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Strategic Mid-term Evaluation

of the

Facility for Refugees in Turkey

2016-2019/2020

Final Report

Volume II: Sector Report on Protection

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Acronyms

3RP	Regional Refugee and Resilience Plan
AFAD	Disaster and Emergency Management Presidency
ASAM	Association for Solidarity with Asylum Seekers and Migrants
ASDEP	Family Social Support Programme (MoFLSS)
CCTE	Conditional cash transfer for education
CM	Case management
CVME	Comprehensive vulnerability monitoring exercise
DG	Directorate-General
DG ECHO	Directorate-General for European Civil Protection and Humanitarian Aid Operations
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
DGMM	Directorate-General for Migration Management (Turkey)
DRC	Danish Refugee Council (to disambiguate, the Danish Red Cross is always written out)
EC	European Commission
EQ	Evaluation question
ESSN	Emergency Social Safety Net
EU	European Union
EUR	Euro
EUTF Madad	European Union Regional Trust Fund in Response to The Syria Crisis ('EUTF Madad Fund')
FGD	Focus group discussion
FTS	Financial tracking service (humanitarian financing database managed by OCHA)
GBV	Gender-based violence
GIZ	*Deutsche Gesellschaft Für Internationale Zusammenarbeit*
GoTR	Government of The Republic of Turkey
HIP	Humanitarian Implementation Plan
HRDF	Human Resource Development Foundation
ILO	International Labour Organization
IMC	International Medical Corps
INGO	International non-governmental organisation
IOM	International Organization for Migration
IP	Implementing partner
IPA	Individual protection assistance (to disambiguate, Instrument for Pre-Accession Assistance is always written in full)
JC	Judgement criterion
KII	Key informant interview
KRG	Key refugee groups (i.e. LGBTI, sex workers and HIV positive refugees)
LFIP	Law on Foreigners and International Protection
LGBTI	Lesbian, gay, bisexual, transgender and intersex
M&E	Monitoring and evaluation
MC	Mercy Corps
MoFLSS	Ministry of Family, Labour and Social Services (Turkey)
MoH	Ministry of Health (Turkey)
MoNE	Ministry of National Education (Turkey)
NGO	Non-governmental organisation (international or national)
NNGO	National non-governmental organisation
OCHA	Office for the Coordination of Humanitarian Affairs (United Nations)
OICR	Outreach, intake, case management and referral
PDFLSS	Provincial Department of Family, Labour and Social Services
PDMM	Provincial Directorate of Migration Management

PICTES	Promoting integration of Syrian children into the Turkish education system (Facility Tranche I direct grant with MoNE)
PSS	Psycho-social support
PTSD	Post-traumatic stress disorder
PWG	Protection Working Group
SASF	Social Assistance and Solidarity Foundation
SAW	Seasonal agricultural worker
SC	Steering Committee
SIHHAT	Improving the Health Status of the Syrian Population under Temporary Protection and Related Services Provided by Turkish Authorities (Direct Grant with MoH)
SNF	Special Needs Fund
SSC	Social Service Centre
SUMAF	Technical Assistance to Support the Monitoring of Actions Financed under the Facility for Refugees in Turkey
TPR	Temporary Protection Regulation
TRCS	Turkish Red Crescent Society
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
UTBA	Union of Turkish Bar Associations
WFP	World Food Programme
WGSS	Women and Girls' Safe Spaces (built into the UNFPA support for Migrant Health Centres)

1. Introduction

1.1. Purpose of the Protection Sector Report

This report forms part of the Strategic Mid-term Evaluation of the Facility for Refugees in Turkey. It presents the evaluation team's in-depth assessment of **refugee protection** in relation to the main evaluation question posed in this focal area (EQ11), namely:

Evaluation question 11: *To what extent has the Facility contributed to the registration and referral of refugees to appropriate protection services?*

This report has been prepared on the basis of findings that were presented at the end of the evaluation's desk phase, in a desk report, which was finalised in February 2020. These findings were further developed and preliminary hypotheses tested through remote data collection methods in lieu of the previously scheduled field mission to Turkey, which was cancelled due to COVID-19 travel restrictions, as discussed further below. Further primary data collection has also taken place to enrich the quality of the evidence by capturing the beneficiary perspective on refugee protection. This report presents the final synthesis of the evidence collected by the evaluation team, in direct response to the evaluation question posed. It constitutes one of four sector-specific studies which are annexed in Volume II of the evaluation's Final Report (Volume I)[1]. The Final Report also provides a summarised version of these findings.

1.2. Methodology

1.2.1. Evaluation design for the refugee protection analysis

The detailed design of the refugee protection sector analysis is provided in the evaluation matrix for the overall evaluation, which can be found in Volume III (Annex 2) of the Main Report. The evaluation matrix details how the evaluation team has structured its assessment of the Facility's effectiveness in registering and referring refugees to appropriate protection services, specifying the judgement criteria, indicators, key data sources and modes of analysis.

The evaluation's assessment of effectiveness focuses on the Facility's 'contribution' to refugee protection – as defined in its intervention logic. This was a challenge, as there is a lack of clear and public data on protection for refugees in Turkey, and the evaluation can only present what can be 'observed' in relation to those outcomes, based on a variety of sources. Further to this, such 'observed' outcomes are influenced by many other factors outside of the European Union's (EU) support: the Facility has been designed to complement and strengthen the government's and the host community's support for refugees, as well as the refugees' own initiatives, not to deliver long-term outcomes through only its own resources. For this reason, the evaluation examines the 'contribution' of the Facility rather than suggesting 'causality' or seeking to 'attribute' results to EU support alone.

Conducting this type of analysis is challenging in such a complex environment, and the evaluation has been designed to generate as much evidence as possible on the basis of both Facility-specific data on its protection interventions and results, *and* national data on the trends in refugee protection and the other factors that lay behind those trends. In addition to examining the whole portfolio of Facility interventions and results in relation to protection, a sample of larger and more recently completed protection interventions were identified and examined further, to understand all aspects of their progress and explore key issues in depth. This and other data, from a wide range of external secondary and primary sources, has been used to gradually build the evidence over the course of the evaluation, as part of an iterative process of 'contribution analysis' as described below.

[1] The official use of the term 'Sector' has evolved throughout the lifespan of the Facility and continues to vary somewhat between stakeholders; for example, the Facility's Updated Strategic Concept Note adopts the term 'Priority Area' instead of 'Sector' for Health, Education, Socio-economic Support and Protection. In line with this evaluation's original Terms of Reference and also for consistency across all evaluation products, the team chose to apply the term 'Sector' throughout all final reports. This choice of wording does not imply a judgement on or a preference for one term over the other.

1.2.2. Contribution analysis

As explained above, isolating the contribution of the Facility in meeting its protection objectives, is methodologically challenging, given the many external factors affecting protection. These include Turkish government decisions that enhanced or limited protection space (i.e. the decision to register refugees, the decision to remove refugees from Istanbul, the decision to withhold health insurance from most non-Syrians after one year), and the refugees' own choices (i.e. moving to other provinces, not registering, sending children to work). There are also other external factors that may have influenced achievements with regard to the availability and accessibility of protection services, including the contributions of other donors. Therefore, as requested in the evaluation Terms of Reference (ToR), the evaluation team has used a theory-based approach, analysing the evidence according to a 'contribution analysis', adapted from the original method developed by John Mayne and tailored to the context of the Facility.

This approach has allowed the evaluators to present a balanced assessment of the EU's contribution, based on all the evidence available, also highlighting key aspects for future learning.

Box 1 Adaptation of contribution analysis methodology for the evaluation

The evaluation team has developed a 'contribution story' on the basis of the following logic with regard to refugee protection:

1) What outcomes did the Facility support seek to achieve in relation to the sector of refugee protection, and what kind of support did it provide to realise these outcomes – otherwise referred to as the 'intervention logic'?

2) What evidence is there that the expected outcomes have been realised?

3) what Have the achievements of the Facility been in relation to these outcomes and, to what extent have other contextual factors played an influential role?

With an absence of data on concrete protection outcomes among refugees, the evaluation has used quantitative and qualitative data to determine whether, at the mid-term of the Facility, there is evidence that the expected outcomes defined in the intervention logic can be observed in practice. The evaluators then analysed in-depth the results achieved by the Facility using both quantitative, output-level data (from Facility results monitoring) and qualitative aspects which were mainly explored through stakeholder interviews and beneficiary surveys, as well as a supplementary 'protection quiz.'. By examining the national context in terms of key policies, legislation, socio-economic and cultural factors, the evaluators were able to make a judgement on what the role and the contribution of the Facility has been, relative to those other factors.

1.2.3. Data collection methodology

During the desk phase, mainly secondary sources were used to develop the preliminary findings based of the evaluation, although stakeholder interviews were held with the European Commission (EC) to inform the evaluation team's general understanding of the Facility in terms of its establishment, structure and key actors involved.

Following the desk phase, the evaluation originally planned to explore the issue of refugee protection during a field mission, with stakeholder interviews and visits to Facility-supported facilities, scheduled for June and July 2020. Perspectives and opinions from beneficiaries themselves would then be collected by means of focus group discussions (FGDs). Unfortunately, the field phase of the evaluation was interrupted by the COVID-19 pandemic and it was not possible for the evaluation team to travel to Turkey to conduct the refugee protection field visits in-person. To compensate for this, alternative methodology was developed to collect primary data on the protection sector, as detailed below.

As preparation for the field phase, interview guides were prepared and translated into Turkish. The questions focused on the judgement criteria (JCs) which were defined for the sectoral analysis of the evaluation, and were designed to test a series of hypotheses for the refugee protection JCs (under EQ11) and address data gaps identified in the desk review.

Following preparation of interview guides, based on the evaluation matrix and gaps remaining after the desk phase, an agreed programme of remote-based data collection, protection sector central-level and province-level interviews were carried out through videoconferencing and phone calls between May and July 2020. The interview schedule was designed to ensure a high inclusion and variety of stakeholders including officials from the Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR), the Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG

ECHO) and the Technical Assistance to Support the Monitoring of Actions Financed Under the Facility for Refugees In Turkey (SUMAF), UN organisations, government partners, international and local non-governmental organisation (NGO)s, academics, and non-implementing NGOs. There is a summary of all stakeholders interviewed in Volume III (Annex 4) of the evaluation's main report.

i. Central-level key informant interviews in the protection sector

A defining characteristic of central-level protection interviews was their depth: most interviews were more than one hour and some lasted two hours. Several interviews that are recorded here and in the team notes as a single interview, were actually multiple interviews in different sessions (for example DG NEAR, DG ECHO, United Nations Refugee Agency (UNHCR) and SUMAF). Furthermore, several EC staff were interviewed a second or third time during the process of validating and revising the second draft of the report.

The protection team started their interviews with Facility staff, SUMAF and UNHCR, the main organisations responsible for funding, setting the direction and reporting on protection. The fieldwork started with interviews with the EC (22 May) and SUMAF (25 May) followed by four separate interviews with UNHCR (1, 3, 11 June). Since UNHCR was one of the main implementing partners in the protection sector, the interviews with UNHCR were longer and detailed with a higher number of interviews and a variety of respondents (see Volume III Annex 4). As detailed in Table 1**,** the team conducted 11 interviews in total with these three organisations, to make sure the view of the EC services is reflected in the evaluation study in a comprehensive manner. The protection team completed 18 implementing partner (IP) interviews with UN organisations and NGOs as planned.

The team arranged interviews with the Directorate-General for Migration Management (DGMM) and the Ministry of Family, Labour and Social Services (MoFLSS), although these did not all proceed as planned. The protection team set up a meeting with DGMM for 3 July 2020. However, the eight participants from DGMM were mainly junior to mid-level migration experts, project assistants and social workers. This interview was useful in terms of understanding the implementation and technical aspects of the project '*Verification of the Syrians under Temporary Protection in Turkey'*. However, the request of the team to carry out an additional interview with the heads of DG International Protection and DG Migration Policy and Projects was not answered by DGMM. For this reason, strategic questions on the management and implementation of this project, and DGMM's broader policy direction, could not be explored in more depth. Nevertheless, DGMM kindly facilitated three interviews with Provincial Directorates of Migration Management (PDMM) in Ankara, Izmir and Adana. Lastly, the protection and socio-economic sector teams arranged a joint interview with MoFLSS. After this initial group interview, the protection team requested a separate interview with MoFLSS to focus more on protection-related questions and particularly on social service centres (SSCs). Unfortunately, MoFLSS did not agree to this interview, and as a result the team could not obtain approval from MoFLSS to arrange province-level interviews with SSCs. This inability to consult in detail with MoFLSS or with the SSCs resulted in a critical gap in the protection team's data collection effort, which was compensated in part by recent evidence gathered by a UNFPA evaluation of their project with MoFLSS.

Table 1 Number of planned, contacted and completed central-level KIIs for the protection sector

	Planned	Contacted	Completed
Interviews with the EU	**12**	**12**	**11**
Interviews with DG ECHO	6	6	6
Interviews with DG NEAR	2	2	2
Interviews with SUMAF	4	4	3
Interviews with IPs (IFIs, UN Organizations, (I)NGOs)	**16**	**16**	**16**
Danish Red Cross	1	1	1
Human Resources Development Foundation	1	1	1
UNICEF	2	2	2
ASAM	1	2	2
IFRC	1	1	1
Care International	1	1	1
Union of Turkish Bar Associations	1	1	1
WFP	1	1	1
UNFPA	1	1	1
Turkish Red Cross	2	2	2
UNHCR	2	2	2
IOM	1	1	1
GIZ	1	1	1
Interviews with Government Institutions	**5**	**5**	**2**
DGMM, Central Interview	1	1	1
DGMM, DG International Protection	1	1	-
DGMM, DG Migration Policy and Projects	1	1	-
Ministry of Family, Labour and Social Services, Central Interview	1	1	1
Ministry of Family, Labour and Social Services, DG Community Services	1	1	-
Non-IP NGOs / Academics / Think-Tanks	**6**	**6**	**6**
Koç University	1	1	1
Turk German University	1	1	1
University of Oxford	1	1	1
Brookings Institute	1	1	1
Refugee Rights Turkey	1	1	1
The Research Centre on Asylum and Migration	1	1	1
Total number of central level interviews	**39**	**39**	**35**

ii. Province-level key informant interviews and visits in the protection sector

The team interviewed DG ECHO field staff in Istanbul and Gaziantep. Given that DGMM, Association for Solidarity with Asylum Seekers and Migrants (ASAM) and the Turkish Red Crescent Society (TRCS) have significant roles in providing protection services to refugees at the local level, the team requested separate interviews with their local offices. DGMM, ASAM and TRCS supported the field team in arranging all province-level interviews. To avoid bias in choosing which local offices to interview, the field team provided certain criteria to guide these institutions on scheduling interviews on behalf of the evaluation team[2]. Accordingly, with the support of ASAM, the team arranged interviews with Yalova Sustainable Living Centre, Karabük Sustainable Living Centre and Kırıkkale Field Office. Additionally, with the support of TRCS, the team arranged interviews with community centres in Ankara, Mardin and Konya. The team also obtained cooperation from DGMM in terms of arranging interviews with PDMMs. With their support, the team carried out key informant interviews (KIIs) with PDMMs in Izmir, Adana and Ankara. The province-level interviews were carried out on the phone in Turkish, taking on average about 45 minutes. The only data gap in terms of accessing and arranging province-level interviews was

[2] These criteria are detailed under the title 'Province level Sampling in Field Phase 2' in the field report.

the set of interviews planned to be carried out with MoFLSS SSCs. The Ministry did not agree to a protection-specific interview, and the team could not get permission to carry out these provincial interviews despite several follow-up emails.

iii. Interviews with other stakeholders in the protection sector

The evaluation team also conducted interviews with academics and non-IP NGOs as they are well known to have vital insights on the implementation and management of the Facility's protection actions. Accordingly, three interviews with academics/researchers from Koç University, Turk German University and the University of Oxford were arranged. Furthermore, KIIs with Brookings Institute, Refugee Rights Turkey and the Research Centre on Asylum and Migration were also carried out, to ensure that the perspectives of think-tanks and non-IP NGOs were captured in this protection sector report.

Table 2 Number of planned and completed province-level interviews in protection sector

		Total planned	Total completed
Listed in the inception report	DG ECHO	-	3
	DGMM	2	3
	UNHCR field offices	2	2
	UNFPA local office staff	2	-
	UNWomen local office staff	2	-
	ASAM	2	3
	Other IP–NGO (TRCS)	2	3
	Total number of province-level interviews and visits	**14**	**14**

iv. Specific challenges and solutions concerning the protection sector interviews

Interviewees spoke candidly, with the assurance from the evaluation team that interviews were confidential and would not be cited. To further protect participants' identity, some of whom provided sensitive information that could only come from a few sources, the key informant data was further anonymised in the final drafting of the report. The evaluation team has, however, selected the tracking data that associates every citation from one or more 'KIIs' to the precise data source.

The most significant challenge that affected the team in terms of leaving an information gap in the data collection was its inability to obtain interviews with MoFLSS. The Ministry sent an email to the field team indicating that they would not meet the team or set up meetings with SSCs, and therefore the team had to complete the fieldwork with this data gap. The team could partly compensate for this by reviewing the report of the UNFPA-commissioned project evaluation, whose authors had been able to gather substantial data, even though they also were not permitted to conduct field interviews.

v. Quantitative data from refugee households

The quantitative data analysis examined a number of data sets collected by the World Food Programme (WFP) and Turkish Red Crescent (TRC) from 2017 to 2020. These are the pre-assistance baseline survey (PAB), post-distribution monitoring surveys (PDMs) and comprehensive vulnerability monitoring exercises (CVMEs). The PAB and PDMs are representative of the Emergency Social Safety Net (ESSN) applicant population and allow us to look at the trends for applicant population over time using cross-sectional data. PAB is a baseline survey of the applicant population pre-assistance and includes beneficiaries and non-beneficiaries of the ESSN, though it does not include any of the ESSN non-applicant population. These surveys are collected by phone interviews and are therefore more concise. CVME3, CVME4 and CVME5 are representative surveys of the whole refugee population in Turkey; hence they give us valuable insights about the overall refugee population. These surveys are collected face to face and provide more detailed information about the refugee population compared to PAB and PDMs. Details of surveys analysed for this evaluation are contained in Annex 2 (Volume III) of the main report.

vi. Qualitative data from refugee households (FGD alternatives)

In order to reach out to beneficiaries during the remote-based field phase, other data sources were used in replacement of collecting primary data through FGDs. These are summarised in Table 3.

Table 3 Data collection methods to obtain beneficiary perspective

DG ECHO evaluation data 2019	• The team member conducting the protection sector review also participated in the evaluation of the EU's humanitarian response to the refugee crisis in Turkey[3] (published 2019), and was able to review that data, in particular interviews with individual refugees, TRCS community centres, and MoFLSS SSCs.
ESSN FGD data 2017	• Re-coding and analysis of FGD raw data (transcripts) collected between November and December 2017 (by Development Analytics) for the mid-term evaluation of the ESSN in Turkey, for which 23 FGDs were held in five provinces: Istanbul, Hatay, Şanliurfa, Izmir and Afyon. The data includes responses from 177 participants (106 women and 71 men, 2/3 of respondents ESSN beneficiaries, 1/3 non-beneficiaries). The FGD data included information on the ESSN as well as other services provided to refugees. • The data provides insights on the daily problems that participants face, their coping mechanisms, ESSN application process challenges, application process problem-solving strategies, their perception of coverage and social integration/cohesion.
Web-scraped social media data	• ***'TRC-SUY' Facebook page***[4] – comments posted on the page between February 2017 and April 2020 were selected based on random sampling. 2,171 comments were collected and analysed in total. The collected data was then analysed to understand basic needs, application barriers, perception of fairness, suggestions to strengthen programme targeting and as well as problem-solving strategies raised by comment owners. • ***UNHCR Information Board Facebook page***[5] – the team randomly selected comments written between December 2018 and May 2020 on the UNHCR page. 399 comments were collected and analysed in total. The data collected from the UNHCR page has provided the team with an important source to understand protection risks as defined by comment owners as well as their concerns about resettlement and their problem-solving strategies.
Online survey and follow-up phone survey	• The survey includes a **demographic questions** section in the introduction and then four main sections (**education, health, socio-economic support and protection**). It received 365 responses, 80 of which were directed to answer the supplementary protection questions. • Those that shared their phone numbers and gave their consent to be contacted were contacted in August 2020 with a follow-up phone call. This phone survey reached a sample of 38 people, 10 of whom responded to questions on protection.

