN and vocational education.

Challenges related to system strengthening and improved quality of education

While a child protection policy exists, there is still a lack of accountability measures as to its roll out and implementation in public schools. Moreover, key monitoring frameworks and tools such as a national learning assessment strategy, a national teachers' assessment framework and the observation tools set out under *RACE* pillars 2 and 3, still do not exist, which makes it hard to assess the quality of teaching and learning. The lack of a unified system for data collection is another major challenge in the response as it is hindering the ability of education actors to conduct sound performance measurement, cost-efficiency, and transparency of financial and delivery data.

Recommendations:

Donors to:

- Continue to commit to large-scale, multi-year financing to exclusively support access to free education for all.
- Support adapted, flexible and inclusive learning pathways and education programming that incorporates elements of social protection and are resilient to the various political, economic and health related shocks in the country allowing for equal access to quality education opportunities for all.
- Support interventions that address the root causes of drop out from school and barriers of access to education, including school closures, lack of capacity in formal education, the cost of transportation, lack of provision of diplomas, the language barrier, families' economic vulnerability, child labour, lack of teacher training, lack of psychosocial support, and violence in and around schools.
- Be flexible when it comes to the re-programming of existing funding, in addition to ensuring new funding streams that can support education response adaptations amidst COVID-19 and broad-based insecurity/emergencies resulting in school closures.
- Invest in IT support and distance learning to both schools and students, with equipment and technology which are affordable and user-friendly. IT/distance learning should be a support to schooling and not a substitution of schooling.
- Support complementarity in approaches between income earning and education interventions for parents/caregivers: cash for work/conditional cash transfers for households who have no access to income to secure access to education of children. This action could prevent other types of risks such as child labour.

Government of Lebanon to:

- Continue its effort for a significant increase in the number of students into education.
- Develop minimum standards for NFE blended or distance learning opportunities to ensure rapid scale up of programs ensuring at the same time sufficient flexibility for education actors to build on their own experience; including providing access to MEHE whitelisted sites for NFE providers, children and caregivers.
- Expand non-formal education opportunities tailored to the needs of children of all ages (including BLN for children age 8 and 9) and academic experiences regardless of whether or not they will transition to formal schooling; this includes children who currently cannot access first or second shift schools or ALP (including children in work, early marriage and with special needs), and after-school tutoring to minimize drop-out rates.
- Simplify pathways to formal education, ensuring that children who complete Basic BLN can transition directly to Formal Education as per the current and previous versions of the MEHE regulatory NFE framework.
- Adopt a collaborative approach and consult with civil society organizations, the private sector, representatives from the regional districts, municipalities and parents to develop and endorse a quality learning for all strategy that encompasses both formal

and non-formal education and children with disabilities regardless of nationality. The strategy should be innovative, rethinking education following on the current political and socioeconomic situation and reinforcing the Lebanese education system while ensuring Lebanese and refugee child rights to education.

- Support a zero-tolerance policy towards violence in and around schools including bullying and report on all cases as per the recently instituted referral system. The referral system should align with other national systems which should be extended to both formal and non-formal education programmes.
- Adopt a unified data system for all children enrolled in education and implement a clear monitoring framework for education in Lebanon, reporting results regularly on a sector level^{xxvi}. This should be coupled with an improved coordination mechanism for the education sector to foster joined-up analysis and action.



"The hospital gave me a birth notification for our daughter, Sahar, and the Mukhtar gave me her birth certificate but with the wrong place of birth, I didn't know I had to sign the document at the local Nofous office before she became one year old. When I reached NRC office for consultation, my daughter was already over a year old. They informed me about the government of Lebanon announcement of retroactively waiving the one-year deadline to register Syrian children born in Lebanon between January 2011 and February 2018. I was really relieved when I learnt about the new policy which facilitated the birth registration of my daughter. We saved time and money."

Bakri, 31 years old, Syrian Refugee

Protection

Protection issues in Lebanon have been exacerbated by recent contextual developments. Assistance to vulnerable Lebanese, Palestinians, Syrians, and migrant workers became a protection priority. Other events have also had an impact on refugees' lives in Lebanon. Following a decision by the Higher Defense Council (HDC) more than 2,700 Syrians were summarily deported from April 24 to the end of August alone, violating the principle of non-refoulement. Summary deportations have continued since August 2019 meaning that the true figure is much higher^{xxvii}. Furthermore in June 2019, the enforcement of the Ministry of Labor (MoL) plan against foreign workers without the required work permit (which went unenforced for years), resulted in thousands of Syrians and Palestinian refugees being let go by their employers^{xxviii}.