In addition, a protection awareness quiz was conducted in conjunction with the online survey, to collect focused data from 14 questions relating to refugee awareness of their rights and obligations and five demographic questions. Some 137 protection awareness quizzes were completed and analysed.

[3] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU.
[4] https://www.facebook.com/Kizilaykart.SUY/
[5] https://www.facebook.com/unhcrturkeyinfo/

1.2.4. What is protection?

In the humanitarian context, the concept of 'protection' can be summarised as 'all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and the spirit of the relevant bodies of law.'[6] The EU provides a slightly narrower definition in the *EU Consensus on Humanitarian Aid*: 'For the European Commission humanitarian protection is defined as addressing violence, coercion, deliberate deprivation and abuse for persons, groups and communities in the context of humanitarian crises, in compliance with the humanitarian principles of humanity, neutrality, impartiality and independence and within the framework of international law and in particular international human rights law, International Humanitarian Law and Refugee Law.'[7] The 'humanitarian protection' frame is the one applied to the bulk of this report. However, especially when discussing transition and sustainability, the discussion will consider a broader view of protection.

In development contexts, the concept of protection is included within the general scope of human rights and fundamental freedoms, and also within the narrower field of social protection[8]. In the development domain, the EU does not have a strategy or policy for protection comparable to the humanitarian domain, but can refer to a number of general policy statements including the Instrument for Pre-Accession Assistance 2 *Common Implementing Regulations* (236/2014 para. 9), *Lives in Dignity* (2017) and the *New European Consensus on Development* (2017), all of which in some way call for the respect of human rights and for the protection of the most vulnerable in society, as well as for the inclusion of forcibly displaced populations into the economic and social life of their host communities.

A more recent EU publication[9] explicitly references the linkages between humanitarian and social protection objectives (see Figure 1), but as far as the team can ascertain this is not yet formally embedded in EU policy. The note helpfully describes how humanitarian and social protection are related in this way.

Figure 1 Convergence of humanitarian and social protection objectives (Source: EC)

Humanitarian objectives	…map to…	Social protection objectives
• Keep people alive	⟷	• Protect people through life-course
• Alleviate suffering	⟷	• Protect from poverty
• Maintain human dignity	⟷	• Promote human dignity
• Provide basic needs	⟷	• Support livelihoods
• Provide basic social services	⟷	• Support access to social services
• Provide child and family services	⟷	• Support child and family services
• Provide labour opportunities	⟷	• Support access to labour markets

The key to respecting the rights of refugees, under international, and especially Turkish, law is that refugees need to have a legal status in Turkey, and they need to comply with the law. This applies equally to Syrian and non-Syrian refugees[10], although the registration and residence requirements for each group are different[11]. To have legal status, refugees must be correctly registered (registered as refugees, registered as born, registered in the places where they live etc.). Registration is vital because, without it, refugees cannot access services, they do not have legal recourse or the protection of law enforcement officers and – in an extreme scenario – do not legally exist, and as a result can be victims of abuse with impunity. As discussed later in this report, some refugees cannot register for technical

[6] Inter-Agency Standing Committee, 1999 (December). *Protection of Internally Displaced Persons.*
[7] European Commission. 2008. The European consensus on humanitarian aid. Brussels. EU, and confirmed in DG ECHO. 2016. Thematic Policy Document 8: Humanitarian Protection – Improving protection outcomes to reduce risks for people in humanitarian crises. Brussels, EU.
[8] There is no universally accepted definition of social protection. One EU characterisation is 'Social protection systems are designed to provide protection against the risks and needs associated with: unemployment, parental responsibilities, sickness and healthcare, invalidity, loss of a spouse or parent, old age, housing, and social exclusion' (https://ec.europa.eu/social/main.jsp?catId=1063&langId=en). Most definitions consider social inclusion to be a component of social protection.
[9] European Commission (2018) Social Protection across the Humanitarian-Development Nexus A game changer in supporting people through crises.
[10] Turkey's Temporary Protection Regulation establishes that 'Syrian nationals, stateless people and refugees who have arrived in Turkey, whether individually or as part of a mass movement of people, due to events unfolding in Syria, are eligible for temporary protection in Turkey' (Article 1). As such, the term Syrians under Temporary Protection, and the acronym SuTPs, is commonly used by the Government of Turkey, certain EC services, and Facility implementing partners to refer to any Syrian person who has arrived in Turkey after a cut-off date in 2011. This report prefers to simply use the term 'Syrians' or 'Syrian refugees' and does not use the SuTP acronym except when directly quoting external sources.
[11] There are important differences in Turkish law and in service access between asylum-seekers, different classes of International Protection beneficiaries (refugees, conditional refugees, supplementary protection beneficiaries), and beneficiaries of Temporary Protection. Some of these distinctions are explored in the report. Although the Government of Turkey does not recognise all of the above categories as refugees, the term 'refugee' is used in this report very broadly to refer to all the above categories, except when specific distinctions are made.

reasons, and other refugees choose not to register (e.g. because they intend to migrate onwards to Europe). All refugees in Turkey are considered as the population of concern to the EU, including unregistered refugees.

1.2.5. The protection sector in this strategic mid-term review of the Facility

Humanitarian protection is a core purpose and activity of the EU's humanitarian assistance, but protection was not initially described by the Facility as a component of its programming portfolio. Indeed, protection does not appear as a sector in the initial Facility Results Framework[12], or in any of the annual Facility monitoring reports to date. Two possible reasons are stated for this: either the EU did not wish to draw attention to protection activities because some aspects of their work could be seen as confidential or sensitive; and/or the EC was favouring the mainstreaming of protection throughout the programming portfolio rather than singling it out as a distinct sector[13].

Consistent with the initial view that protection is not a distinct Facility sector, the original design of this evaluation did not envisage a separate protection sector analysis and corresponding report. However, the need for this became evident during the initial portfolio review conducted during the inception stage, when it became clear that a full picture of the Facility needed to include the protection portfolio funded under the Facility's humanitarian strand, as well as two projects funded by the European Union Regional Trust Fund in Response to The Syria Crisis (EUTF Madad) that are described by the Facility as 'socio-economic support' in the public list of Facility projects[14], but that closely resemble projects in the humanitarian protection portfolio. Even though the Facility's outward-facing descriptions of the Facility did not characterise these development projects implemented by EUTF Madad as 'protection,' the Facility Steering Committee did[15]. Thus, from the inception report onwards, protection has been built into this evaluation as a separate sector.

However, mindful that most of the Facility Tranche I protection projects had recently been evaluated[16], it was also agreed during the inception phase and confirmed in the desk phase that 'the field phase will not go over the same ground as the DG ECHO evaluation, which provided sufficient evidence on the vast majority of the protection response', and instead will seek to fill gaps in the evidence and analysis. Accordingly, the protection team has focused in depth on two development projects implemented by EUTF Madad that were not previously evaluated (the Danish Red Cross project supporting the TRCS community centres, and the project with ASAM supporting service centres for non-Syrian refugees), and on three humanitarian projects that had not provided their final reports at the time of the humanitarian evaluation. In addition, this report provides an update on trends and issues that have evolved in 2019 and 2020 (since the humanitarian evaluation was completed). Finally, the protection team considered three international non-governmental organisation (INGO) partners: GOAL, Danish Refugee Council (DRC) and CARE, who had also provided more recent reports to the EC since the humanitarian evaluation. The full list of Facility Tranche I funding to protection is provided in Annex 1[17].

1.2.6. Limitations and data gaps

i. Limited official data on registered refugees

DGMM provides limited data on refugees in Turkey on its website[18]. Three significant gaps in DGMM's published data are (1) disaggregation of gender and age data by province for Syrians, (2) data on the number and breakdown (by country of origin or current province of residence) of asylum seekers who have been granted International Protection status, and (3) data on registration regularisations (e.g. inter-provincial transfers, birth and death registrations)[19]. These are fundamental data gaps in relation to the evaluation indicators 11.1.1: Number of refugees whose status with the Government of the Republic of Turkey (GoTR) was regularised through Facility interventions, and 11.1.2: Evidence of status regularisations disaggregated by age, gender and disability. In addition to the basic registration

[12] As reproduced in European Commission. 2020 (May). The Facility for Refugees in Turkey: *The Facility Results Framework Monitoring Report: Output Achievement Progress (As of December 2019)*. Brussels: EU.
[13] KII.
[14] https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/facility_table.pdf
[15] EU Facility for Refugees in Turkey. 2018 (17 May). *12th Steering Committee Meeting*. Brussels: EU.
[16] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU.
[17] For projects covering multiple sectors, the table in Annex 1 estimates the proportion of those projects that was targeted to protection.
[18] https://en.goc.gov.tr/temporary-protection27
[19] KIIs.

data, DGMM also has (but does not make public) profile data on the 2.7m refugees who were verified in 2017–2018, and on whom DGMM collected data along 99 available parameters. The evaluation team requested this data from DGMM but it was not provided.

ii. Supplementary data from partners is limited due to restrictions on NGO data collection and outreach

Some protection-related data has been gathered by UN agencies, NGOs and academic institutions, and, to the best of our knowledge, this has all been reviewed by the evaluation team. However, there are significant regulatory limitations on what research can be conducted in Turkey, including various prohibitions on household outreach and the collection of personal information. As a result, the supplementary survey and research data is quite patchy (both in terms of geography and research topic), and comprehensive time-series data is very rare. The data collected by WFP in the course of the ESSN stands out as being particularly granular and relevant, and has been drawn on heavily by the team. Among the academic studies, the Syria Barometer[20] also provides important time-series data on social cohesion, and is an example of a study that provides good depth – but of only one facet of protection.

iii. Protection-specific datasets from the humanitarian community also have some gaps

The evaluation team considered in some detail the data reported by Regional Refugee and Resilience Plan (3RP) participating agencies to ActivityInfo (the most complete system-wide humanitarian reporting database in Turkey), as well as the data reported by Facility partner agencies to the Commission. Both datasets have their value and are used extensively throughout this report, but unfortunately these datasets do not fully connect with each other: the reporting parameters are slightly different, and the parameters of both reporting systems also changed over time. The team was initially hopeful that it would be possible to calculate with certainty the proportion of all 3RP protection results that could be ascribed to EU-funded protection activities, and thus obtain one objective measure of contribution. However, the mismatch of the databases, and the inconsistent compliance of 3RP participating agencies in specifying the donor agency for their different activities, prevented such a tidy analysis.

iv. Project-level administrative data fully met EU standards, but did not tell the full protection story

All the humanitarian and development projects met their reporting requirements and their data is a primary source for this evaluation – but the administrative data only measured a few key project indicators that did not fully align with the indicators of the evaluation judgement criteria. Furthermore, the protection indicators used for humanitarian assistance and for protection activities financed by EUTF Madad were not exactly the same, just as the indicators used for humanitarian assistance were not constant throughout the reporting period. As a result, some of the portfolio-level conclusions rely on approximations not exact comparisons. Finally, the evaluation team's assessment is that some partner organisations had different interpretations of the Commission's humanitarian indicators, for example some partners counted unique beneficiaries while others counted transactions (which could be multiple with the same beneficiary), and some organisations reported the provision of information as a 'service' – while others used a narrower definition of 'service.'

v. There is a data gap regarding SSCs, because MoFLSS did not agree to be interviewed by the evaluation team on this subject

In order to avoid overburdening partners who had already been evaluated in the course of the preceding humanitarian evaluation, the protection sector review planned to cover in depth only those humanitarian projects that had been recently completed (TRCS, UNHCR and UNFPA), and the protection projects (ASAM and TRCS)[21] funded from development sources. Unfortunately, the key project with UNFPA, supporting the MoFLSS SSCs, could not be fully assessed because MoFLSS did not agree to be interviewed by the protection evaluation team – which also meant that the team could not contact and interview any Provincial Directorate of Family, Labour and Social Services (PDFLSS)

[20] Migration and Integration Research Centre. (2020). *Syria Barometer 2019*, Ankara.
[21] The contractual partner for this EUTF Madad action is the Danish Red Cross, which has subsidiary arrangements with the Red Cross societies across the region and in this case, with the Turkish Red Crescent. However, through this report, it is the country-level operating partner TRCS that is referred to most frequently, rather than the formal contract-holder.

offices or SSC staff. The end result of this is that the evaluation team only has information from UNFPA and from the Facility on the performance and effectiveness of the SSCs.

1.3. Structure of the report

This report has been structured according to the EQs and judgement criteria (JCs) of the evaluation matrix. Section 2 describes the rationale for the evaluation and the theory of change (also referred to as the intervention logic) for the Facility's investments in the protection sector. Section 3 presents the evaluation's main findings in response to the EQ on protection. In Section 4, we present a brief analysis of Facility support in light of the COVID-19 outbreak; and in Section 5 we present conclusions for the protection sector.

2. Rationale

Evaluation question 11: *To what extent has the Facility contributed to the registration and referral of refugees to appropriate protection services?*

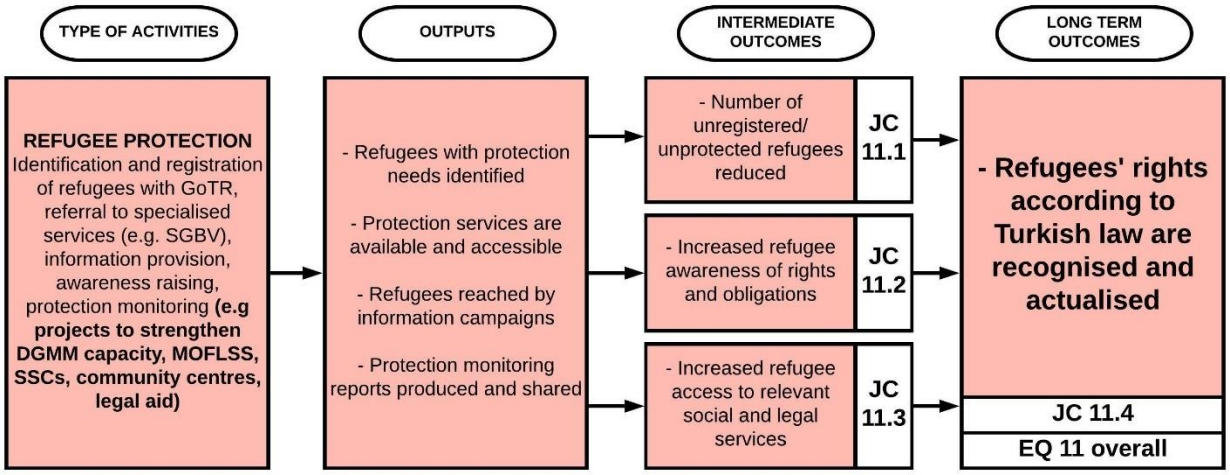
This report evaluates the overall effectiveness of the Facility's support in the protection sector. It explores EQ11 through an in-depth examination of the extent to which Facility interventions have contributed to the intermediate outcomes that were defined in the Facility theory of change that was built by the evaluation team during the inception phase.

These protection intermediate outcomes are:

- Number of unregistered and/unprotected refugees reduced
- Increased refugee awareness of rights and obligations
- Increased refugee access to relevant social and legal services

As shown in the diagram below (Figure 2), these intermediate outcomes are considered to be pre-requisites to the achievement of the long-term outcome that 'refugees' rights according to Turkish law are recognised and actualised'. As a mid-term evaluation, it is appropriate to examine progress towards achieving the intermediate outcomes, and reflect on learning to improve the possibility of achieving the Facility's long-term protection goals.

Figure 2 Reconstructed intervention logic for Facility support to protection-related outcomes



For this evaluation, these intermediate outcomes have been developed into a series of judgement criteria (JCs) around which evidence has been gathered in order (i) to identify the extent to which the intermediate outcomes have been achieved; and (ii) to assess the extent to which the Facility has contributed to the achievement of these outcomes.

The JCs for the evaluation's overall response to EQ11 are:

- Judgement criterion 11.1: The Facility has contributed to the registration of refugees
- Judgement criterion 11.2: The Facility has contributed to raising refugees' awareness of their rights and obligations
- Judgement criterion 11.3: The Facility has strengthened refugee access to specialised protection services

In the early stage of the evaluation, a further JC was developed, to look at the sustainability of protection interventions:

- Judgement criterion 11.4: The Facility has put in place provisions for the sustainability of protection interventions

In the following analysis, the JCs are broken down into components. For example, JC 11.2 unpacks 'awareness' into 'participation in awareness sessions' and 'change in awareness'. These components

have then been translated into indicators which have guided the collection of data, and which provide the backbone of the evidence base. The analysis of JC 11.2 further discusses several aspects of awareness such as refugees' preferred methods for obtaining information about their rights and obligations.

Likewise, JC 11.3 unpacks 'access to services' into 'referrals to services' and 'services received', translates them into corresponding indicators, and then further analyses the full spectrum of protection services and service providers, considering which types of protection needs were met better than others, and which models of protection service provision were more effective.

We present the data and evidence (findings) for our assessment against each of these judgement criteria by applying the following logic: (i) the extent to which the 'expected' intermediate outcomes have been achieved, and can be observed; (ii) a description of the Facility interventions that were designed to achieve the expected outcomes in the intervention logic; (iii) a contextualised analysis of the achievements of the Facility vis-à-vis other internal and external factors; and (iv) a qualitative judgement, based on the evidence available, of the extent to which the Facility has contributed to the observed outcomes. Throughout the analysis, the report identifies where unintended consequences, both positive and negative, have occurred. Based on this systematic assessment, this report then presents its main conclusions, which constitute a synthesised interpretation of the evidence, in response to the main evaluation question.

3. Key findings

3.1. **Judgement criterion 11.1:** The Facility has contributed to the registration of refugees

3.1.1. 'Registration' as an outcome

To enjoy their rights and access to services in Turkey, to be protected, refugees must be registered. Registration is a requirement for persons to be covered by the Law on Foreigners and International Protection (Law 6458) (LFIP)[22], and conversely, any non-citizen in Turkey without a valid visa (Article 11), residence permit (Article 19) or refugee registration (Article 69) can be detained and removed from Turkey.

The evaluation team considers that the broad concept of 'registration' covers all aspects of refugee identity and status documentation in Turkey, including pre-registration, registration (under International Protection or Temporary Protection categories), refugee status determination, verification of registration, and change of registration information (e.g. change of residence or family composition). In addition, the evaluation team's analysis examines – albeit in less depth – several aspects of refugee de-registration, such as de-registration because of not showing for verification, departure from Turkey (e.g. through temporary or permanent return to countries of origin, resettlement, or irregular departure to Europe), and conversion of status to citizenship. Finally, the evaluation team examines the situation of persons who are unregistered in Turkey, some of whom could be asylum seekers, and others of whom could be irregular migrants. From a protection point of view, the Facility is concerned with all of these categories of refugee except those who have been afforded Turkish citizenship, and irregular migrants who are not seeking protection in Turkey as refugees.

i. Measurable data of registration outcomes achieved

Adequate data on most of the above-mentioned aspects of registration is available, although there are significant gaps as outlined in 1.2 above. There is partial data on the population of refugees who are registered but outside their province of registration (as a result of which their access to services is severely limited). There is some qualitative but very limited quantitative data on unregistered refugees.

There are only two registration targets that have been used by the EU, and both of these targets were clearly met. The first is the target drafted by the Commission in its strategic objective for protection in Turkey: 'ECHO successfully identifies an initial one million vulnerable refugees, their specific needs and links them with the right information to regularise their status to access social services and to improve their living conditions and well-being.'[23] The second was an output target in the project with UNHCR supporting the verification exercise conducted by DGMM (2.7m refugees verified)[24]. By these two simple measures, the EU's registration targets in Turkey were met, and in the case of persons identified and protected, greatly surpassed, since Turkey reports at least 3.6m Syrian refugees as registered in Turkey, to which could be added several hundred thousand non-Syrians.

ii. Other evidence that registration outcomes were achieved

There is qualitative evidence that nearly all Syrians in Turkey *who want to register* are registered, and that those few Syrians who are not registered have difficult barriers to registration (as discussed below). The same cannot be said for non-Syrians, who encounter increasing difficulties with registration since this was taken over by DGMM in September 2018, and in particular Afghans experience systemic barriers to registration and protection in Turkey. However, being registered is not a sufficient condition for protection in Turkey. It is a necessary condition, but to be fully protected and to receive full access to rights and services, refugees must also be resident in their province of registration. The evidence on the number of refugees outside their province of registration is mixed, and it appears that the number of out-of-province refugees decreased significantly in late 2019, as a result of a policy decision of the municipal authorities of Istanbul. These aspects are all discussed in further detail in the sections below.

[22] https://www.unhcr.org/tr/wp-content/uploads/sites/14/2017/04/LoFIP_ENG_DGMM_revised-2017.pdf
[23] ECHO. (2017). Turkey Management Framework 2016–2018.
[24] ECHO/TUR/BUD/2016/91006 and ECHO/TUR/BUD/2017/91005 *Final Reports.*

Table 4 Summary of intermediate outcome: registration of refugees

Expected outcome	The Facility has contributed to the registration of refugees
Observed outcome	• According to government statistics: **3,609,003 Syrian refugees are registered in Turkey**[25]. The EU's registration targets in Turkey have been met, and if persons identified and protected, greatly surpassed, as Turkey reports at least 3.6m Syrian refugees as registered in Turkey, to which could be added several hundred thousand non-Syrians. DGMM does not provide statistics for non-Syrians (persons under International Protection): the last official number provided by UNHCR at the moment of handover of non-Syrian registration to DGMM was 368,000. The most recent estimated number of registered non-Syrians is **328,000** (in UNHCR's 2020 appeal document).
Facility results contributing to the outcome	• **Indicator 11.1.1:** Number of refugees whose status with the GoTR was regularised through Facility interventions UNHCR's reporting (confirmed by DGMM) states that **2,756,612** refugees had their registration details verified. Verification was a process that involved confirming refugee presence in country, updating details of family composition, and in some cases changing the refugee's province of residence: all of which are aspects of 'regularisation.'[26] • **Indicator 11.1.2**: Evidence of status regularisations disaggregated by age, gender and disability DGMM has not made public disaggregated data on the verified refugee population. The evaluation team asked for this data directly from DGMM, but it was not provided.

iii. Hypothesis on the Facility's contribution to the observed outcomes

Successful registration and verification require several factors to come together. The most important is the work of DGMM and the PDMMs to conduct registration and verification. But other factors more on the demand side include providing information on registration, active support for registration, the creation of incentives to register, and the removal of obstacles and disincentives to registration.

All Facility protection projects worked to some extent on these factors and contributed to both the demand and supply sides of registration, although more successfully for Syrians than for non-Syrians. Two projects in particular, major projects with UNHCR to support DGMM registration (2016) and then verification (2017), were essential for the status regularisation of at least 2.7m refugees in Turkey.

iv. Data sources on registration

Registration, which includes all questions regarding the identity and numbers of refugees (e.g. where they are, who they are, what are the factors facilitating and obstructing registration) is one of the largest domains of data in this evaluation.

The primary quantitative datasets that the team has captured and analysed are the DGMM website data on registrations, asylum applications and apprehensions of irregular migrants; administrative data in project reports (in particular the UNHCR projects supporting registration activities of DGMM); UNHCR data on refugees in Turkey as well as on land and sea arrivals in Greece, voluntary repatriation and resettlement; and International Organization for Migration (IOM) data on the distribution of migrants across Turkey (and the difference between where refugees are registered and where they live). Other quantitative datasets that have been used to analyse registration include Office for the Coordination of Humanitarian Affairs (OCHA) Financial Tracking Service for aggregate data on donor spending (as one

[25] This number is updated in real time by DGMM: this figure is since 14 August 2020. Some academics and other observers claim that this is an overstated number, but they all agree that the vast majority of Syrian refugees in Turkey are registered.
[26] The number of verified refuges is lower than the total refugee population because the exercise was limited to refugees who were initially registered in Turkey before 31 December 2016. The target number for verification was 2.7m.

metric of Facility contribution); World Food Programme (WFP) survey data (particularly Comprehensive Vulnerability Monitoring Exercise (CVME)3, CVME4 and CVME5 for data on the proportions and profile of registered and unregistered refugees); implementing partner reports (e.g. the TRCS reports on assistance to persons relocated from Istanbul in mid-2019); and academic studies (many based on surveys such as Syria Barometer).

While the data on registrations and verifications conducted by DGMM and (until late 2018) UNHCR can be regarded as of very good quality, the data on the total number of refugees currently in Turkey and on their current distribution is much less reliable, especially for non-Syrians. Indeed, how many refugees there are, where they are and who they are is of considerable academic and media speculation. The data on unregistered refugees is the least reliable of all, although the evaluation team has attempted to narrow this gap using multiple sources of evidence.

Qualitative data comes from 45 protection-focused key informant interviews plus another 15 interviews where the protection team participated; approximately 40 project documents (from 25 humanitarian protection projects and two development projects); and approximately 50 academic or published agency reports and media articles relating to all aspects of legal status and registration of refugees in Turkey. The qualitative data shows a strong consensus that until mid-2019 there was a significant proportion of the registered refugee population that was residing (working) outside its provinces of registration. However, the qualitative sources do not agree on the total number of refugees in Turkey, in part because of the wide variation in estimates of undocumented arrivals and departures, but also because there is a substantial number of irregular migrants in Turkey, some of whom can be seen as unregistered refugees or as potential asylum seekers.

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3.1.2. Description of Facility interventions aimed at supporting the registration outcome

According to the project list provided to the evaluation team (Annex 1), there were 29 humanitarian projects under Facility Tranche I with protection as a primary or secondary objective (after education, health or basic needs). The value of the projects that the EC considers to be ‘protection’ is EUR 150 million. To this should be added the two ‘protection projects’ implemented by EUTF Madad, for a further EUR 42 million, leaving a sum total of EUR 192 million of ‘EU protection funding’ in Facility Tranche I.

i. Registration

The two Facility Tranche I projects that focused specifically upon registration were both with UNHCR: ECHO/TUR/BUD/2016/91006 (EUR 43 million) and ECHO/TUR/BUD/2017/91005 (EUR 33 million). The core of both projects was support to DGMM (interpreters, supplementary staff, equipment, training, technical assistance) for registration of Syrians and non-Syrians, and for the verification of Syrians. Syrian refugees have always and only been registered by DGMM, but until 10 September 2018, non-Syrian refugees were pre-registered by ASAM on UNHCR’s behalf before being referred to DGMM for registration. A total of 227,364 non-Syrians were pre-registered through these two projects between 1 August 2016 and 10 September 2018[27], after which registration of non-Syrians was carried out by DGMM alone, with ongoing technical support from UNHCR.

[27] Project final reports for ECHO/TUR/BUD/2016/91006 and ECHO/TUR/BUD/2017/91005.

ii. Referrals to registration from community centres

In the provinces housing the majority of Syrian refugees, a substantial network of NGO community centres[28] was set up, and a similar albeit leaner network was set up in the main non-Syrian provinces. These community centres provided a range of services to refugees (both registered and unregistered), and one of their universal core functions was to assist refugees to register or update their registration. There is a broader discussion in Section 3.3 on service referrals – but in this section we highlight that referral to PDMM was a critical and special type of referral, because it unlocked protection rights and access to other services. Typically, community centres would provide basic information on the registration process, and individual counselling in cases where registration is difficult (perhaps due to an unusual family composition, or in a province where registration is restricted). Community centres often also provided material support with navigating the bureaucracy; for example, transport costs and interpreter support.

Some community centres (notably TRCS) had particularly strong relations with PDMM and could actively refer cases to PDMM to help expedite the registration process or overcome obstacles. TRCS reported to the evaluation team that in the period mid-2019 to mid-2020, which was already at a late/mature stage of the response, referrals to DGMM were still the single largest category of external referrals from TRCS community centres[29].

The following humanitarian partners operated one or more community centres, often in conjunction with a national NGO: UNHCR (which had many national NGO partners some providing specialised services, for example with detainees or lesbian, gay, bisexual, transgender and intersex (LGBTI) refugees), TRCS, Welthungerhilfe, DRC, CARE, World Vision, Mercy Corps, Diakonie and Concern Worldwide[30]. In addition, EUTF Madad supported TRCS and the extension of ASAM to previously unserved non-Syrian provinces. Altogether, some 18 projects for EUR 157 million provided some measure of support to community centres.

iii. Specialised service providers supporting registration referrals

In addition, a number of NGO partners, such as the Union of Turkish Bar Associations (UTBA, through UNHCR), KAOS (through UNHCR and also through UNFPA), GOAL, Save the Children and Handicap International (now renamed Humanity and Inclusion) provided specialised support to particularly vulnerable refugees or isolated communities that included support for referral to registration or, in the case of UTBA, legal assistance to refugees experiencing difficulty with registration or re-registration after departure from Turkey.

iv. Referrals to registration from other Facility service providers

Refugees need to be registered to access government services including cash support programmes such as ESSN. As a result, all the major projects providing basic needs, education and health services also had mechanisms where applicants without the required registration were referred to PDMM for registration. Initially, the following partners and projects spent considerable effort in referring applicants to PDMM, although the registration referral aspect of their work diminished over time as the families were successfully registered and/or their registration bottlenecks were resolved: WFP (ESSN project, in conjunction with TRCS and MoFLSS)[31], United Nations Children's Fund (UNICEF) (Conditional Cash Transfer for Education (CCTE) project, in conjunction with Ministry of National Education ((MoNE) and TRCS), UNFPA (SSC project with MoFLSS). In addition, a number of organisations managed websites, social media pages and refugee information hotlines that assisted refugees in understanding the registration process, and guiding them to access PDMM.

[28] This report uses the term 'community centre' broadly to encompass institutions that were known variously as community centres, refugee service centres, multi-sector service centres, and field offices.
[29] Email communication with TRCS staff.
[30] Within the community centres, the Commission's DG ECHO typically funded their protection activities while other donors funded the provision of other social services, although the Commission's DG ECHO fully funded one TRCS community centre in Istanbul under HIP 2016.
[31] Referrals to DGMM were the second largest category of protection referrals from ESSN (18%), following referrals to health services (34%). The proportion of referrals to DGMM was constant from 2018–2019: Maunder, Nick et al. (2020). *ESSN Mid-Term Review*. Ankara. WFP.

v. Protection monitoring

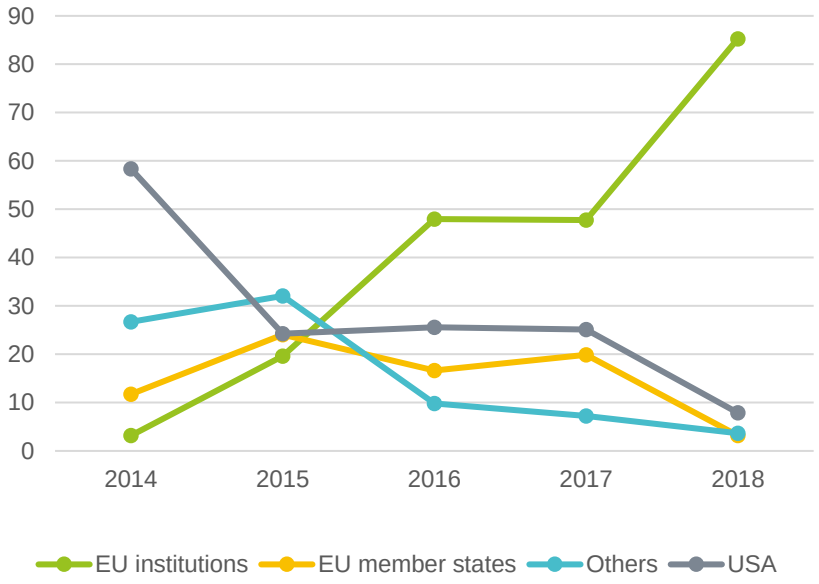
In order to continuously assess the shifting topography of protection needs and ensure that there are no serious geographic, population or service gaps, the Facility supported UNHCR and DRC to conduct protection monitoring. For UNHCR, this consisted of a series of participatory assessments (a regular UNHCR tool that is usually undertaken annually) that explored different protection topics. For DRC this consisted of a series of separate analytical studies, sometimes based upon new topic-specific research, and some conducted in conjunction with International Medical Corps (IMC). In addition, the sector working groups at national and provincial levels sometimes undertook protection-related studies (for example, the 2017 cash gap analysis undertaken by several NGOs in order to assess the effectiveness of ESSN targeting)[32], and some NGOs conducted their own surveys and analysis to support their programming. Because registration is so central to protection in Turkey, many of these surveys and studies probed the relationship between registration and access to service, and some went further to try understand obstacles to registration and the particular problems of unregistered refugees. Not all of these protection monitoring reports are made public, but most of the studies conducted by humanitarian partners have been provided to the Facility, which has been able to use them to direct activities towards regions and populations that were underserved.

vi. The Facility's proportion of overall funding to registration

The available datasets are not sufficiently robust to allow the evaluation team to reliably calculate the proportion of protection funding in the Facility Tranche I period that was provided by the EU. However, the team has two datasets that provide strong evidence that the EU was, by the end of 2018, the dominant international humanitarian donor to refugee protection in Turkey.

Figure 3 shows that in 2016 and 2017, the EU represented about half of the international humanitarian funding to Turkey (both on-appeal and off-appeal), and that this increased to 85% in 2018. Since the GoTR is not financing any of the NGO protection activities (e.g. the community centres), and the Facility is financing most of the community centre actors, it can be inferred that a substantial proportion of the community centre activity in Turkey (somewhere between 50% and 75%) was financed by the Facility in the 2016–2018 period.

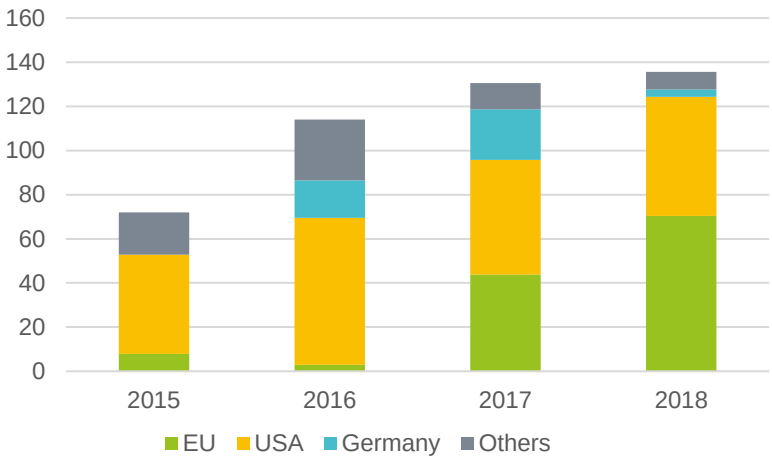
Figure 3 Percentage shares of total international humanitarian funding to Turkey (source data Financial Tracking Service – FTS)



The picture is somewhat more complex for support for registration, because the bulk of the costs of registration are borne by the Government of Turkey's financing of the core costs of DGMM, and the DGMM budget is not made public. However, there is good data from the Financial Tracking Service (FTS) and from UNHCR itself on donor financing to UNHCR, which is the only international agency supporting DGMM for its refugee registration work.

[32] Cash Based Interventions Working Group. (2017). Profiling of caseload in need of cash-based interventions, Ankara.

Figure 4 UNHCR funding sources 2015–2018 (USD million)



Overall data on funding to UNHCR shows (Figure 4) that the USA was until 2018 the largest donor to UNHCR Turkey, and that the EU pulled ahead of the USA into first place in 2018. This, combined with the information provided by UNHCR in its project reports that the EU was the major donor to its registration and verification programmes, contributing 87% of UNHCR's HIP 2016 project and 71% of UNHCR's HIP 2017 project, allows the team to infer that somewhere between 50% and 75% of the external support to DGMM's registration and verification work was provided by the EU under Facility Tranche I.

3.1.3. Contextual analysis of Facility interventions

This section contains a contextualised analysis of how the support provided through the Facility has sought to reduce the number of unregistered and unprotected refugees. This begins with an examination of the activities of the Facility and the strengths of its approach, and what external factors favoured the achievement of registration outcomes. Then the analysis considers opposing contextual factors that have made registration activities more difficult, including key constraints encountered by the Facility partners and partner efforts to overcome those constraints. Finally, the contextual analysis reflects on those external factors that have influenced the numbers of registered and unregistered refugees in Turkey, independently of the EU's efforts.

i. Facility support for registration and additional contributing factors

a. Government commitment (especially for Syrians)

The primary facilitating factor for refugee registration in Turkey is the political will, backed up by government resource allocations, to register and protect refugees in Turkey. As discussed below, this political will is stronger for Syrians than for other refugee groups, and the protection regime has its shortcomings. Nonetheless the level of commitment to protect and to provide services to refugees in Turkey is among the highest in the world[33]. Without this foundational support, the contributions of all donors including the EU would have been considerably less effective.

In 2013 there was a fundamental revision of Turkish refugee legislation, in part as a policy choice to move towards the conditions for EU accession, but also to cope with the rapidly growing number of Syrian refugees. The Law on Foreigners and International Protection (2013) set out a bold and generous protection regime, notably creating a distinction between International Protection and Temporary Protection[34], providing registered refugees in both categories with free access to most government services, and creating DGMM. From 2014 onwards, DGMM capacity has been built up as rapidly as possible, barely keeping up with the increase in refugee numbers. Some key landmarks in DGMM's evolution were the decision to create a centralised registry of Syrian refugees (2015), the creation and staffing of a network of provincial migration management offices, the decision (2016) to validate the earlier ad hoc registrations of Syrians and update them in a computerised database, the assumption of responsibility for registration of non-Syrian refugees and also refugee status determination (2018), and the assumption of responsibility for the Temporary Accommodation Centres

[33] There is no doubt that Turkey hosts the largest number of refugees in the world, by far. Both Jordan and Lebanon host about twice as many refugees per capita than Turkey, but Turkey also provides more access to government services than Jordan or Lebanon.
[34] There are important distinctions between these two refugee categories. In essence: Temporary Protection status is provided to Syrian refugees as a group (there is no individual refugee status determination) and provides them with access to a wide range of services as well as limited access to formal employment. In theory, Syrian refugees can register to live anywhere in Turkey, and can access services only in their province of registration. Non-Syrians are provided with International Protection status after a more onerous registration and status determination process, they can access the same services as Syrians except that health insurance now lasts only for one year, they do not generally have access to the formal labour market, and they should live in designated 'satellite cities,' which for the most part are not major urban centres or in the regions heavily populated by Syrian refugees.

(refugee camps, until 2019 under the authority of the Disaster and Emergency Management Presidency (AFAD)).

UNHCR has been a long-term partner with the Government of Turkey, supporting refugee registration and legislative development since long before the Syrian crisis, supporting DGMM since its creation, and is the only international organisation with a relationship that allows the provision of technical assistance to the government in refugee matters[35]. As such, it is inevitable that any technical support for the administrative process of refugee registration and status determination in Turkey will need to work through UNHCR[36]. In 2012 the EU provided some support to UNHCR's Syria-wide activities that included Turkey, but only in 2016 did the EU enter into its first Turkey-specific project agreement with UNHCR.

b. Facility support through UNHCR for registration and verification

The 2016 HIP project with UNHCR was EUR 43 million – at that time the second-largest EU humanitarian project ever[37] – demonstrating that the Commission went 'all in' with its support for refugee registration in Turkey. The project had four components: (i) support for registration of non-Syrians (target exceeded); (ii) support for refugee status determination (target exceeded); (iii) support for verification of Syrians (target not met, but activity continued in a subsequent project); and (iv) support for a basket of activities that included protection monitoring and protection assistance (all targets exceeded).