Legal Residency Status and Civil Status Documentation

There has been a general deterioration in providing civil documentation and temporary legal residency to Syrian refugees even as some positive steps have been achieved since Brussels III. The number of Syrians with legal residency has decreased from 2018 to 2019 and now stands at only 22% of individuals aged over 15^{xxix}. This has been accompanied with slow progress in increasing the capacity and timeliness of the Directorate General of General Security (DGGS) in processing legal residency applications. As such, a key challenge in 2020 will be increasing this processing capacity and clearing the large backlog of temporary residency applications as a result of the halt to processing from the COVID-19 lockdown, economic crisis and protests.

Apart from the DGGS's processing capacities, there was a decrease from 2018 to 2019 in the number of Syrians approaching the DGGS to renew their legal residency (60% to 51%) and a decrease in the number of refugees registered with UNHCR (33% to 28%).^{xxx} This is explained in part by deteriorating trust in the authorities, inability to afford renewal, travel restrictions from municipalities and roadblocks related to protests^{xxxi}.

It is important to note that there have been positive steps taken by the Government of Lebanon in increasing the number of birth and marriage registrations. Almost 97% of newborn children had their birth registered by a medical professional; while there was an increase in marriage registrations at the Foreigners Registry in 2019 from 6% to 26%^{xxxii}. This trend has been supported by simplifying the registration process for births and marriages, although disruption to accessing public offices caused by COVID-19 will likely have a deleterious impact on registrations in 2020 due to backlogs leading to processing delays.

Recommendations:

- The Government of Lebanon (GoL) to honor previous commitments in terms of legal residency and civil documentation:
 - Ministry of Interior and Municipalities (MoIM) General Security (GSO): to increase the capacity to process residency applications and renewals for Syrian refugees. To implement and expand the fee waiver for legal residency.

- MoIM Personal Status Department: to extend the waiver for late birth registration for children born after 9 February 2019; and simplify the death registration process to increase access for Syrian refugees.
- Donors to ensure that further support to the DGGS to increase its capacity to process residency renewals from registered Syrian refugees is conditional on demonstrated positive impact (*this should also apply to support to the Personal Status Department*).
- UNHCR and GoL to consider new guidelines based on international law in resuming refugee registrations.
- GoL to implement the ILO recommendation on flexible work permits.
- GoL to lower the prohibitive fees to renew work permits for foreign workers.

Rule of Law

The rule of law has on many fronts witnessed a marked deterioration since Brussels III and it should be a priority to ensure respect for the principle of non-refoulement and nondiscrimination. In 2019, the HDC paved the way for deportations to take place for Syrians that had entered Lebanon irregularly after April 24 2019, placing Lebanon in breach of its commitment to the principle of non-refoulement in lieu of judicial review over such decisions. Even if deportations have, as far as is known, halted since the pandemic (due to Lebanon and Syria closing their borders to contain the spread of COVID-19), it must be a priority to halt deportations without due process indefinitely. This should be backed by a guarantee that authorities will not arrest or deport Syrians diagnosed with COVID-19 or for any medical treatment related to COVID-19.

The implementation of a number of ad-hoc measures from various authorities which disproportionally target refugees, have eroded the rule of law. For example, municipalities have implemented *ultra vires* curfews, which stood at 330 in 2019, restricting the movement of Syrians at certain hours.^{xxxiii} In addition, following a demolition order in April 2019 by the HDC, authorities begun the demolition of permanent and semi-permanent structures in informal settlements.^{xxxiv} At least 8600 refugees remain at risk of eviction, despite the number of collective evictions decreasing significantly from 8000 individuals in 2018 to 4400 in 2019.^{xxxv} Additionally, because of the financial crisis, refugees are at risk of being evicted due to the impossibility of paying rent.

Recommendations:

- GoL to recommit to the principle of *non-refoulement* and ensure that summary deportations without due process are halted indefinitely and not resumed after the COVID-19 related lockdowns. Deportation orders should only be issued by Lebanese courts, thus providing required judicial safeguards.
- Municipalities to end discriminatory measures and practices targeting Syrian refugees, including curfews, and guarantee that they exercise their authority within the law. The Ministry of Interior and Municipalities (MoIM) must ensure that municipalities do not act

unilaterally and outside of the law and the government must hold local authorities accountable for discriminating against refugees.