The shortcomings of the verification component (which resulted in an extension of the project from 6 to 24 months, and a top-up of EUR 8.2 million, and still only 75% of target achieved) were ascribed to the difficult operating context of Turkey, the lack of readiness of DGMM to undertake such a huge exercise so soon after its creation, and a range of technical challenges including problems finding office space in target provinces, turnover and recruitment of staff, finding sufficient interpreters, connectivity, a major increase in the complexity of the verification data collection form, and software development. It is also important to note that there was an attempted coup in the middle of this project, as a result of which many senior government officials were shuffled with consequent loss of established relationships and continuity, and at least one of UNHCR's partners was closed by government decree. This difficult political context was also a factor leading DGMM to be cautious about advertising the verification campaign too openly, and discouraging UNHCR from proceeding with some of the ambitious publicity that was initially planned[38]. The EC accepted the reasons for the delay and underachievement of the output targets, and generally concluded that the project had been a success given the constraints.

Any shortcomings with UNHCR's project funded by HIP 2016 were overcome with the successor project funded by HIP 2017, which built on the earlier project, and supported seven activities: (i) registration of Syrians and non-Syrians (target exceeded); (ii) protection monitoring (target met); (iii) communication with communities – online help and social media platforms (targets exceeded); (iv) protection assistance (targets exceeded); (v) legal aid through UTBA (targets exceeded but only after an extension of time); (vi) inter-agency coordination (target met); and (vii) verification (verification target met). This project also was considered an overall success, and encountered fewer constraints. UNHCR singled out this project's completion of the verification process as having been instrumental for the regularisation of a huge number of incomplete records and inter-provincial transfers, but was unable to give an exact number[39]. However, two areas of relative underperformance were the UTBA component (reportedly rectified in the successor UNHCR project under HIP 2019), and the component of non-Syrian refugee registration, which was abrogated for reasons beyond UNHCR's control when DGMM took over this activity as of 10 September 2018.

The EU was by far the majority donor to these two critical projects supporting registration and verification from 2016 through to 2019 (87% and 71% of funding respectively), and is regarded by UNHCR senior management as having been instrumental in ensuring the quality and continuity of registration throughout this period.

The handover of non-Syrian registration and refugee status determination to DGMM was regarded by interviewees as having advantages and disadvantages. On the advantages side, it is a sign of maturity

[35] Other organisations, including IOM, work with DGMM with regard to DGMM's mandates for irregular migration and human trafficking.
[36] However, the financing of DGMM's operating costs could be provided directly by donors to DGMM through a direct grant, in which case a technical support component involving UNHCR would be highly advisable.
[37] The earlier and larger project was as an all-of-Syria response in 2013.
[38] UNHCR project reports, and UNHCR *Final Report Verification Exercise.*
[39] KII.

and sustainability that a host government takes over the process and the expenses of registering refugees and conducting refugee status determinations[40]. However, the handover might not have been well planned[41], and has had some negative consequences that are discussed below.

c. Incentives of ESSN and CCTE

Since the onset, registration has been required for access to ESSN. In its strategic planning, the Commission clearly saw a mutually reinforcing relationship between ESSN and registration, and the incentive that ESSN provided for registration was a designed feature of ESSN built into the humanitarian programme's theory of change: 'The Kizilay Kart programme will serve as an incentive for registration and contact with protection outreach, intake and referral services.'[42] The effectiveness of ESSN as a driver for registration was confirmed by several interviews with community centre managers and international agency staff[43]. The same 'incentive logic' would apply, albeit to a lesser extent, to CCTE.

d. Protection risks created by the ESSN targeting methodology

While the overall benefits of linking registration to ESSN are not in dispute, there were some negative protection consequences of the ESSN targeting methodology. ESSN targeting was designed in such a way that a simple demographic test (based upon registration data) would determine eligibility. This method enabled the enrolment of a very large number of refugees across the country, very quickly, with the minimum of subjective assessment (e.g. a means test or a household vulnerability assessment), and it was highly successful in being universal, quick and relatively fair. However, because everything depended upon the family structure (number and configuration of adults, children, elderly and disabled persons), some refugees had the incentive to misrepresent their family structure in order to qualify. Evidence of this is mainly anecdotal and reported in interviews[44], but generally confirmed by the evaluation team's review of the web-scraped data from the 'TRC-SUY' Facebook page, where the complaints clustered around questions of family size and the age-18 cut-off date.

To illustrate this problem, consider three scenarios reported to the evaluation team several times:

1. Every time a child reaches 18 this changes the adult/child (dependency) ratio and can make an eligible family ineligible. As a result, some families claim that the child has left the family (for example moved to another province) so that their demographic ratio is still eligible. Consider the example of a mother and two children: the moment one child turns 18 this family now has two adults and one child and becomes ineligible. However, if the child gets married before the age of 18, then the family can be eligible again (as a single mother with one child) – so there is an immediate incentive to marry girls before they reach 18. Alternatively, the child can be sent to live on her own or with another family: because as two single women the refugees are eligible – but not if they are two adult women in the same household. By the same logic, there were cases of children from large households being registered to other families in order to help them qualify. In this way, an immediate problem is solved (access to ESSN) but a new longer-term protection problem is created, as a child is now registered with a false identity.
2. In a second scenario: if a man marries a woman at the age of 18 they do not qualify for ESSN, but if the man marries her at 16 then they do qualify for ESSN because from the demographic perspective this is assumed to be a single father and his daughter, and the real relationship is not always checked. Social Assistance and Solidarity Foundations (SASF) were reported to be treating these cases differently, some SASFs identify them as child marriage, but others just consider the ages and the registration data to determine eligibility[45].

[40] KII.
[41] The government announced its intention to take over registration of non-Syrians in April 2018: https://www.unhcr.org/blogs/moving-on-authorities-in-Turkey-take-over-refugee-registration/
[42] DG ECHO. (2017) ECHO Turkey Management Framework 2016–2018. Ankara. EU.
[43] It was also confirmed by the WFP evaluation: 'Complementary protection programmes funded by DG ECHO and other donors…are supporting a range of refugee needs. This included refugee registration to support ESSN applications and provided 'handholding' support to ESSN applicants, reducing barriers to enrolment for some of the most vulnerable. Refugee registration – which is encouraged by the ESSN incentive – also means that refugees are no longer illegal and can access legal protection.' Maunder, Nick et al. (2018). Evaluation of the DG ECHO funded Emergency Social Safety Net (ESSN) in Turkey. Ankara. WFP.
[44] KIIs., European Commission. (2019). *Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey*. Brussels: EU. This was also confirmed by the evaluation team conducting the Mid-Term Review of ESSN in 2019 (personal communication).
[45] KII.

3. In a third scenario, a family might declare that the father/husband is dead or missing or returned to Syria, in order to qualify as a female-headed household. In this case, again, an immediate problem of ESSN access is solved, but if the husband is in Turkey then he is no longer registered and can no longer get access to any services[46].

The potential for these distorting effects of the demographic eligibility criteria were known by staff from all agencies working on the ESSN[47], but as far as the evaluation team can ascertain they were not openly reported, for example they were not identified in WFP's 2019 report on protection and the ESSN[48]. Even if it is too late to consider these factors in the design of the 2019 ESSN project with IFRC/TRCS, they could still be considered for future rounds of ESSN or similar support, in Turkey and elsewhere[49]. They could also inform the design of the planned Facility direct grant to MoFLSS for social assistance[50], especially if they target assistance to individuals based upon personal vulnerability criteria, rather than upon family structure.

e. Direct outreach to bring refugees into registration

All humanitarian partners, but in particular the partners managing community centres, supported refugees to access registration. This was deliberate: 'ECHO seeks to use outreach, intake, case management and referral as a basis for enhancing protection, primarily through supporting registration to regularise the status of refugees so they can benefit from services.'[51] Some partners were actively mandated to reach out and find unregistered refugees. For example, GOAL, in partnership with the Turkish NGO Development Workshop, sought out unregistered Syrian Doms and seasonal agricultural workers (SAW) in remote rural areas, and brought them into the registration system. Similarly, TRCS, which was the only humanitarian partner that maintained its ability to conduct household visits and outreach after the authorities started limiting NGO outreach (see below), actively sought out unregistered refugees and supported them to access their local PDMMs. In some cases, this was an outreach activity of a TRCS community centre (as for example in Mardin the TRCS community centre actively seeks out Syrians working in rural irrigation schemes, and reclusive Yazidis in urban areas)[52], and in other cases, TRCS staff conducting household visits in conjunction with ESSN or CCTE would identify families or individuals with registration problems, and support them to register.

There is no comprehensive quantitative data available on the number of referrals to DGMM for registration, but as an illustration, a study of the Case Management (CM)[53] and Individual Protection Assistance (IPA)[54] support provided by six NGOs[55] showed that, in 2018–2019, 30% of NGO referrals to state services were to DGMM for registration or regularisation of registration data.

[46] There are other reported 'distortion incentives', including the reported incentive for refugees receiving ESSN to avoid obtaining an official work permit, and the incentive for families to have more children in order to qualify or to remain qualified, but these are not examined within the scope of this report because they do not have immediate protection consequences.
[47] KIIs.
[48] Cuevas, P. Facundo, O. Kaan Inan, Aysha Twose, and Çiğdem Çelik. (2019). *Vulnerability and Protection of Refugees in Turkey: Findings from the Rollout of the Largest Humanitarian Cash Assistance Program in the World*. World Bank and World Food Programme
[49] KII.
[50] KII.
[51] DG ECHO. (2017) ECHO Turkey Management Framework 2016–2018. Ankara. EU.
[52] KII.
[53] Case Management is a process that enables a tailored and usually multi-step response with detailed documentation and continuous support until the protection problem is resolved – or no further progress can be made.
[54] As a complement to Case Management, Individual Protection Assistance is provided to individuals who are in need of support for a single intervention or to achieve one main protection outcome (responsive or preventative). IPA can be assistance in kind or in cash, such as one-off support for legal assistance or for a medical intervention, but it must lead to a protection outcome in order to qualify.
[55] CARE. (2019). *ECHO Partners CM/IPA Data Review* (internal study commissioned by ECHO).

f. Incentives of access to services

Finally, it needs pointing out that, with or without deliberate Facility support for registration, and even without the added incentives of ESSN and CCTE, the Turkish policy of providing access to health and education services to registered refugees already provided a very powerful and universal incentive for registration.

Box 2 The contribution of the Facility to registration: national view

The contribution story regarding registration is that the Government of Turkey provided the foundational pre-requisites by passing the legislation and building the institutional framework for registration (supplying registration services), and providing powerful policy incentives (demand) for registration by making health care and education accessible to registered refugees.

The contribution of the Facility was to strengthen the performance of the government system (through UNHCR), to add further registration incentives by creating EU-funded programmes contingent upon registration (notably ESSN and to a lesser extent CCTE), to investigate registration gaps through protection monitoring, and to facilitate the process of registration by supporting a wide range of NGO partners to identify and support refugees to register. Registration was not fully successful in Turkey (as we shall discuss below), but the Facility did make considerable efforts to support it.

ii. Constraints encountered by Facility partners and attempts to overcome them

The registration (and protection) environment of Turkey was adversely affected by a number of political and administrative factors over the lifetime of the first Tranche of the Facility. This section explores some of these factors, and then considers three defining variables in the registration and protection environment in Turkey: (a) whether the refugee is Syrian or non-Syrian; (b) whether the refugee is registered or unregistered and the characteristics of unregistered refugees; and (c) the particular challenges facing refugees who are registered but outside their province of registration.

a. Government reluctance to share information and research

Information on refugees is essential for their protection. All actors, government and non-government, and in every sector, need to know how many people (and of what age, gender, education level and particular vulnerabilities) are in their jurisdiction: without this basic data it is next to impossible to plan and to allocate resources according to needs. In Turkey, the government restricts the collection and sharing of personal data in ways that are similar to privacy regulations in Europe. However, the Turkish government goes two steps further. First, the government does not make available anonymised and disaggregated demographic information that would help Turkish and international organisations to plan their service delivery. Second, the government tightly regulates the conduct of widespread household surveys and profiling. Some useful population-wide surveys are permitted on specific topics, for example the WFP CVME surveys, IOM's flow monitoring and provincial baseline assessments, and academic surveys such as Syria Barometer. But at the same time, as early as 2013 UNHCR was stopped at the eleventh hour from conducting a national refugee profiling exercise[56] and has not been able to do a national refugee survey since then. And the Facility itself has not been able to conduct refugee profiling surveys to support its planning and reporting (for example, the government did not approve the Commission's recent request to conduct surveys intended to fill data gaps in its performance monitoring framework).

b. The 2016 attempted coup, and narrowing of protection and outreach space

From the start of the urban phase of the Syrian refugee response, from 2013 onwards when the numbers of Syrians surpassed the capacity of the government-managed Temporary Accommodation Centres (and Syrian refugees spread out across the country – as they were at that time permitted), a number of international organisations were allowed to operate freely in Turkey even though they might even then have been technically required to obtain various permits to do so. Turkish authorities tolerated these activities and, for the most part, municipalities were grateful for the international support. However, even before the attempted coup of 15 July 2016, the government had begun to enforce the

[56] UNHCR. (2016). Evaluation of UNHCR's Emergency Response to the influx of Syrian Refugees into Turkey, Geneva, UN.

existing regulations and constrain the work of some international organisations, especially health NGOs that were operating some clinics outside the Turkish health system.

The attempted coup then brought about some abrupt changes and a shift towards firm government control. First among these was that many normal operations of UN agencies and NGOs that required government inputs and approvals were slowed down or paused for several days or weeks during the immediate post-coup period. Second, there was a widespread change-over of government staff, with the result that many established relationships and processes were interrupted, and there was an accompanying 'chill effect' on the public activities of many academics, teachers and NGO workers. Third, the government issued a decree that withdrew the operating permits for several national and international organisations, resulting in the immediate freeze of activities and abrogated contracts. Protection and health NGOs were particularly affected by these measures, including many humanitarian partners, but the major structural Facility programmes that worked primarily with government intermediaries (CCTE, SIHHAT, PICTES, DGMM/verification etc.) were able to resume activities with little hindrance after brief delays.

Throughout 2017 the government introduced a number of further measures to limit the operating space for NGOs[57]: for example, some NGOs were pursued by the authorities for irregular employment of refugees[58]; the government started screening NGOs working on Facility projects and refusing some operating permissions; the government even prevented the Commission from signing agreements for four protection projects[59]; and in every sector the government started enforcing regulations requiring organisations to have specific permissions to operate in their sector and in their province (known in Turkey as 'protocols')[60]. As part of this regulatory tightening, protection NGOs were informed that they no longer had permission to conduct household visits or outreach programmes, severely curtailing their ability to execute the outreach component of their protection mandates. Similarly, NGOs operating community centres have been constrained on what services they can offer, and prevented from offering health, education, technical training, psycho-social support (PSS) and legal services that are not officially approved as meeting national standards. The widespread exception to this trend was TRCS, which (together with UTBA) enjoyed a special status in Turkey as an auxiliary organisation with a special legal status and trusted relationship with government[61].

The operating environment continued to be constrained until late 2019, when it became tighter still after the 2019 local elections[62]. Since then, there was a policy decision by MoFLSS to centralise operating permits for NGOs at the national level (until that point local protocols could be signed at province level), after which operating permits were no longer issued. Since mid-2020, most NGOs in Turkey, as far as the evaluation team can determine both national and international, are still awaiting formal permission from Ankara for their operations[63]. These constraints disproportionately affect protection partners (and the work of these organisations to support refugee registration), because most other sectors have converted over to government implementation, leaving a concentration of NGOs in the protection sector.

c. The contribution of the Facility to registration in light of the difficult operating context

The Facility and its partners have done what they can to gather information on refugees (especially vulnerability data) and to maintain their outreach services, but they have been obliged to proceed cautiously, following the letter of the regulations whenever there is any doubt. Most NGOs are currently confined to providing services within their offices and community centres, and have stopped household visits and mobile services, as well as in-person public information campaigns. To a small extent they have been able to compensate by building up their online services, and this has accelerated during the time of COVID-19, but the range of NGO protection services available in 2020 is a shadow of its former coverage[64]. The EU has been open about its concern with the limitations on outreach, noting in successive Steering Committee meetings the impact this has upon protection effectiveness, but it has not been successful in its advocacy on this matter. In the end, the problem facing the International

[57] https://www.thenewhumanitarian.org/news/2017/04/27/Turkey-steps-crackdown-humanitarian-aid-groups
[58] Commission project reports.
[59] European Court of Auditors. (2018) *Special report No 27/2018*. Brussels. EU para 47.
[60] Operating permissions were initially limited by the then MoFSP on the grounds that government was to provide services, but then relaxed in 2018 and for most of 2019 to allow NGOs to negotiate operating permits on a provincial basis, and then restricted again from late 2019 – when the authorisation of permits was recentralized to the level of MoFLSS.
[61] KII.
[62] KIIs.
[63] KIIs.
[64] KII.

Protection community is that the operating environment for NGOs is seen as a matter of national sovereignty, and if the government does not wish to encourage the work of civil society and visible support for refugees, then the government can use regulatory mechanisms to implement this policy decision.

d. Provincial receptivity to refugees

Syrians are not restricted by national regulation on where they live and register (what the law requires is that they be in their province of registration in order to receive services, and supplementary regulations also require Syrians to seek authorisation to travel to different provinces)65. The vast majority of Syrians were not in camps and were already spread out across Turkey, with different forms of local registration, when the government decided to introduce a nationwide registration system. It was in this process of national registration (and later, verification) that variations in provincial registration practice became visible. The evaluation team has identified four main factors behind different provincial approaches: cultural affinity, national security, national-provincial politics and the structure of the local economy.

Cultural affinity

In terms of cultural affinity, Syrian refugees were initially welcomed, and remain welcome, in provinces along the southern border where some Arabic is spoken, and where there are long-standing cross-border cultural and family ties. Similarly, Kurdish-speaking Syrians have generally experienced a favourable reception and easier access to government services in Kurdish-speaking regions of the south-east[66]. In all of these regions, registration proceeded without opposition. Finally, there are some pockets across the country where refugees are welcome for very local reasons: for example many Syrian refugees gathered in Bursa, which received 60,000 Bulgarian refugees of Turkish heritage in 1989, and which identifies itself as a welcoming city for refugees[67]. In these regions Syrians are seen by some (but not all) as beneficial to the local economies.

Security sensitivity

Hatay province is perceived to be particularly sensitive for Turkish security: in the early 20th century the province was briefly part of Syria, during the main refugee influx it was the main point of arrival for refugees from western Syria, and until recently it was one of the few remaining crossing points between Turkey and Syria. The province has a limited economic base and hosts a very large number of refugees: from 2018 onwards the local authorities have not permitted new refugee registrations, instead asking newly arrived refugees to travel on and register in other provinces[68].

Istanbul, a combination of refugee concentration with limited resources, and national political factors

Istanbul stopped registering refugees and inter-provincial transfers from 2018 onwards: according to the authorities this was because of the very large numbers and sub-provincial concentrations of Syrians attracted by the favourable employment market. Refugees then became a political issue in the Istanbul municipal election of mid-2019, and on 22 July 2019 the Governorate of Istanbul issued a press release announcing that unregistered refugees would be removed from Istanbul by 20 August (later extended to 30 October 2019). Following the Istanbul decision, and possibly concerned about the knock-on effects of Istanbul displacements, several other provinces stopped new registrations and inter-provincial transfers, including Bursa and Izmir. While the evaluation team was not able to obtain a definitive list, it was reported that as of early 2020, 15 provinces[69] are no longer accepting Syrian refugee registrations or inter-provincial transfers (registration of newborns and registration for compelling humanitarian reasons remain permitted everywhere).

The Istanbul situation merits some further explanation, because of the extraordinary re-displacement of refugees that took place after July 2019. Officially, the number of Syrians in Istanbul in mid-2019 was around 500,000, and the verification exercise was stopped in Istanbul when it reached that number. The official number of Syrians registered in Istanbul at August 2020 is 507,773[70]. However, Istanbul

[65] The movement of Syrians in Turkey was completely unregulated until the government issued DGMM Circular No 55327416–000–22771 of 29 August 2015 on 'The Population Movements of Syrians within the Scope of Temporary Protection'.
[66] KII.
[67] Note, however, that this receptivity has recently cooled as Bursa has reportedly stopped Syrian refugee registration since late 2019.
[68] KII.
[69] Possibly Istanbul, Edirne, Tekirdag, Kirklareli, Kocaeli, Canakkale, Bursa, Balikesir, Izmir, Aydin, Mugla, Antalya, Hatay, Osmaniye and Yalova, as reported by https://www.asyluminEurope.org/reports/country/Turkey/freedom-movement.
[70] DGMM website https://en.goc.gov.tr/temporary-protection27.

was known to have a substantial number of Syrians who were either unregistered, or (more commonly) registered in other provinces and living in Istanbul. In late 2018, Istanbul officials estimated the number of irregular Syrians in Istanbul as 300,000[71]–500,000[72]; the number 500,000 has been used in various contexts (media reports etc.) although at that time the number was not substantiated. The best available evidence that the team has found is the set of baseline assessments conducted by IOM[73], which showed in May 2019 there were 640,000 more refugees and irregular migrants in Istanbul than officially registered[74]. Importantly, this was 250,000 more than those reported in the previous baseline assessment in November 2018, suggesting that the number of unregistered or out-of-province refugees in Istanbul was growing rapidly in the months before July 2019. The estimated numbers of unregistered or out-of-province Syrians in Istanbul was estimated as 295,000 in 2018, and 362,000 in 2019.

Following the 22 July 2019 instruction to Syrians to return to their provinces of registration, approximately 100,000 Syrians left Istanbul[75] (about 35,000 of whom returned to their provinces of registration, about 65,000 others[76] were directed to other provinces where registration was open, and reportedly 6,416[77] were sent to the few remaining camps), and a further 42,888 irregular migrants were sent to detention centres in several cities[78]. The fate of the other unregistered refugees who were not recorded as leaving Istanbul is not known, but that number could still be around 400,000, and most of them could still be in Istanbul[79].

Economic factors

Finally, some provinces had economic reasons for discouraging or favouring refugees. On the side of discouraging, there are a number of tourism-dependent provinces along the Mediterranean and Aegean costs that have long made it difficult for Syrians to settle and register, and indeed many of those are now reportedly closed for registration. In contrast, some agricultural regions have welcomed refugees as SAWs, although registration for these populations is particularly problematic because of their mobility and inability to obtain a *nüfus* registration (as discussed below).

The contribution of the Facility to registration: provincial view

From a contribution analysis viewpoint, this discussion of provincial variations illustrates that the success and ease of registration is not only determined by technical factors, but is also highly influenced by local cultural, political and economic factors that are entirely outside the control of the EU. In all cases where registration was inhibited, partner project reports and interviews demonstrate that Facility partners did what they could to mitigate these effects, in particular building local relationships that allowed case-by-case consideration of registration and regularisation of refugees experiencing exceptional hardship or with strong humanitarian cases for family reunion.

e. Non-Syrians

The registration challenges facing non-Syrian refugees are entirely different. For decades, non-Syrians were registered by UNHCR (through their local partner ASAM), and assigned to a limited number of satellite cities[80], with the aim of dispersing non-Syrians across the country and avoiding the major metropolitan areas where resources were already stretched. As of October 2018, there were 368,200

[71] KII.
[72] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU.
[73] (2018) Baseline Assessment in Istanbul Province, Ankara, IOM, (2019) Baseline Assessment in Istanbul Province, Ankara, IOM
[74] Once some adjustment is made for groups like Uzbeks, Turkmen, Azerbaijanis, Chinese Uyghurs, Georgians etc who are included in the 640,000 total, it seems likely that the total number of irregular migrants who could potentially be refugee applicants (Syrians, Afghans, Iranians, Iraqis, Pakistanis, Nigerians etc.) was around 500,000.
[75] Media reports, for example https://www.dw.com/en/Turkey-nearly-100000-unregistered-Syrians-removed-from-istanbul/a-51888092
[76] Several interviewees estimated the number of removed Syrians as 100,000: KIIs.
[77] AIDA (2020). *Country Report: Turkey*, reporting statements by Istanbul PDMM officials.
[78] Ibid.
[79] Very granular IOM data on refugee distribution by sub-province of Istanbul shows that there is a significant concentration of Uyghur Turks (Chinese nationals) in Küçükçekmece, Zeytinburnu, Fatih and Silivri (reportedly migrating to Turkey from other countries that have signed extradition agreements with China); Pakistanis in Esenler and Sultangazi; Afghans in Zeytinburnu, Ataşehir, Sultangazi, Üsküdar, Beykoz, Bağcılar, Esenler and Fatih; Uzbeks in Fatih, Maltepe, Beyoğlu and Zeytinburnu; Nigerians in Beyoğlu; and Turkmen in Avcılar and Kağıthane. Uyghurs, Turkmen and Uzbeks seem to be intending to stay in Turkey, as well as Afghan Turkmen. In contrast, Georgians (many of Azerbaijani origin), Non-Turkmen Afghans, Pakistanis and all African nationalities seem to be in transit to Europe, many earning money in Istanbul to pay for the next stage of their journey. New and rapidly growing sub-groups in Istanbul in mid-2019 were Somalis and Congolese.
[80] The number seems to vary each year but is around 62 in 2019.

non-Syrians registered in this way[81]. However, since registration of non-Syrians was been taken over by DGMM and managed in a decentralised way through PDMMs, the precise number of non-Syrian refugees (International Protection status holders) has not been made public by DGMM. The handover from UNHCR to DGMM has had two further consequences that are of growing concern to the protection community. First, even before the onset of COVID-19, the rate of non-Syrian registrations had slowed down dramatically[82] and registration backlogs had increased[83] although DGMM does not provide data on this[84]. The rate of refugee status determinations has also sharply slowed[85], and the quality of determination processes has decreased[86]. Second, it has been reported that PDMM decisions have become more arbitrary[87], and a variation in registration practices has quickly emerged between different nationalities of asylum seekers – with Afghan asylum seekers the most disadvantaged[88].

Legislative changes enacted on 24 December 2019 have also placed increased pressure on non-Syrians. There are two important changes (i) a change to Article 53 of the Temporary Protection Regulation (TPR), which shortens the appeal period before deportation from 15 to 7 days, rendering it almost impossible for asylum seekers facing a removal order to obtain legal assistance[89], and (ii) a change to Article 89, as a result of which International Protection status holders lose their state health insurance after a year – a decision that in some cases has been applied retroactively with the effect of immediately cutting off their access to free health care.

The evaluation team has looked in some depth at the different profiles of non-Syrian refugees and at the differences in their registration and protection. In addition to the information provided above, the general profile of an Afghan in Turkey is that he (or she, but more likely he) is young and single, relatively less educated than other refugees (50% no education or only primary school)[90], and probably stayed for a long time in Iran before coming to Turkey. While in Turkey, they are the refugee nationality least likely to be registered[91], and with the least access to services[92] (partly because of their registration status, but also because of language and other cultural barriers). Afghan children are at particular risk: 95% of the minors helped by one partner NGO were Afghan males 16–18[93], and according to the IOM Flow Monitoring Survey (24 provinces sampled), between 45–55% of Afghan children were travelling unaccompanied – again suggesting a particularly high-risk group[94]. Finally, while there could be approximately 95,000 unregistered Afghans in Istanbul[95], they do not all intend to move on to Europe. It seems that about 50% of Afghans in Istanbul do plan to move on[96], but that the remainder, and according to interviews most of the Afghans in other provinces, intend to stay in Turkey, where many are successfully employed in the agriculture sector.

In contrast, Iranian refugees are much more educated (the most of all refugee nationalities), their country-of-origin employment profile was more professional, and as many as 96% of Iranians intend to

[81] This is the latest number reported publicly by UNHCR before they stopped controlling and publishing this data.
[82] The KII consensus was that DGMM is still keen to register and regularise Syrian refugees, albeit not in all locations (as discussed). But at the same time, fewer non-Syrians were coming forward for registration for fear of apprehension.
[83] Five KIIs. and AIDA (2020). *Country Report: Turkey.* There is speculation that the slowdown in registration is a deliberate practice to limit the number of non-Syrians granted status in Turkey (https://www.asyluminEurope.org/reports/country/Turkey/registration-asylum-application), although other observers feel that there is also a genuine lack of capacity especially given that registration is now conducted nationwide by PDMMs, many of which are not sufficiently prepared for this sensitive and technical work (KIIs.).
[84] KII.
[85] KIIs., Refugees International, (2019), Insecure Future: deportation and lack of legal work for refugees in Turkey, Izza Leghtas, KII. DGMM informed the Evaluation Team that the rate of RSD decisions increased by 80% in 2020 compared to 2019, but the data on the number of decisions has not been provided to the Team.
[86] KIIs., AIDA (2020). *Country Report: Turkey.* According to the AIDA report, practice on the examination and the decision-making at first instance is not uniform across provinces. The quality of interviews, the assessment of evidence, the lack of identification of vulnerable groups, the lack of training of migration experts, as well as the lack of available interpreters, have been reported as particular concerns. Quality gaps at first instance have also been identified by Administrative Courts in certain cases.
[87] AIDA (2020). *Country Report: Turkey*, citing a Turkish government Court of Auditors report on DGMM.
[88] Several interviewees were unanimous in this opinion, although there is no evidence of a government policy regarding Afghan asylum-seekers. There were reports of Afghans not been granted IP status but instead being asked to apply for residence permits (or be sent to administrative detention for deportation). Residence permits only provide short-term protection and do not provide access to the same range of social services as IP status-holders. See https://www.asyluminEurope.org/reports/country/Turkey/registration-asylum-application. Several interviewees reported that Afghans are pushed by PDMM to go to a different province to register (KIIs.). Afghans are also, by far, the largest group of refugees with recorded apprehensions: 201,437 in 2019, according to DGMM.
[89] KIIs.
[90] Mixed Migration Centre, (June 2020), Destination Unknown Afghans on the move in Turkey.
[91] 31% are unregistered, according to (2018) Flow Monitoring Survey July-August 2018, IOM, Ankara.
[92] Weaker access to health services is documented by Wanda Spahl and August Osterle, Comparative Migration Studies. *(2019). Stratified membership: health care access for urban refugees in Turkey.*
[93] KII.
[94] (2018) Flow Monitoring Survey December 2017 – February 2018, IOM, Ankara, (2018) Flow Monitoring Survey July-August 2018, IOM, Ankara.
[95] (2019) Baseline Assessment in Istanbul Province, Ankara, IOM.
[96] (2018) Flow Monitoring Survey July-August 2018, IOM, Ankara.

move on from Turkey[97]. Interestingly, LGBTI data shows that the largest (and best-organised) group of LGBTI refugees is Iranian[98].

We will return to review the differential access to services according to nationality later, but already in this discussion of registration we can conclude that, even though UNHCR and the EU were advocating a 'one refugee approach', Turkish legislation and DGMM systems and practices made sharp distinctions between Syrians and non-Syrians, with Syrians generally favoured in all domains.

iii. How well has the Facility addressed these constraints to registration?

The Commission made an important management decision, early in the response, to establish field offices in Istanbul and Gaziantep[99]. These offices enabled the Commission to better situate its protection programming in its varied and rapidly changing local contexts, and to develop relationships with a range of local actors outside the traditional humanitarian orbit including national NGOs, academics and local governments. The Facility has also funded UNHCR and DRC to undertake protection monitoring, and WFP to carry out its important survey work. From this base of improved data and local relationships, the Commission could better target humanitarian activities to fill specific gaps in coverage (especially for Syrians), and to address the different protection challenges of the Istanbul and south-eastern border regions. There is clear evidence of the Commission deliberately planning its humanitarian support for NGOs to diversify the distribution of community centres, and to develop targeted projects (or components to projects) for refugees that were hard to reach, including refugees and asylum seekers in immigration detention, Syrian Doms, SAWs and LGBTI refugees. When UNHCR saw a change in the registration context (e.g. blockages to verification or the abrupt policy change in Istanbul), the Commission was quick to adapt projects by approving modification requests and project top-ups[100].

The development projects implemented by EUTF Madad with TRCS and ASAM also adapted to difficult and rapidly evolving contexts. For example, ASAM reallocated resources after they were prohibited from conducting outreach visits[101]; and TRCS ran a special operation in Istanbul from October 2019 to March 2020, setting up a second office especially for this operation and working closely with PDMM, to relocate 5,000 very vulnerable Syrians to appropriate provinces[102]. Both ASAM and TRCS remarked that Commission staff had been very supportive and flexible throughout challenging times[103].

Despite these programmatic efforts, the EU did not make significant progress on a number of key advocacy files, even when working in tandem with other advocates. Notably the donor community could not overcome DGMM's reluctance to share data, they were unable to persuade GoTR to reverse its decision to close down some NGOs, and they did not succeed in reversing the policy decisions prohibiting NGO outreach[104]. Although the Facility has continued in Tranche II to finance the work of UNHCR supporting DGMM with its registration of non-Syrians (a project that was not assessed by the evaluation team), DGMM is no longer providing information on the registration of non-Syrians, the rate of registration has slowed, and some refugee groups, Afghans in particular, appear to be systemically disadvantaged.

It is not clear whether the EU could have made more progress on these matters. The dialogue between the EU and Turkey has been difficult and sensitive, particularly on matters of border management and refugee movement. Many of the recent challenges (such as the Istanbul policy decision and its aftermath) took place at the same time as the EU and Turkey were having difficult discussions about the Turkish proposal to create a safe zone for refugees to return to in northern Syria. Later, there were similar discussions about the land border crisis when the GoTR encouraged migrants to cross into Greece at Edirne.

[97] (2018) Flow Monitoring Survey July–August 2018, IOM, Ankara and (2018) Flow Monitoring Survey December 2017 – February 2018, IOM, Ankara.
[98] Turkey's challenge with LGBTI refugees, 2018, KAOS, Ankara.
[99] The Gaziantep office was created early in the response primarily with a cross-border mandate.
[100] KII.
[101] KII. It is also important to note that the ASAM Madad project was the only Facility protection project focussed entirely on the protection of non-Syrian refugees in Turkey.
[102] Internal report provided by TRCS to the evaluation team.
[103] KIIs.
[104] The encouragement for the EU to advocate more on behalf of NGOs was reinforced by the recommendation of the European Court of Auditors that 'The Commission should use policy and high-level political dialogue with the Turkish authorities to improve the operating environment for (I)NGOs in Turkey.'

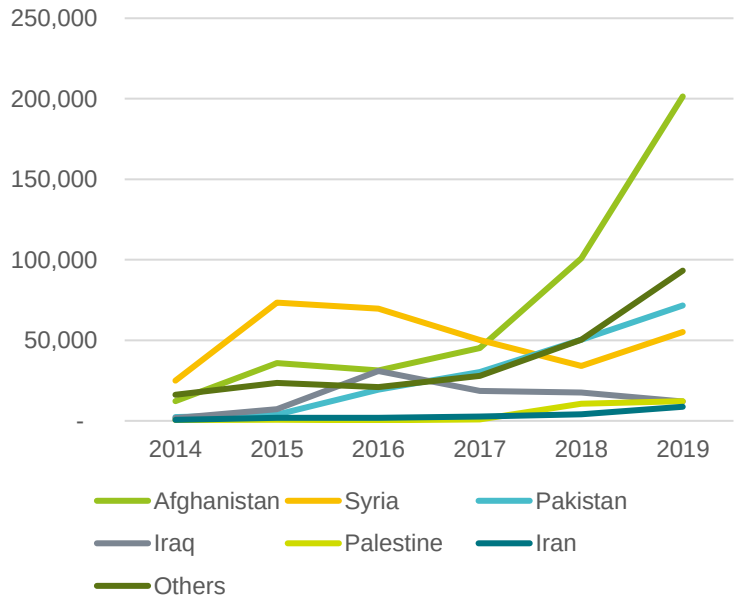
In conclusion, the Facility's main protection investments to date have been to support the registration and regularisation of Syrians, and comparatively little has been invested in non-Syrian registration and registration referrals[105].

Since mid-2020, the lack of support and capacity for non-Syrian registration by DGMM would seem to be the single biggest protection problem facing non-Syrian asylum seekers in Turkey.

a. Irregular migrants and unregistered refugees

While there is no reliable count of unregistered refugees, after 8 years' experience and various studies it is possible to describe who and where they are in broad terms (see discussion below). The bigger variable about which even less is known, is who are the irregular migrants in Turkey. An irregular migrant could be a tourist or work permit holder overstaying a visa, a foreign criminal, or someone crossing into Turkey illegally and without a clear intention whether to stay or travel onwards through Turkey to Europe. There could be a very large number of irregular migrants in Turkey, and the available data from DGMM on apprehensions suggests either that this number is growing fast (454,662 apprehensions in 2019 alone), or that the effectiveness of GoTR apprehensions has grown (Figure 5).

Figure 5 DGMM data on apprehensions of irregular migrants (2014–2019)



This is important because even though the Facility is not generally concerned with irregular migrants[106] (except for the small Facility component on migration management), any irregular migrant can become an asylum seeker by requesting the protection of the Turkish government and making a claim for international protection at any PDMM office. This is key, because most of the attention to date has focused upon the problems of unregistered Syrians, and yet in the universe of non-Syrians there are a large number of Afghans, Pakistanis, Georgians, Chinese Uyghurs, Uzbeks, Palestinians, Nigerians etc.[107] who could claim refugee status at any moment.

In comparison to the potentially numerous implementing partner (IP) applicants, DGMM's published information on IP applicants in 2019 is a relatively modest number (see Figure 6).

Figure 6 DGMM data on International Protection applicants in 2019

Afghanistan	35,042	62%
Iraq	15,532	28%
Iran	3,558	6%
Others	2,285	4%
Totals	56,417	100%

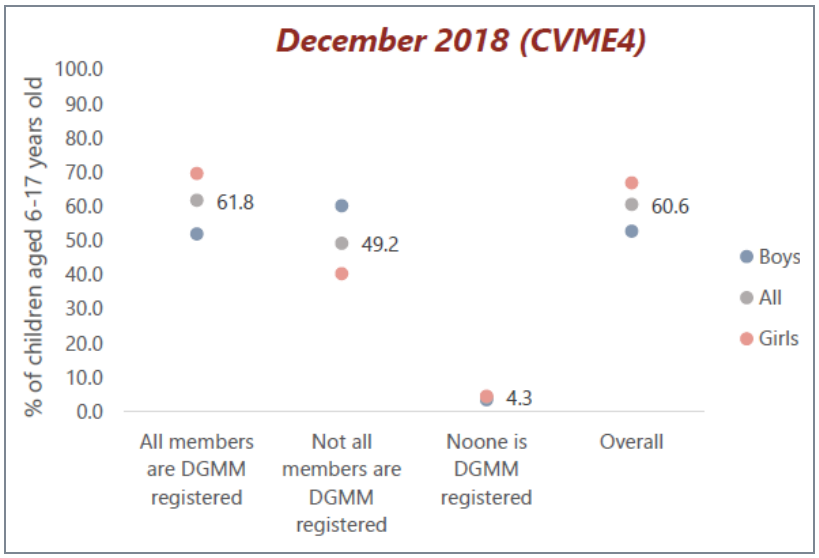
Turning now to the data on unregistered refugees that is a little more certain, profiling data that can be extracted from CVME4 and CVME5 suggest that unregistered refugees are not poorer than registered refugees (which would be consistent with the hypothesis that unregistered refugees are unregistered in part because they are working and do not need ESSN benefits), that they

[105] The Facility projects explicitly supporting non-Syrian registration (and registration referral) were components of the UNHCR projects with DGMM, and the Madad project with ASAM. Some non-Syrians have also been supported by other Facility projects that took place in provinces with small non-Syrian populations alongside large Syrian populations.
[106] 'ECHO's programmes will focus on people likely to stay in Turkey until safe return is possible, rather than on persons with the resources to seek solutions through onward migration.' DG ECHO. (2017) ECHO Turkey Management Framework 2016–2018. p. 8
[107] IOM data shows that in Istanbul there were several nationalities of irregular migrants in early 2019, for example over 40,000 irregular Turkmen, 25,000 irregular Uzbeks, 15,000 irregular Pakistanis, and 6,000 irregular Nigerians.

are slightly more likely to have smaller families with male household-heads, and that they mostly have access to health care (possibly through emergency services).

However, there was an important difference in education, with the children of unregistered refugees, especially girls, much less likely to be in school. To illustrate this data, see Figure 7.