 Donors to prioritize funding to increase and strengthen the institutional capacity of the justice system.

Durable Solutions

Durable solutions have offered little hope to Syrian refugees in Lebanon.^{xxxvi} The number of resettlement submissions increased from 7808 in 2018 to 9588 in 2019 with 7442 Syrians departing Lebanon for resettlement in 2019.^{xxxvii} Yet, this is significantly lower compared to 2016, when 18,209 Syrians were resettled and there has been limited progress in finding complementary pathways^{xxxviii}. A separate concern stems from the failure to plan for the approximately 11% of Syrians that do not intend on returning.^{xxxix}

Another priority for Brussels IV is to ensure that the discussions around the revision of Protection Thresholds continue between UNHCR and civil society organizations. Additionally, the thresholds must be underpinned by international law. The question of returns will only grow in importance, especially as there was an increase in the number of refugees that decided to return voluntarily in 2019 and have been assisted in gaining civil documentation, school certificates, and vaccinations from UNHCR.^{xl} The number of returns has increased from 2016 and totaled 24,000 in 2019, even as the overall number of returnees constitute less than 4% of refugees in Lebanon.^{xli} In tandem with ensuring that the return thresholds are upheld, there should be greater focus on women's decision to return and the relative impact of various factors in driving the decision to return for Syrian women.^{xlii}

Moreover, legal work on civil documentation on the Lebanese side of the border remains a necessary precondition for updating family records inside Syria. This includes registering births to ensure legal identity for Syrian children born in Lebanon and registering relatives' deaths to allow for inheritance and access to housing, land, and property rights. Therefore, having access to legal actors prior to departure is essential for Syrian returnees.

Lastly, the existing public reference on exit and re-entry regulations for Syrians on the GSO website is not sufficiently up-to-date, clear and predictable. In practical effect, official exit policy and practice may pose a significant potential obstacle to returnees. This also hampers the work of legal actors in their pre-departure counselling offered to Syrian refugees.

Recommendations:

 UNHCR to step up its advocacy on resettlements and member states to increase the number of resettlement places and complementary pathways for Syrian refugees; in line with prior commitments on responsibility sharing; and expand alternative pathways for refugees who will be unable to return to Syria.

- Donors to ensure that funding is not prematurely diverted from the crisis response or the response to COVID-19 in host countries in order to incentivize return.
- GoL and UNHCR to ensure that all returns are voluntary, dignified, and safe; with protection thresholds for return are upheld; and that they are operationalized in a way which is transparent and accountable.^{xliii}
- UNHCR to conduct monitoring and disseminate information on the nature of returns, when available, and advise on whether they are in accordance with international law.
- UNHCR and GSO to increase and improve information-sharing on return movements, specifically with legal actors to ensure adequate counselling and legal assistance to Syrians before they return.
- UNHCR to increase access to specific information on the COVID-19 pandemic regarding places to get treatment, available treatments, vaccination, official measures, and available hotlines.
- The DGGS must provide clarity on exit and (re-)entry procedures and ensure coherent practices.

Vulnerable groups in need of specific attention: children, women and girls

Child protection, including access to education and the prevention of child labor and marriage, remains a significant concern. Furthermore, the incidences of child labor are likely to rise as the economic crisis bites even deeper, with previous research showing the worrying extent of child labor in the Bekaa even before the crisis.^{xliv} The same trend is expected in the rate of child marriages, especially in informal tented settlements where children are acutely vulnerable and where protection services have had restricted access during the protests and COVID-19 crisis. In addition, family separation is an acute protection concern with separated children constituting one of the most vulnerable groups within Lebanon. The accurate collection of statistics will only grow in importance as violence against vulnerable groups has increased since the economic crisis and lockdown.

During the COVID-19 related lockdown, detection of abuse cases and referral to Child Protection agencies drastically decreased due to suspension of community-based activities, although families receiving case management reported an increase in violent discipline and distress. There has been a significant increase in the number of cases of Sexual and Gender Based Violence (SGBV), particularly Intimate Partner Violence (IPV) since the economic crisis and COVID-19 lockdown. There has been a 4% increase in IPV violence compared to the same period in 2019, even as reporting of IPV violence decreased by 8% over the same reporting period from 2019. This has highlighted the lack of accurate statistics and appropriate services, such as safe houses. The domestic violence trend reported by the Gender Based Violence (GBV) sector confirms that children are at a higher risk of violence, as they are either witnessing or subjected to violence. The increase of SGBV and IPV revealed the severe lack of services such as health, mental health and emergency shelter to cover the urgent needs of survivors. Particularly the absence of safe shelters to accommodate GBV survivors who are COVID-19 positive or symptomatic.