Figure 7 Education access of registered and unregistered refugees



Regarding which nationalities are more or less registered, there is partial data (not national sampling) from IOM that suggests that 31% of Afghans in Turkey are not registered with the authorities, 12% of Iraqis, 7% of Iranians and 6% of Syrians[108]. Historically, it has been widely assumed that about 10% of Syrians in Turkey were not registered[109]. This is consistent with analysis of two main published sources:

1. The *Facility Needs Assessment* August 2018 analysed data available until that point and concluded that: 'Between 6.5% and 9% of about 3m Syrians living outside of Istanbul are unregistered, that is a number ranging between 195,000 and 270,000. Between 12% and 17% of about 560,000 Syrians living in Istanbul are unregistered, that is a number ranging between 67,800 and 95,200.'[110]
2. CVME3 data shows that 11.6% of refugees in Turkey in 2018 were unregistered but are either on a registration waitlist or that they intend to register. If DGMM has registered 3.62m in 2018, then this would suggest 475,000 refugees or migrants were unregistered (and that does not include people who are avoiding registration or see themselves as in transit to other countries). CVME4 data (9.9% unregistered) shows that the same calculation for 2019 has 405,000 unregistered refugees in Turkey.

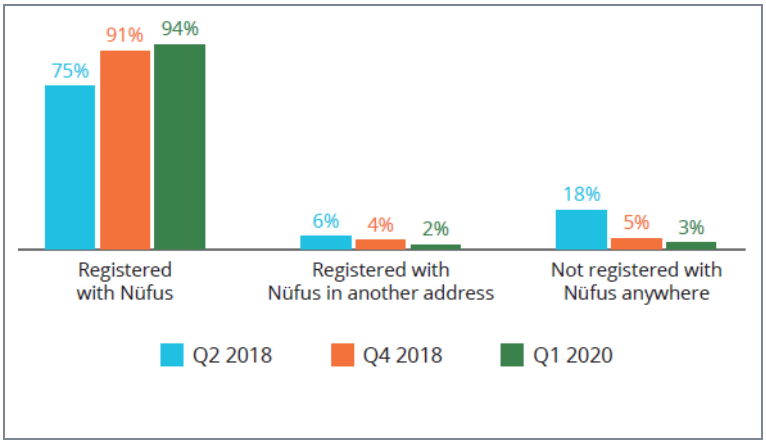
It is possible to make additional calculations from these base numbers, as done by Franck Düvell[111] and Murat Erdogan[112] in their studies, which consider departures to Europe, voluntary and involuntary returns to Syria, and births, in order to come up with more complex numbers. But the end result is approximately the same: somewhere between 350,000–450,000 refugees in Turkey, mainly Syrians, were until 2019 assumed to be unregistered.

However, this might be different in 2020. There is very important new data from WFP's CVME5[113], which reportedly followed a similar and equally robust sampling methodology as CVMEs 3 and 4, that the sampled proportion of unregistered refugees in Turkey has come down from 11.6% in CVME4 to less than 2%, of whom half are pending registration. This striking data suggests that the challenge of refugee registration in Turkey has been almost entirely solved.

[108] (2018) Flow Monitoring Survey July–August 2018, IOM, Ankara.
[109] KIIs.
[110] Biehl, K. et al. (2018). Technical Assistance to the EU Facility for Refugees in Turkey 2017/393359/1): *Needs Assessment Report Final Report.* Brussels: EC.
[111] (2019), Are there really 3.6 million refugees in Turkey or could there be considerably fewer?,Dezim Institut, Frank Düvell
[112] (2020), 10th Anniversary of Syrian refugees in Turkey, Murat Erdogan, Ankara.
[113] WFP. (2020). Comprehensive Vulnerability Monitoring Exercise (CVME) Round 5, Ankara.

Whether or not this data is as robust as claimed[114], there are several converging factors and other sources of evidence that show that the number of unregistered Syrians is indeed reducing. First, there is the dramatic change in the proportion of refugees who are properly registered at their residence in their province of registration – which is a pre-requisite for access to ESSN (see Figure 8)[115].

Figure 8 Evolution in *nüfus* registration (image and data from WFP CVME5)



A second factor is the greatly increased sense of security and confidence that refugees (particular Syrian) feel in Turkey. This is well-researched by Murat Erdogan, whose Syria Barometers have traced a clear increase since 2017 in the extent to which Syrians feel integrated in Turkey, and also feel closer social distance to Turkish citizens (see Figures 9 and 10)[116].

Figure 9 Turkish (left) and Syrian (right) feelings of social distance from the other nationality (Syria Barometer 2019)

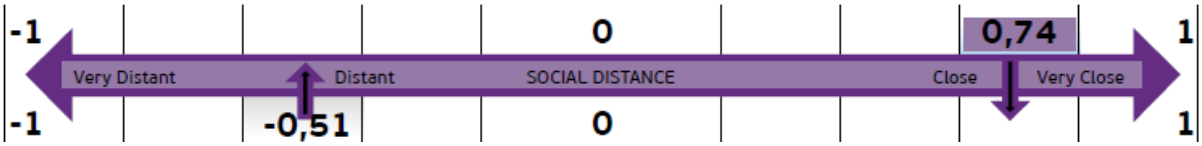
SB-2019-TABLE: Social Distance Measurements in Comparison

Social Distance of Turkish Society

Social Distance Groups			
	#	%	Social distance score
Very distant	1157	51,0	-0,97
Distant	347	15,3	-0,55
Neither close, nor distant	383	16,9	-0,10
Close	244	10,8	0,36
Very close	135	6,0	0,87
General	**2266**	**100,0**	**-0,51**

Social Distance of Syrians

Social Distance Groups			
	#	%	Social distance score
Very distant	13	0,9	-0,85
Distant	32	2,3	-0,29
Neither close, nor distant	156	11,1	0,18
Close	328	23,2	0,53
Very close	1882	62,5	0,97
General	**1411**	**100,0**	**0,74**



[114] CVME5 had a heavy bias towards provinces with large Syrian populations and did not sample any of the Kurdish-speaking provinces in the South-East, nor did it sample the North and East of Turkey, nor major regions of the south-west.
[115] The 'nüfus' is the term popularly used to describe the document received when registering residence with the Directorate-General of Population and Citizenship (DGPC, or *Nüfus*). A *Nüfus* as well as a 99-series Identity Document are both needed to qualify for ESSN. *Nüfus* is difficult to obtain if the landlord has not registered his or her property as a rental unit, or if the rented accommodation is illegal or a partly-finished construction, or if the refugee is living in a tent, and remains an obstacle to ESSN access for a small number of refugees. Some refugees complain that landlords abuse their control of the nüfus to extort refugees.
[116] There is however consistent evidence from several sources, including Syria Barometer, IOM and WFP, that the proportion of Syrians who are considering moving to Europe has increased in the last year.

Figure 10 Turkish (left) and Syrian (right) sentiments regarding Syrian integration in Turkey

SB-2019-TABLE: To what extent have Syrians integrated into Turkish society/Turkey?

	#	%
Completely	52	2,3
To a large extent	248	10,9
Partially	452	19,9
To a little extent	413	18,2
None at all	1050	46,2
No idea/ No response	56	2,5
Total	**2271**	**100,0**

SB-2019-TABLE: To what extent have the Syrians integrated into Turkey/Turkish society?

	#	%
Completely	119	8,4
To a great extent	613	43,2
Partially	523	36,9
To a very little extent	95	6,7
Not at all	25	1,8
No idea/ No response	43	3,0
Total	**1418**	**100,0**

Importantly for protection – and this is one of the main points made by the Syria Barometer – the opinion of Turkish citizens seems to be moving in the opposite direction: the more comfortable Syrian refugees feel, the less comfortable Turkish citizens feel. But for the purposes of this discussion about registration, the increasing sense of security and belonging on the part of Syrians in Turkey is, at least in part, both a consequence and cause of registration; a cause in the sense that Syrians have less and less to fear about registration, and more to gain.

Third, interviewees strongly concurred that by 2020, nearly all refugees in Turkey know how to register[117], and if they are not registered by then, it is for a very limited number of reasons – not lack of awareness of the process. Suggested reasons include: (i) a desire to stay off the radar to keep open the options to move on to Europe (more likely for non-Syrians)[118]; (ii) security concerns (perhaps the person is a criminal or a former combatant)[119]; (iii) desire to keep internal mobility options open, especially for work or to stay with relatives who live in a province that does not allow new registrations[120]; (iv) living in a remote area (usually as a seasonal agricultural worker)[121]; (v) some new arrivals (these numbers are smaller all the time, but there are still registration backlogs for Syrians in some locations and larger backlogs for non-Syrians); and finally (vi) there is a significant group of Syrians who have been de-registered and cannot re-register, known as 'V87' cases because of the code on their immigration file[122].

De-registered Syrian refugees are of two types. There are some Syrians who were de-registered as a result of being no-shows at verification. These are thought to number around 100,000 according to internal Commission project reports, an estimate consistent with the recorded sudden drop of 120,000 in the registered Syrian refugee population reported by DGMM at the end of 2019, one year after the end of verification[123]. These cases sometimes have 98-series registrations from the former registration system, but they are effectively treated as unregistered and are allowed to re-register to obtain a 99-series registration when they present themselves to PDMM[124] (confirmed by Commission internal reports that recorded 19,307 reactivations of this type)[125]. The second group, facing greater challenges, are typically refugees who returned to Syria, voluntarily or involuntarily, and whose files were de-registered as they left the country ('V87 cases'). According to DRC internal analysis of registration

[117] KIIs.
[118] KIIs.
[119] KII. This is, however, thought to be unlikely. Despite public perceptions, Syrians are very little involved in crime: in 2018 they were involved in 1.46% of crimes, down from 1.53 % in the previous year (Syrians represent a maximum of 5% of the population of Turkey). https://www.aa.com.tr/tr/turkiye/suriyelilerin-karistigi-suc-orani-yuzde-1–46ya-dustu/1289461
[120] KIIs.
[121] KII. However, research on SAWs showed that even in 2016, 88% of them were registered, although 40% of them were also out-of-province. Development Workshop. (2016). *Fertile Lands Bitter Lives, The Situation Analysis Report on Syrian seasonal agricultural workers in the Adana Plain*, Ankara.
[122] Note that unregistered Syrians are rarely whole families. CVME data and interviews confirm that most of the unregistered Syrian refugees are individuals living with a family, but who for some reason did not or cannot register.
[123] Attributed to an adjustment after verification by Murat Erdogan. (2020), *10th Anniversary of Syrian refugees in Turkey,* Ankara.
[124] KIIs.
[125] After an initial round of de-activations in 2018, UNHCR held meetings with DGMM and assisted PDMMs to reactivate the deactivated refugees. In close collaboration with DGMM, UNHCR deployed 45 staff to reopen verification centres in Ankara, Osmaniye, Malatya, Kocaeli, Kahramanmaras, and Konya, to support the PDMMs in the re-activation of files.

difficulties, in January 2019 de-registration[126] after return to Syria was the major reason for Syrians not being registered. This was generally confirmed by interviews[127], and UTBA also reported that many of their legal aid cases are attempts to seek re-registration after returning to Turkey from Syria[128]. While Syrians theoretically have the possibility to reapply for temporary protection status[129], interviews stated that this circular is not strongly enforced, and compliance is low, in part because PDMMs are now under pressure from governors not to increase the Syrian refugee numbers[130].

Fourth, the interview data on referrals to DGMM[131] suggests that the number of referrals for new registration have greatly reduced, and that most referrals are now for resolution of problem files.

Fifth, we know from Istanbul evidence that about 100,000 Syrians had their registration files updated at the moment of their removal from Istanbul, of whom about 65,000 were new registrations.

In sum, there are five factors that support the argument that by mid-2020 most Syrians are registered with the substantial contribution of the Facility: (i) increased number with *nüfus*; (ii) increased sense of security and integration; (iii) very high levels of awareness of the registration process; (iv) reduced number of referrals for regular registration; and (v) known number of Syrians registered through a special initiative after the Istanbul policy decision. At the same time there are considerable incentives for Syrians to register (in terms of access to services and reduced risks of apprehension) and few disadvantages.

This combination of factors and incentives leads the evaluation team to conclude that registration is no longer the major protection challenge for Syrians in Turkey. As discussed below, it seems that, for Syrians, being out of province is now a bigger problem than not being registered.

b. Out-of-province refugees

Three different datasets provide compelling evidence that a large number of refugees are outside their province of registration. This has dramatic implications for both protection (out-of-province refugees run the risk of apprehension and have limited access to services) and assistance (government and non-government agencies need to know where the refugees are to plan their service delivery).

The DGMM verification data that has been shared with the evaluation team, but that the team has agreed not to make public, shows that there were wide variations across the country with respect to how many more or less refugees were verified as compared to registered. Significantly more Syrians were verified than originally registered in Ankara, Konya, Kocaeli, Adana, Istanbul and Osmaniye, and significantly fewer in Hatay, Kilis, Mardin, Bursa, Batman, Diyarbakir and Şanliurfa. It is assumed that the DGMM data available online as of the end of 2018 reflected the updated demographic data after verification.

A second dataset is Ministry of National Education (MoNE) enrolment. While the distribution of refugee children might not be even across Turkey (e.g. in some provinces there is a working adult while the family remains living elsewhere), it is a reasonable proxy for the population distribution. Analysis of MoNE data from January 2019 suggests that DGMM data significantly (15–30%) overestimated the size of the refugee populations in Şirnak, Muğla, Mardin, Mersin and Şanlıurfa; while significantly (15–30%) underestimating the refugee populations in Kayseri, Kahramanmaraş, Ankara, Konya and Gaziantep. Extrapolating from partial MoNE data on Syrians in government schools, the evaluation team also estimates that there were at that time 125,000 out-of-province refugees spread between Sakarya, Samsun, Antalya, Çorum, Eskişehir and Yalova provinces.

[126] The evaluation team was not given an opportunity to clarify this with DGMM, but understands that de-registration is a DGMM administrative procedure to change the file status in the refugee database when DGMM determines that a refugee is not in country or no longer eligible for protection status (for example if a refugee is a no-show for verification, or upon formally exiting Turkey). In addition to registration numbers, some refugees also have additional codes attached to their electronic files, with V87 denoting a 'Voluntary returned foreigner'.
[127] KIIs.
[128] KII.
[129] The 7 January 2019 circular (TPR Circular 2019/1) requires PDMMs to consider special circumstances and vulnerabilities before refusing to re-register refugees returned from Syria.
[130] KII.
[131] The limited quantitative data does not provide details of the types of referrals to DGMM, for example for regularisation of transfers, registration of births, re-registrations or new registrations.

The dataset with the most detail, although not all provinces are covered (and some key provinces such as Adana, Ankara, Mardin, Kayseri, Kilis and Hatay have not yet been covered) is the IOM baseline assessment series. For many Turkish provinces IOM found that there was little variation between the number of refugees and migrants registered by DGMM, and those reported by local authorities. However, significant greater numbers than registered were found to be present in Istanbul (640,000 about half of whom were Syrians)[132] and Bursa (49,000 all Syrians). At the same time, several provinces were found to have fewer refugees than anticipated: Edirne (49,000 less of which 11,000 Syrians), Gaziantep (76,000 less, all Syrians), Izmir (20,000 less, but 100,000 less Syrians, therefore 80,000 more of other nationalities), Mersin (56,000 less, all Syrians) and Şanliurfa (241,000 less, all Syrians).

The refugee perspective:

'Let me share a problem that I have faced. I was living in Gaziantep and I wanted to move to Urfa. I wanted to transfer my ID file from Gaziantep to Urfa. In the beginning, I was told that I need a document from *mukhtar* where I am currently living in Urfa – the *mukhtar* told me that he cannot give me this document and referred me to *Nüfus* . I visited Urfa's *Nüfus* and was told that I must have IDs registered in Urfa to get this document. I even tried to explain the situation to the director of the *Nüfus* in Urfa, but he insisted that my ID needs to be registered in Urfa first (which is correct). I went to Urfa's PDMM to work on registering my ID, they told me that I need a "Transfer document" from Gaziantep's PDMM. Gaziantep's PDMM told me that I need to have a document from the *mukhtar* in the neighbourhood where I live in Urfa to give me this transfer document. It became a vicious circle. This continued for a year without being solved until brokers offered to provide me with a fake address in Urfa to give to Gaziantep's PDMM, then get the transfer document accordingly and the problem would be solved. This costs for TRY 300. I do not feel comfortable following illegal methods, I was afraid to do that.

The solution was quite simple, and I found out about it through a Facebook group, I had to transfer the water bill to my name, submit it to the PDMM and they would update the information accordingly. No entity of all that I visited could help me with that, people who commented on a post I shared on one of the groups were the ones who helped me.

When this problem occurred, I tried asking a community centre for help (opened in partnership with Urfa's municipality), I asked for their help, there were lawyers and translators. The lawyer contacted people who could help or be consulted in this matter and still she could not help me or solve the problem, she tried a lot but could not find a solution, she told me that the only solution is to go back and relocate in Gaziantep.'

- Interview with the evaluation team following the online survey

The data on non-Syrians is much less reliable, mainly because the government does not publish the baseline information on how many and where the non-Syrian refugees are[133]. Interview evidence suggests that, since registration was taken over by DGMM and decentralised to all PDMMs across the country, many non-Syrians choose to register in small satellite cities where registration is easier and quicker, and then move to where they can find work – usually returning to their province of registration every few weeks to fulfil their signing responsibilities[134].

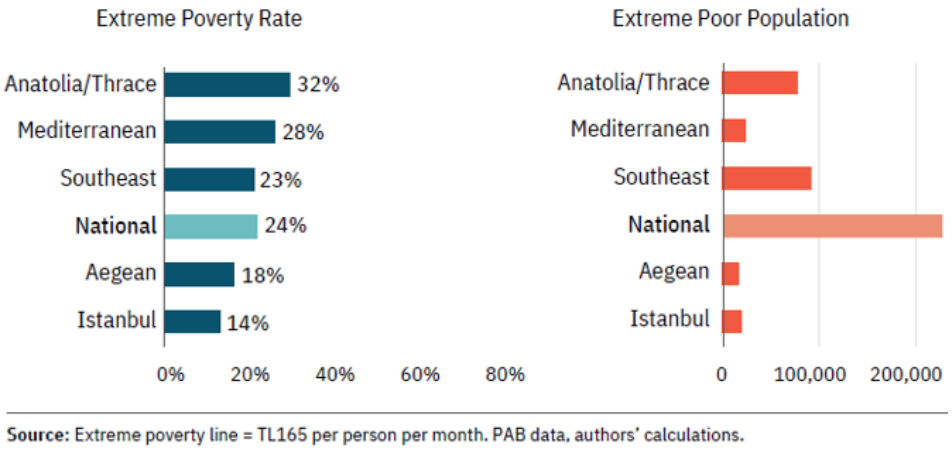
The big picture that emerges from these three sources is that Syrians have moved in significant numbers from the border provinces of south-eastern Anatolia to the agricultural and industrial provinces of the Mediterranean region, central Anatolia and especially Marmara. And even after the removals of late 2019, there could still be around 500,000 refugees and migrants in Istanbul, half of them Syrians, without being registered as residents there.

Why are refugees so attracted to Istanbul? The consensus of interviewees[135] was that the primary attraction is employment, and secondarily the possibility in such a mega-city to become anonymous – to stay below the radar of the authorities. The economic attraction is supported by data from WFP (see Figure 11)[136] and other sources[137].

[132] Note this assessment was carried out before the July 2019 Istanbul policy decision to remove unregistered refugees and migrants, as a result of which about 150,000 people were removed from Istanbul.
[133] It should be noted, however, that the IOM DTM data does cover non-Syrians in as much depth as Syrians.
[134] KIIs.
[135] KIIs.
[136] Cuevas, P. Facundo, O. Kaan Inan, Aysha Twose, and Çiğdem Çelik. 2019. Vulnerability and Protection of Refugees in Turkey: Findings from the Rollout of the Largest Humanitarian Cash Assistance Program in the World. World Bank and World Food Programme
[137] Other sources confirm this, for example: 'Survey results show that the primary rationale behind moving to Istanbul is to find a job (54.8%). The second most expressed reason is to follow the existing social networks such as family ties, relational links and other relevant social, ethno-cultural and religious networks.' Ayhan Kaya and Aysu Kıraç. (2016). *Vulnerability Assessment of Syrian Refugees in Istanbul*. Support to Life, Istanbul.

Refugees who are not registered in Istanbul are not necessarily trying to conceal their presence. Many of them would like to register but are afraid to approach PDMM for fear of being removed from the city[138] – for them, the benefits of having a job are greater than the combined risks of being unregistered and not having access to other forms of assistance.

Figure 11 Extreme poverty rate and number of poor among ESSN refugees (data and graphic from WFP/World Bank report *Vulnerability and Protection of Refugees in Turkey)*



Source: Extreme poverty line = TL165 per person per month. PAB data, authors' calculations.

The evaluation team conducted its own online survey that included questions probing the characteristics of out-of-province refugees. Using a random sample of survey respondents (n=78) the team's survey confirmed the general picture: 6% of refugees were out of province, the younger the respondent the more likely he or she was to be out of province (12% out of province in the 16–25 age bracket), and a larger proportion of survey respondents were out of province in Istanbul (13%) compared the rest of Turkey (5%)[139].

There have been signs of social tension, particularly in Istanbul in the period running up to the June 2019 removals[140], although the nature and intensity of social tensions varied between sub-provinces according to very local factors[141]. There was also strong evidence[142] that prior to mid-2019, refugees would move locally within Istanbul to find places where there was more social cohesion between the refugees and the host population[143].

Prof. Erdogan makes a compelling argument for refugees to continue to be allowed to work informally, and for the government to manage this better, for the benefits of refugee welfare and social cohesion, by allowing refugees to regularise their inter-provincial moves for the purposes of employment. His argument is complex but the evaluation team finds it to be coherent and persuasive. On the basis of this Syria Barometer evidence, he argues first of all that most Syrians will stay in Turkey, and that social assistance will never be enough to sustain 3.5m Syrians at a level where they can meet their basic needs, so they need to work. He then argues that Syrian informal labour is not substantially displacing Turkish informal labour, but it is adding net value to the Turkish economy. However, he also agrees with many critics that the economy (especially after the economic downturn compounded by COVID-19) could not sustain a large number of refugees entering the formal economy – and concludes that Syrian refugees being able to work informally is essential for their survival, good for the Turkish economy, and a positive force for social cohesion[144]. The final piece of this puzzle is that, for this to succeed as a long-term strategy for refugee well-being and social cohesion in Turkey, refugees have to be able to move to where the jobs are: 'there was no advance planning in the beginning of the process concerning Syrians and they were told to remain in their cities of registration after the registrations were completed. This has created significant differences in terms of number of Syrian residents among cities, districts and even neighbourhoods. Moreover, due to the largeness of the number, mobility could not be prevented. 3.6m Syrians have complex networks of relationships which may facilitate mobility, for instance, one

[138] KIIs.
[139] Evaluation team online survey data.
[140] KIIs.
[141] KII.
[142] (2019) Baseline Assessment in Istanbul – Field Observation Report, IOM, Ankara.
[143] Istanbul sub-provinces are made up of distinct ethnicities and Turkish citizens coming from different parts of the country, as a result of which there is a unique ethnic, economic and migrant density profile to each sub-province, which in turn seems to pattern whether sub-provinces are more or less accepting towards refugees of different nationalities.
[144] Prof. Erdogan does not advocate informal labour as a long-term solution: 'informality is not sustainable, recommendable – even for the short-term – or even an acceptable situation, either concerning the Turkish citizens or foreigners such as Syrians. In addition, it is structural problem against which the Turkish state has been fighting. However, it is a fact that informality has been important in keeping a high level of social acceptance and played a crisis-preventing role in Turkey in the short-term through letting Syrians have access to paid work while limiting the level of job loss because of Syrians to a minimum.'

can move to another city for work or for university education. The existing experience has shown both that applying such travel restrictions are difficult to implement and it is not clear why they are necessary. It is very clear that there is a need to reform travel restrictions of Syrians.'[145] In essence, Prof. Erdogan's concluding argument is that refugee migration to where they can work is an unstoppable economic force, and that the government should work with that force and manage it, rather than oppose it.

c. A secondary problem: registering a change of address within the same province

Although in protection terms not having an up-to-date *nüfus* is not as serious as being out of province, interviews with refugees conducted by the evaluation team following the online survey revealed a tremendous amount of refugee frustration and energy spent on changing addresses within the same town, or correcting names or addresses that had been recorded incorrectly by PDMM or other agencies. Refugees do need to move: their accommodations change according to their evolving family circumstances and budgets, and yet as soon as they are no longer at their registered address, they run the risk of being cut off from ESSN, CCTE and access to education until the problem is solved.

The refugee perspective:

'We are the 'Alloush' family, our neighbours are the 'Alloutt' family. My neighbours moved out and the similarity in the last name caused a huge problem, a mistake was made regarding the registration of my home address. Due to this mistake, my Kizilay Kart was stopped, my family's IDs were inactive for over a year, which affected school registrations and accessing healthcare services. I first realised that there was a problem when my [ESSN] was stopped due to a change of address, then we could not register the children in school. I went to the PDMM to ask what the problem was, they would tell me that the system shows no problem, but it appears that I have no registered address. After many visits to PDMM, they suggested visiting the police station and see the officer responsible for my neighbourhood. I went to the police station many times, but the officer was on leave. After many visits, I shared my problem with him, he told me that he conducted many visits and found no one living in the address, later we realised that there was a confusion regarding last names (ours and our neighbours). After the problem became clear, the police officer went to the PDMM with me corrected the mistake.

I tried everything I can to solve this problem, I went to PDMM, [NGO organisation], the school, and the *mukhtar*, they all would tell me that we have no registered address but they would not suggest any solutions.

My mother was living with me, she was ill (she has epilepsy) and was taking medications at that time. Her medication was also stopped because she was living with me and our IDs were not active at that time.'

- Interview with the evaluation team following the online survey

d. The contribution of the Facility to regularising the registration of out-of-province refugees

In conclusion, ever since movement restrictions for Syrians were introduced in Turkey in 2015, the Commission and humanitarian agencies have known that refugees are at greater protection risk when they are out of province, even if they are registered. This was a major factor underlying the verification programme of DGMM supported by the Commission through UNHCR, and facilitating regularisation of registration has from the start been a core protection activity of community centres and of the protection components built into the ESSN and CCTE programmes. There is no reliable data on regularisation of out-of-province refugees because DGMM will not share this data, but it seems likely that regularisation of inter-provincial moves remains permitted in the south-eastern regions, and that the 'hotspots' where out-of-province refugees have encountered the most difficulties were originally Istanbul, and more recently Bursa. DGMM confirmed to the Evaluation Team that the other 13 provinces that have decided to limit Syrian refugee registrations (see earlier discussion) also restrict the regularisation of refugee movements unless they meet the exception criteria. If Prof. Erdogan is correct in his analysis that Syrians must and will move to where they can find work in order to survive in Turkey, even if this takes them to provinces where they are not registered, then the unwillingness to regularise refugee transfers to those 15 provinces would seem to be the single most important systemic protection risk facing Syrians in Turkey today. This is not a risk area to which the Facility is currently contributing enough effort.

[145] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.

iv. Other factors causing a reduction in the number or registered and unregistered refugees

As stated by Franck Düvell in his 2019 article: 'The issues of Syrian refugees and refugee statistics are sensitive and politicised … In this light all numbers disseminated by Turkish sources or international organisations so far seem flawed or even grossly misleading. Apart from the administrative challenges in monitoring highly mobile populations, Turkey has its own national and international interests for claiming supposedly higher numbers.'[146] There are six other trends at play in Turkey and that affect the number of registered refugees. These are all independent of the Facility, but they are important modifiers of the total refugee population, and they do matter because a variation in the refugee population of as many as 500,000 or 1,000,000 refugees would have a massive impact upon policies and programmes affecting their protection.

a. Citizenship

Data on citizenship is not provided by the government officially, but a number of media reports of statements made by Turkish officials provide some indications. The number of Syrians offered Turkish citizenship was reported by DGMM as 30,000 by the end of 2017, and another report states 110,000 by the end of 2019[147], and 120,000 by mid-2020[148]. These numbers include the families of individuals granted citizenship by virtue of qualifying due to their education and profession, and might include some children born of mixed marriages[149]. In terms of social cohesion, it is worth noting that Turkish public opinion about Syrians receiving citizenship is firmly negative (76%)[150].

b. Irregular departures from Turkey

In the period 2015–2019, there were 1,249,875 irregular border crossings from Turkey to Europe (land and sea borders, see Figure 12)[151], of which 300,171 were Afghans, 141,322 were Iraqis, and 630,830 were Syrians[152]. According to UNHCR data 18% of the Pakistani crossing had a probability of being returned to Turkey, but other nationalities had a >1% probability of being returned to Turkey, and DGMM reports on its website that 2,139 irregular migrants had been returned to Turkey under the scope of the EU–Turkey Agreement[153]. Not all of these persons would have been registered as refugees in Turkey, but it is reasonable to assume that at least most of the Syrians were previously registered in Turkey.

Figure 12 Irregular movements to Europe from Turkey (land and sea borders) (Frontex)

	2015	2016	2017	2018	2019	2015-2019
Afghans	213635	43120	3985	10738	28693	300171
Cameroonians	888	375	648	1672	2073	5656
DR Congo	756	358	78	1695	3055	5942
Iranians	23062	5516	938	933	2290	32739
Iraqis	92721	27978	7202	8970	4451	141322
Nigerians	704	194	113	159	440	1610
Pakistanis	24203	9575	2600	2414	2007	40799
Palestinians	6367	2041	900	2011	3403	14722
Somalia	4538	666	384	1060	2849	9497
Syrians	496340	84585	16395	13906	19604	630830
Other	22172	7869	9076	13002	14468	66587

c. Resettlement

UNHCR resettlement data[154] shows that in the 4-years 2016–2019, 50,028 refugees were resettled from Turkey, just over half of them to Europe[155].

[146] (2019), Are there really 3.6 million refugees in Turkey or could there be considerably fewer?, Dezim Institut, Frank Düvell
[147] (2020), 10th Anniversary of Syrian refugees in Turkey, Murat Erdogan, Ankara.
[148] Direct communication with the author of the study cited below.
[149] The criteria for citizenship are quite general and generous, but Syrians do not apply, they are invited by DGMM based upon their profile.
[150] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.
[151] Frontex https://frontex.Europa.eu/along-eu-borders/migratory-map/
[152] The consensus of academics is that most of the educated and mobile Europe-oriented Syrians were in the first wave of movement to Turkey and have left Turkey in the 2014–2015 period. The vast majority of the Syrians currently in Turkey intend to stay there, and although the expressed intentions of Syrians to leave for Turkey have increased a little in the last two years (IOM data) it is felt that the financial cost of paying for the travel is prohibitive given prevailing poverty among Syrians in Turkey (Düvell). In sum, although some Syrians might wish to move to Europe, they are unlikely to act on that wish, and as time goes on will become more and more settled in Turkey (Erdogan). As evidenced by the Frontex data, movement to Europe is now mainly by non-Syrians.
[153] https://en.goc.gov.tr/return-statistics
[154] https://www.unhcr.org/resettlement-data.html
[155] DGMM data reported by IOM.

d. Return to Syria

Setting aside the thorny question of voluntariness[156], UNHCR reports that they observed the voluntary return interviews of over 34,000 Syrian families in 2019[157], and elsewhere they have reported that 62,439 refugees returned voluntarily to Syria between 2016 and 2019[158]. DGMM is reported to have given a much larger number, 315,000[159]–371,000[160]. Despite the government's expressed optimism that as many as a million Syrian refugees would want to return to a 'safe zone,' the measured preference of Syrian refugees is much less positive. The voluntary repatriation intentions of Syrians have changed dramatically in the last 2 years, between the Syria Barometer 2017 (16% do not plan to return to Syria under any circumstances) and Syria Barometer 2019 (52% would not return)[161]. Prof. Erdogan's conclusion is that 'the vast majority of the Syrians living in Turkey, even more than 80%, will not return and will live in Turkey permanently.'[162]

e. Removals from Turkey

The evaluation team has not yet found a reliable estimate of removals from Turkey (to Syria or any other country). It is definitely not as many as recorded by DGMM as apprehended (see Figure 12 above)[163].

f. Residence permits

The number of refugees who have been provided with residence permits is a difficult number to pin down, in part because there are several types of residence permits, including humanitarian residence permits that have been recorded as being offered to Afghans in lieu of refugee registration. Available data is that there are 141,818 Iraqis with residence permits, 117,579 Syrians, 67,164 Iranians, and 46,433 Afghans[164].

g. Newborns

Finally, a very important plus variable in the population equation is the number of newborns among the refugee population. The Ministry of Health reported 416,000 refugee births 2011–2018 and 110,000 in 2019 = 526,000. Similar data (550,000) is provided by Syria Barometer.

3.1.4. Contribution considerations

In conclusion, the contribution story regarding registration is that the Government of Turkey provided the foundational pre-requisites by passing the legislation and building the institutional framework for registration (supplying registration services), and providing powerful policy incentives (demand) for registration by making health care and education accessible to registered refugees.

The contribution of the Facility was to strengthen the performance of the government system (through UNHCR), to add further registration incentives by creating EU-funded programmes contingent upon registration (notably ESSN and to a lesser extent CCTE), to investigate registration gaps through protection monitoring, and to facilitate the process of registration by supporting a wide range of NGO partners to identify and support refugees to register.

Registration of Syrians was largely successful, and the Facility made a substantial contribution to that in the ways described above. However, registration of non-Syrians has not been so successful, and indeed has emerged as a significant and growing problem since 2018. The Facility has partly addressed this key protection gap through its projects with UNHCR and ASAM. However, the ASAM project has now finished and, because of the Syrian bias of the bulk of the Facility protection

[156] Refugees International, (2019), Insecure Future: deportation and lack of legal work for refugees in Turkey, Izza Leghtas; (2019). Sent to a war zone: Turkey's illegal deportations of Syrian refugees: Amnesty International.
[157] https://reporting.unhcr.org/sites/default/files/UNHCR%20Turkey%202019%20Operational%20Highlights.pdf
[158] Murat Erdogan. (2020), *10th Anniversary of Syrian refugees in Turkey*, Ankara: precise dates are not provided.
[159] (2019). Sent to a war zone: Turkey's illegal deportations of Syrian refugees: Amnesty International.
[160] Statement by President Erdogan at the Global Refugee Forum in December 2019.
[161] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.
[162] Konrad Adenauer Stiftung (2019), *Syrian Refugees in Turkey*, Murat Erdogan.
[163] KII.
[164] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.

programming, there would seem to be a critical gap in support for registration facilitation and protection services to non-Syrians nationwide (including in satellite cities).

The second protection area where the Facility's contribution has been limited, is in the regularisation of inter-provincial transfers, particularly the large number of Syrians moving to provinces where they can find work. The problem here is not so much technical – as DGMM seems to have the capacity to regularise these cases, as demonstrated through the verification exercise – but political will. Political will on the part of DGMM but especially on the part of local authorities, some of whom (for various reasons) are reluctant to allow refugee registration regularisations. The action suggested in this respect could be programmatic, but it is likely that two non-programmatic activities would achieve better results in this matter: support for further research (especially research into the economic value of informal refugee labour), and advocacy. Perhaps there is not sufficient policy space for completely opening up free movement of refugees nationwide as Prof. Erdogan has suggested; but there might be the policy space to allow individual Syrians with meaningful employment to be permitted to register their own personal moves to their province of employment (thereby granting them the full protections and service access of the Turkish state), while their families remain resident in other provinces that are more conducive in terms of social cohesion. Some sort of half-way measure such as this might go a long way to relieving the population and service pressures from some provinces, while still meeting the economic and humanitarian needs of the refugee population.

3.2. **Judgement criterion 11.2:** The Facility has contributed to raising refugees' awareness of their rights and obligations

3.2.1. 'Awareness of rights' as an outcome (qualitative and quantitative achievements related to awareness of rights)

If registration is a pre-requisite for access to rights and services in Turkey, then awareness of rights and obligations is the essential bridge to obtaining that access, and is a key component of the protection chain. Simply put, it is possible for a refugee in Turkey to be registered and to not know what registration does – and does not – provide.

The original humanitarian Management Framework encapsulated the Commission's humanitarian thinking at the outset of the Facility. It described in some detail an approach called OICR – Outreach, Intake, Case Management and Referral – and saw this linked set of protection activities as the keystone unlocking refugee access to other services (see Figure 13). Within this overall approach, awareness and information were key components of the logic. Refugee awareness of their rights and obligations was a specific result of the Framework, and of the theory of change: '*Logic and assumptions: (a)* Refugee awareness of rights and obligations leads to greater demand for services. (b) Awareness and understanding of refugee needs leads to appropriate referrals to relevant assistance.'[165]

Figure 13 DG ECHO concept of the centrality of protection (Management Framework)

In the discussion below, and following the practice employed by the protection community in Turkey, awareness of 'rights and obligations' is interpreted to mean (i) awareness of rights (e.g. the right to education, the right to health care, the absence of the right to vote etc.); (ii) awareness of obligations (e.g. the obligation to obey national laws, the obligation to send children to school until they finish secondary school, the obligation to remain in the province of registration etc.); and (iii) awareness of available services (awareness of support programmes such as ESSN and CCTE, awareness of community centres, awareness of legal aid etc.). In keeping with the OICR logic, awareness-raising and counselling (through whatever medium: internet, telephone or in-person) typically combines in a 'one-stop-shop' approach a combination of awareness-raising and referrals, and often also involves assistance (through

[165] ECHO. (2017). Turkey Management Framework 2016–2018.

case management and individual protection assistance (CM/IPA), see Section 3.2.3 below) to facilitate the completion of the cycle from intake to referral.

i. Measurable data of awareness outcomes achieved

The data on awareness is mixed. There is relatively good output data on the number of people attending information sessions and receiving individual counselling, as these were established early on as humanitarian partner reporting indicators by the Commission. There is some data on the number of people receiving online and hotline services, but this not comprehensive since this is not reported systematically to the Facility. There is no outcome-level data on the level or the change in the level of refugee awareness of their rights and obligations. Change in awareness is not easy to assess, but it is important to try, as this would be the main way of determining whether the significant effort invested in information and awareness-raising was successful. One method that provides partial data, is to conduct exit 'satisfaction' surveys after information sessions in order to make a quick assessment of whether session participants thought they had learned something new. Many NGOs conducted on-the-spot surveys of this type[166], and generally the results were positive[167], but this does not properly assess a change in awareness.

Mindful of this gap, the Commission originally intended that the humanitarian Monitoring and Evaluation (M&E) unit (or a third-party contractor) would conduct a number of phone surveys and household surveys to assess this change. For various reasons, but mainly the constrained operating environment and the difficulty to obtain permission to conduct surveys (see above), this independent assessment never took place. Measuring awareness remains an as-yet unfulfilled objective of the Facility. In mid-2020 the Commission re-proposed to collect data on the outcome indicator 'Percentage of refugees who are aware of their rights and obligations relating to accessing protection and social services' by conducting a Facility Annual Beneficiary Survey.

To help address this data gap, the evaluation team determined from UNHCR that there was no existing methodology in the Turkish context for assessing change in awareness, and set about making its own assessment. In consultation with several Facility stakeholders, the team came to the conclusion that the most reliable way to assess level of awareness is to administer a quiz to test refugee awareness of a range of issues that the awareness-raising community in Turkey encounters most frequently. With assistance from members of the recently created Legal Counsellors Group, a sub-group of the Protection Working Group, the team developed a 14-question quiz, where each question has one correct and two incorrect answers, and then validated the questions and answers with a range of experts. The quiz was presented as an optional add-on to the survey administered by the evaluation team, and received 137 replies (out of 292 completed survey responses). While the proportion of refugees opting for the protection quiz was encouraging (47%), the total number of survey responses was so low that the data gathered on level of awareness cannot be considered as a representative survey of all refugees in Turkey. Nevertheless, the data is presented below (with these limitations), and the evaluation team hopes that the experiment with an online protection quiz can inform subsequent initiatives by the Facility to assess change in awareness.

ii. Other evidence that awareness outcomes were achieved

The strong qualitative evidence that nearly all Syrians in Turkey *who want to register* are registered (see above), and the very large number of applicants for ESSN, are further evidence that Syrian refugees are aware of how to access those two basic types of support. The comparatively lower levels of registration and access to services among Syrians living in remote locations and engaged in seasonal agricultural labour, and non-Syrians, suggest that awareness is less in these populations.