Recommendations:

- GoL to activate the National Child Labour Task Force and develop clear guidance to address the needs of boys and girls who are engaged in child labour including its worst forms.
- To strengthen the governments technical and HR capacity in terms of monitoring and response bodies (WFCL Unit at the Ministry of Labour, Judges, Municipal Police, ISF, Lawyers) to promote the implementation of child protection laws.
- LCRP actors to prioritize the establishment of a safe identification and referral mechanism between health, education and child protection ensuring that every child is safe, if not referred to the proper protection services.
- LCRP actors to mainstream GBV and Protection against Sexual Exploitation and Abuse (PSEA) across all sectors.
- Donors to ensure vulnerable women and women at risk from all nationalities are included in humanitarian and development programmes of all sectors.
- GBV actors to reinforce GBV preventive activities with men and boys and strengthen the dissemination of GBV information at community level.
- GoL to reinforce systems and policies related to women and girls more broadly.
- Donors should prioritize vulnerable groups in funding and ensure that accurate statistics are collected on the implementation of programs and emerging needs.

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NOTES

ⁱⁱ CAS/ILO 2018- 2019 data revealed an unemployment rate of 11.4 percent, reaching as high as 23.3 percent for youth. iii InfoPro survey

^{1v} Durable Solutions Platform (DSP), Danish Refugee Council, International Rescue Committee, Mercy Corps, Norwegian Refugee Council and Save the Children. May 2020. <u>What Next for Livelihoods Programs in Lebanon? Responding During Economic Crisis and COVID-19</u>. Policy Brief; page 4

^{vi} Durable Solutions Platform (DSP), Danish Refugee Council, International Rescue Committee, Mercy Corps, Norwegian Refugee Council and Save the Children. May 2020. <u>What Next for Livelihoods Programs in Lebanon? Responding During Economic Crisis and COVID-19</u>. Policy Brief; ^{vii} Data from Lebanon Protection Consortium (LPC) Integrated Needs Assessments collected between February 1 and April 30, 2020, show that 45% of Syrian refugees' respondents have no income source, 30% received cash assistance, 10% buy on credit and 8% borrow, while only 5% obtain income through work.

vⁱⁱⁱ According to the World Bank's 2018 estimates, around a third of the Lebanese population live in poverty, up from 27.4% in 2011-2012. Further, given the rapid deterioration of the economy, it is estimated that poverty could rise to 50%. <u>See</u>.

* The Government of Lebanon and its international partners reaffirm their commitment to the goals set out in the "Vision for Stabilization, Growth and Employment", which was presented "Economic Conference for Development through Reforms with the Private sector" (CEDRE) in Paris on 6 April 2018.

At the 2016 London conference, the Government of Lebanon proposed interventions to create job opportunities for both Lebanese and Syrians. * Public debt has continued to increase, reaching more than 155% of GDP in 2019, and is expected to reach 161.8% of GDP in 2020 and 167% of GDP in 2021 according to IMF estimates. Lebanon is the third most indebted country in the world, after Japan and Greece. The already high budget deficit has deteriorated to -13.7% of GDP in 2019. It is expected to rise to -12.7% of GDP in 2020 and -14.1% of GDP in 2021 (IMF). The current account deficit increased to represent -20.6% of GDP in 2019. Inflation slowed from 4.6% in 2018 to 2.9% in 2019. The IMF forecasts rates of 17% in 2020, due to the worsening of the economic crisis, the pressures exerted on the Lebanese currency and the outbreak of the COVID-19 pandemic.

^{xi} Both highlight the essential structural reforms that were emphasized by the international community throughout the "Economic Conference for Development through Reforms with the Private sector" (CEDRE) in Paris on 6 April 2018 and the Brussels II conference of the same year. ^{xii} LCRP 2019 End Year Funding Update, as of December 31, 2019.

xiii ADDRESSING PROTRACTED DISPLACEMENT IN LEBANON, DSP & LCPS report, February 2020, P:23

xiv Livelihoods Sector ActivityInfo reports as per 5 March 2020.

** ADDRESSING PROTRACTED DISPLACEMENT IN LEBANON, DSP & LCPS report, February 2020, P:23

^{xvi} VASYR 2019.

^{xvii} "Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences", May 2020: <u>https://agulhas.co.uk/our-</u> work/independent-monitors-report-on-the-lebanon-commitments-from-the-london-and-brussels-conferences/

x^{wiii} A small proportion, yet unquantified, number of children have attended unrecognized Syrian Learning Centres.

xix UNICEF, UNHCR & UNESCO (2019): Out of School Children Mapping and Profiling 18-19 findings. March 2019. Sector presentation.

^{xx} According to CERD the preliminary data for 2019-2020 says there are 289,698 Lebanese children in public schools. In 2018-2019, according to the Statistics Bulletin for that year, it was 273,634,

^{xxi} <u>https://www.arabnews.com/node/1682376/middle-east</u>

x^{exii} Out of School Children Mapping and Profiling 2018-2019 done by UNICEF, UNHCR & UNESCO, March 2019, found transportation to be the first key barrier for 27% of 3-5 years old and 37% of 6-14 years old; VASyR 2019: the main reason for not being enrolled in school for 6-14 years old is inability to afford transportation (13%).

xiii We World – GVC (2020): Coping with multiple crises. Impact of COVID-19 and Financial hardships on Education in Akkar and Bekaa. April 2020

xxiv a style of education in which students learn via electronic and online media as well as traditional face-to-face teaching.

^{xxv} 'The Obstacle Course: Barriers to Education for Syrian Refugee Children in Lebanon', Norwegian Refugee Council (NRC), March 2020, online publication forthcoming.

^{xvvi} The PMU, supported by the Back to the Future consortium, is currently working on a unified Information Management System for NFE yet it is vital that a the IMS is integrated in the SIMs formal education to ensure proper tracking of the education response.

^{xvvii} Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences (May 2020). <u>https://agulhas.co.uk/our-work/independent-monitors-report-on-the-lebanon-commitments-from-the-london-and-brussels-conferences/</u>. (accessed 02.06.2020). p. 6

¹ For the first time, Lebanon defaults on its debts, Economist, March 2020

v Facing Multiple Crises, Rapid assessment of the impact of COVID-19 on vulnerable workers and small-scale enterprises in Lebanon, ILO, May 2020, P:5&8

xxxiii Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences. p. 8.

xxxiv Save the Children (August 2019). <u>https://www.savethechildren.net/news/save-children-calls-lebanese-authorities-stop-demolition-refugees%E2%80%99-homes</u> (accessed 19.05.2020).

xxxv Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences. p. 8.

xxxxi NRC, IRC, Voices for Syrian Displaced Forum et al (June 2020). Into the unknown: listening to Syria's displaced in the search for durable solutions (working title).

xxxvii Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences. p. 5.

^{xxxviii} Ibid.

xxxix Ibid. p. 6.

^{xl} Ibid.

^{×li} Ibid.

xⁱⁱⁱ SAWA for Development and Aid (2020). The gendered journey of return: the case of Syrian women in Lebanon. <u>https://www.fes-syria.org/publications/</u> (accessed 05.06.2020).

xⁱⁱⁱⁱ NRC, IRC, Voices for Syrian Displaced Forum et al (June 2020). Into the unknown: listening to Syria's displaced in the search for durable solutions (working title). The recommendations contained in this report on returns should be followed.

x^{iliv} Rima R. Habib (2019). Survey on Child Labour in Agriculture in the Bekaa Valley of Lebanon: The Case of Syrian Refugees. Beirut, Lebanon: American University of Beirut Press. p. 18.

The Daily Star (27 August 2019). <u>https://www.dailystar.com.lb/News/Lebanon-News/2019/Aug-27/490475-more-than-2700-syrians-deported-from-lebanon-under-new-rule.ashx</u> (accessed 01.06.2020).

xxviii Arab News (July 2019). https://www.arabnews.com/node/1523926/middle-east (accessed 19.05.2020).

xxix Independent Monitor's Report: Lebanon Commitments from the London and Brussels Conferences. p. 6.

^{xxx} Brussels Monitoring Framework, Commitment 41.

xxxi Further, there has been no resumption of registrations by UNHCR since its suspension in 2015.

^{xxxii} Ibid. p. 7.