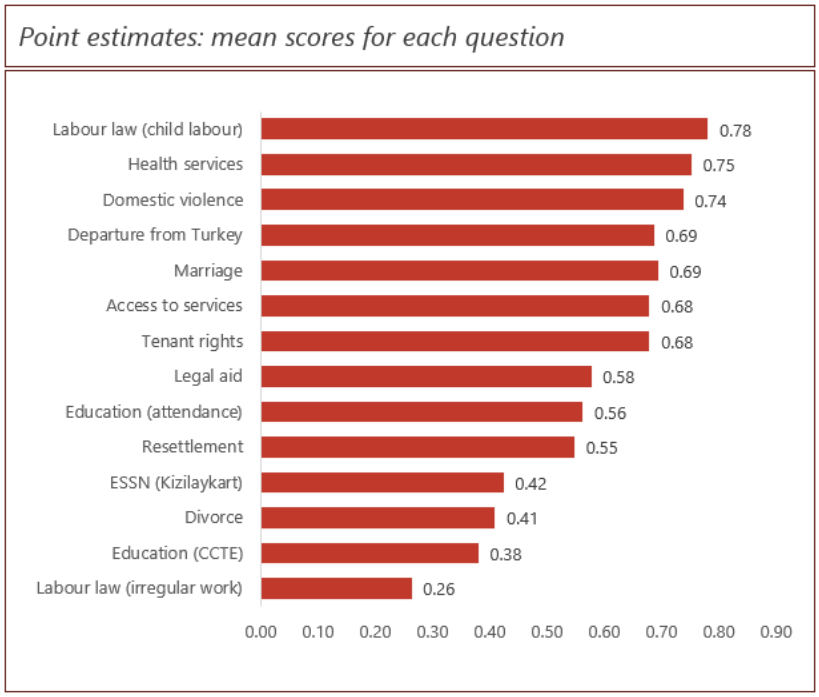
[166] KIIs.
[167] Review of Commission project reports.

Table 5 Summary of observed outcome: raising refugees' awareness

Expected outcome	The Facility has contributed to raising refugees' awareness of their rights and obligations
Observed outcome	Refugee awareness of their rights and obligations has grown considerably over the lifetime of the Facility. Interview data shows that Syrians living in provinces with large concentrations of Syrian refugees, and which have received targeted investment in information programmes, are no longer requesting basic information about rights and obligations, but are instead now seeking specific information relating to 'problem cases.' The level of refugee awareness seems to be lower among Syrians living in remote locations and engaged in seasonal agricultural labour, and non-Syrians.
Facility results contributing to the outcome	• Indicator 11.2.1: Number of refugees participating in group activities to provide information and raise awareness. • The data is complex and a detailed description is provided below. The team's best estimate is that 63,110 refugees in Turkey participated in in-person group or individual awareness-raising activities, or received information about their rights and obligations in Turkey (Table 6). Table 6 Awareness-raising for refugees **REFUGEES RECEIVING IN-PERSON AWARENESS AND LEGAL COUNSELLING** UN: 16,976 UN SYR: 15,472 (91.1) UN NON-SYR: 1,504 (8.9) TRC: 12,335 TRC SYR: 12,018 (97.4) TRC NON-SYR: 317 (2.6) NGO: 33,808 NGO SYR: 26,808 (79.9) NGO NON-SYR: 7,000 (20.1) **TOTAL: 63,110** TOTAL SYR: 54,298 (86%) TOTAL NON-SYR: 8,821 (14%) • Indicator 11.2.2: Level of refugee awareness of their rights and obligations • The evaluation team's analysis suggests[168] that refugee awareness of rights and obligations varies widely across the 14 topic areas (see Figure 14), but generally the surveyed population's awareness was average (mean of 8.2/14)

[168] The awareness quiz methodology yielded a good range of responses and interesting results, however the sample size was small (n=137), so this data needs to be treated with caution.

Figure 14 Legal awareness of refugees (evaluation team survey)



- Women are slightly more aware than men, younger refugees are slightly more aware than older refugees, and refugees in Istanbul have lower levels of awareness than refugees in the rest of Turkey.

iii. Data sources on awareness of rights and obligations

The quantitative datasets captured and analysed by the team are the humanitarian monitoring data on information sessions and legal counselling, Financial Tracking Service (FTS) data on the relative financial contributions of different donors, and the responses to the protection quiz administered as part of the evaluation team's online survey[169]. All of these datasets have their weaknesses. The data reported by humanitarian partners reveals that partners were not using consistent definitions and counting methodologies. For example, some partners record the number of participants reached during outreach community information sessions or through social media; some report participants in general information sessions within an office; others limit their reported data to participants in legal counselling sessions; while some partners recorded counselled individuals and others counted counselling events (which could have been the same individual multiple times). Furthermore, individual counselling is complex because several different types of support were often provided in a single session (information, counselling, individual assistance and referral – as indeed was intended with the OICR approach). Finally, some partners recorded large numbers of the host community as receiving (refugee) information and awareness-raising. In managing this data, the evaluation team had to make some judgement calls in order to derive a reasonable approximation and avoid distortion. The data presented in Table 6 above is therefore an aggregated estimate of data from several sources that did not all use

[169] In an attempt to assess the contribution of the Commission's humanitarian projects to the overall results of the humanitarian community, the evaluation team analysed in considerable detail the 3RP database for the same period 2017–2019 (which is similarly marked by a change in the indicators in the middle of this period – complicating the analysis). As of 2019, ActivityInfo uses 3 different indicators to assess awareness of rights and obligations, none of which align well with the Commission's humanitarian indicators, although in 2020 progress is being made by the Commission, via SUMAF, and UNHCR (as the keeper of ActivityInfo protection indicators) to bring those two sets of indicators closer together. ActivityInfo has three indicators: 1.1.1 # of individuals trained on international protection, rights, services and available assistance (this is an individual training indicator, more focused than participation in an information session), 1.4.2 # of individuals reached through information tools on civil documentation, rights and remedial mechanisms (this includes, leaflet distribution, posters, public figures (Imams/Mukhtars), information via websites), and 2.2.1 # of individuals reached through information campaigns and awareness-raising on rights, entitlements, services and assistance (the broadest category, including social media, leaflets, outreach teams, phone lines etc). The evaluation team found that the ActivityInfo data was not sufficiently comparable to the Commission's humanitarian data, and that usage of the donor-tagging function in ActivityInfo was not sufficiently disciplined, to allow a methodologically robust contribution calculation of this parameter.

consistent criteria. The financial data from FTS is similarly approximate, as not all donors and activities are consistently recorded in FTS. And finally, the sample of the evaluation team's survey responses was not nationally representative, although it did yield some general indications of which topics and geographic regions had greater or lesser awareness.

Qualitative data consists of administrative data in 45 protection-focused key informant interviews plus another 15 interviews where the protection team participated; approximately 40 project documents (from 25 humanitarian protection projects and two development projects implemented by EUTF Madad); occasional reports of implementing partners (e.g. the Communication with Communities survey conducted by UNHCR); and the interviews conducted by the evaluation team. There is little academic literature specifically on refugee awareness of their rights and obligations.

vi. Hypothesis on the Facility's contribution to the outcome

There is evidence that refugee awareness did increase substantially, to the extent that in mid-2020 most refugees in Turkey are aware of their rights and obligations (Syrians more than non-Syrians). Nevertheless, there are still gaps in awareness in some areas, and lower levels of awareness in Istanbul.

Refugees in Turkey receive information through many channels, including community networks and social media. However, the more reliable and accurate information – backed up by individual counselling when necessary – was provided by four main groups of actors, all of whom were substantially funded by the Facility. They were (i) government agencies, notably DGMM (PDMM protection desks) and MoFLSS (SSCs) providing information during outreach activities or at intake for services; (ii) UNHCR; (iii) international and national NGOs specialised in supporting refugees (this includes a number of NGOs directly contracted by the Commission, and also NGOs sub-contracted by UNHCR); and (iv) TRCS.

Several donors supported these four sets of actors, including the Government of Turkey (financing the core services of DGMM and MoFLSS).

So, the contribution hypothesis is that the most reliable information on rights and obligations was provided by these four sets of agencies, and that the Facility's contribution to this outcome was substantial, although probably no more than half of the total resources invested in this outcome.

3.2.2. Description of Facility interventions aimed at supporting awareness of rights and obligations

i. Community centres[170]

There are over 80 community centres spread across Turkey[171] providing building-based services to refugees. In this report we call them community centres, but in reality, they have a range of names and vary in size from four-person field offices (ASAM's configuration in many small cities) to multi-storey buildings with more than 15 staff, offering a full range of counselling services, psycho-social support, language classes, skills training, and child-friendly spaces (the typical TRCS community centre model), and everything in-between. What they all have in common, the lowest common denominator of service, is providing information to refugees on their rights and obligations, and on how to access basic services. Although this section discusses the information services provided by community centres, one should note that a community centre provides many other social and protection benefits: it is a safe social space and also opens up opportunities to seek other services. Community centres and social cohesion activities are especially important for women who might not have alternate social spaces or easy access to online services.

[170] The details of the Facility projects supporting community centres are provided in section 3.3.2 below.
[171] The number fluctuates constantly as centres open and close due to local factors and funding availability. TRCS has the best-established network of full-service community centres, 16 centres in 15 provinces (2 in Istanbul) where there are concentrations of Syrian refugees. ASAM has about 50 offices, six of which were supported by the EUTF Madad project, the remainder mainly supported by UNHCR. ASAM offices are smaller than TRCS community centres, but are present in the majority of satellite cities with non-Syrian refugees.

ii. Turkish Red Crescent Society

The centres whose protection activities are supported by the Commission's humanitarian assistance (including TRCS)[172] reported to the Commission quarterly[173] the numbers of refugees receiving information on their rights and obligations, although the Commission's humanitarian indicators have also changed during the Facility Tranche I period[174]. A separate database of TRCS activities was provided to the evaluation team (Table 7), divided between two reporting periods with slightly different indicators for each. These supplementary reports showed considerably more awareness-raising activities for refugees than reported by the humanitarian monitoring data (4.5 times more). A baseline/endline study by TRCS showed that men and women had different priorities for awareness-raising (with men more interested in employment issues)[175]. It also showed that a substantial proportion of community centre awareness-raising beneficiaries (40%) were from the host community – which the evaluation team considers to be beneficial for social cohesion. This discrepancy between the Commission's and TRCS reporting could reflect that the community centres were supported by several donors beyond the Commission. The evaluation team concluded from this analysis that TRCS community centres are providing quite good coverage of awareness-raising in their 15 focus provinces, but that it is not possible with methodological certainty to calculate how much of that awareness-raising was provided by Facility funding. Independent observers noted that the quality and contextual sensitivity of TRCS awareness-raising has improved significantly since the beginning (when sessions were rather formal, legalistic and less well adapted to their audience)[176].

Table 7 TRC data on participation in awareness-raising sessions

TRC awareness sessions before mid-2019			
	Refugee	Host	Total
Protection seminar	14,871	13,980	28,851
Legal seminar	22,621	17,922	40,543
Field outreach on rights	8,556	1,507	10,063
TRC awareness sessions since mid-2019			
Legal counselling	3,043	74	3,117
Legal seminar	14,472	9,961	24,433
Grand totals	63,563	43,444	107,007

iii. Association for Solidarity with Asylum Seekers and Migrants (ASAM)

ASAM data was derived from their project reports to the Commission. The project with ASAM also provided support for awareness-raising at two levels: the project conducted awareness-raising of refugee rights; and training for national and local government organisations (including DGMM) and media – 1,298 participants, not counted in Table 8. In addition, ASAM directly provided awareness-raising and counselling for refugees. The ASAM indicators are rather confusing but it seems that legal

[172] Most of the TRCS community centres receive core funding from the Madad project, but throughout the Facility Tranche I their protection activities were supported by additional targeted funding from the Commission's DG ECHO.
[173] Since late 2019, protection partners are reporting some activities to the Commission, via the Facility Results Framework, and also continue to report a few specialised protection indicators to the Commission's humanitarian M&E unit.
[174] The humanitarian monitoring data on participants in information sessions used in this report combines the old indicator 'Number of persons with increased/appropriate information on relevant rights' and the new indicator: 'Information: refugees participating in group activities to provide information and raise awareness,' and is updated to the end of Q4 2019, but also limited only to Facility Tranche I projects. This is a much smaller number than the 943,083 'individuals reached through information campaigns, participatory assessments, activities to raise public awareness on rights, entitlements, services and assistance' reported to the Commission's humanitarian M&E unit up to the end of Q3 2019, because that much larger number includes persons reached passively through calls to hotlines, social media, kiosk visits, and leaflet distribution etc.
[175] UDA Consulting. 2020. Responding to protection needs of refugees in Turkey – endline data collection and comparative analysis, TRC, Ankara.
[176] KIIs.

counselling[177] was provided as follows: 6,970 legal counselling participation by 4,170 refugees (1,902 female, 2,256 male, 12 other); (3,752 adults, 418 children); (2,063 Iraqi, 1,170 Afghan, 663 Iranian, 158 Syrian, 116 other nationalities). Taking the ASAM data at face value and adding it to the humanitarian data, it seems that (approximately) 7,000 non-Syrians participated in Facility-funded NGO information sessions (or counselling) regarding their rights and obligations.

The Commission's original humanitarian data is presented in Table 8. However, the data provided by UNFPA to the Commission on *host communities* reached through information sessions is problematic. MoFLSS did not agree to speak with the evaluation team to clarify this data, but it is assumed that it is not an accurate number of *refugees* participating in group awareness-raising activities[178]. Accordingly, the data has been adjusted in Table 9 to remove host community data on refugee awareness.

What this adjusted data shows (Table 9, which repeats Table 6 above) is that, in Facility I projects, NGOs conducted about half of all in-person awareness-raising/information sessions for refugees, followed by the UN agencies (UNHCR/PDMM and UNFPA/ PDFLSS/SSCs), and finally TRCS. Altogether 63,000 refugees were reached by the Commission's humanitarian programmes over 3 years, which represents about 2% of all refugees in Turkey, and that assumes no double-counting (to offset this, it can be assumed that at a household level more than one person has benefited from each person attending the awareness session). The data presented here is the best the team could derive from the Commission's humanitarian database, but because of ambiguities in the definition of indicators, inconsistent reporting by IPs and changed reporting parameters in mid-2019, this data is not very robust.

In any case, even if the Commission's monitoring reports significantly undercount the number of awareness session participants and they are more than reported in Table 9, and even if they reach an additional four family members per session participant, there is still no doubt that in-person awareness-raising sessions in community centres still only reach a small proportion (generously we could say 10%) of the refugee population.

Table 8 Unadjusted DG ECHO data on refugees receiving in-person awareness-raising and legal counselling funded by Facility Tranche I (up to Jan 2020)

TOTAL	**62,743**	**%**
TOTAL SYR	54,298	86.54033
TOTAL NON-SYR	1850	2.948536
TOTAL HOST	6592	10.50635
UN	23,568	
UN SYR	15,472	65.64834
UN NON-SYR	1504	6.381534
UN HOST	6592	27.97013
TRC	12,335	
TRC SYR	12,018	97.43008
TRC NON-SYR	317	2.569923
NGO	26,837	
NGO SYR	26,808	99.89194
NGO NON-SYR	29	0.10806

Table 9 Adjusted data on in-person awareness-raising and legal counselling funded by Facility Tranche I (up to Jan 2020)

UN	16,976	
UN SYR	15,472	91.1
UN NON-SYR	1,504	8.9
TRC	12,335	
TRC SYR	12,018	97.4
TRC NON-SYR	317	2.6
NGO	33,808	
NGO SYR	26,808	79.9
NGO NON-SYR	7,000	20.1
TOTAL	**63,110**	
TOTAL SYR	54,298	86%
TOTAL NON-SYR	8,821	14%

[177] The evaluation team feels this equates more closely to awareness-raising of rights and obligations than the alternate category of 'social counselling'

[178] Including the host community in programmes that raise awareness about refugee rights and obligations is in itself an important activity and is likely to enhance protection, but it should not be counted under the heading of *refugees* receiving awareness-raising support.

iv. Outreach activities

As discussed earlier, many NGOs also had outreach programmes, although from 2017 onwards most of these activities were no longer permitted, and outreach activity by everyone except government and TRCS was greatly reduced[179].

v. Government information providers

Two government agencies in particular played a role in raising refugee awareness of their rights and obligations: DGMM and MoFLSS, and both of these activities were substantially supported by the Facility. Under the two UNHCR projects with DGMM, a critical component was added onto the basic process of verification – a component that some observers think might have been the most important from a protection viewpoint[180] – notably the creation of 'Protection Desks' (these are discussed more fully in Section 3.3.2.). Protection Desks were essentially counselling services provided within the PDMM office, typically by a contracted social worker and/or psychologist. They were set up initially in all 32 provinces with a refugee population of more than 3,000[181], and later reduced to 26 provinces due to lack of demand. Details of the counselling remain confidential, but interviews with DGMM[182] confirm that common topics of counselling were out-of-school children, early marriage, and access to basic services (health, education) and programmes (ESSN and CCTE)[183].

The MoFLSS SSCs centres are assumed to have played a similar role, and they were supported by two different Facility projects: the project with UNFPA directly supported 27 SSCs (in particular paying for the salaries of 236 contract staff)[184], and the CCTE project with UNICEF (ECHO/TUR/BUD/2017/91007) also supported a number of Family Social Support Programme (ASDEP)[185] teams. The available data on the MoFLSS information sessions is somewhat problematic (see Section 3.3.2);

Table 10 Information sessions provided by MoFLSS SSCs

	Total # of beneficiaries	% women	% children & adolescents	% disabled	% of Syrians	% of host community	% of refugees (non-Syrians)
Child Marriage	8,213	75.2%	28.0%	0.8%	85.1%	13.6%	1.3%
Differences and richness of cultural norms	3,498	62.0%	56.6%	0.7%	85.6%	13.3%	1.0%
Everyday life in our city	5,190	63.5%	50.5%	1.1%	87.8%	11.5%	0.6%
Family education	6,445	76.4%	20.3%	0.8%	80.2%	18.6%	1.3%
GBV[144]	5,176	75.8%	27.4%	1.0%	80.4%	15.0%	4.6%
Gender Equality	3,242	72.5%	28.3%	0.6%	85.9%	12.5%	1.6%
I'm learning my rights	8,398	67.6%	43.3%	0.8%	76.5%	21.3%	2.2%
Other	51,062	63.0%	55.7%	0.8%	67.6%	30.0%	2.5%
Grand Total	**91,224**	**66.5%**	**46.7%**	**0.8%**	**74.1%**	**23.7%**	**2.2%**

[179] Operating permissions were initially limited by the then MoFSP on the grounds that government was to provide services, but then relaxed in 2018 and for most of 2019 to allow NGOs to negotiate operating permits on a provincial basis, and then restricted again from late 2019 – when the authorisation of permits was recentralized to the level of MoFLSS.
[180] KIIs.
[181] UNHCR Final Report Verification Exercise.
[182] KIIs.
[183] DGMM is also responsible for promoting social cohesion between refugees and the host community, and sometimes conducts outreach with a social cohesion (rather than a refugee awareness) objective: KII.
[184] For more detailed discussion of the UNFPA project to strengthen the SSCs see Section 3.3.2.
[185] These are outreach teams encompassed within the MoFLSS 'Family Social Support Programme.'

however, the data provided in Table 10 shows the range of topics covered by SSC information sessions (with a rather large 'other' category), that about one quarter of information session participants were from the host community, and that very few participants were disabled (0.8%) or non-Syrian (2.2%). The quality of the SSC awareness-raising work does not seem to have been assessed, and the recent UNFPA evaluation team was not able to interview SSC staff or beneficiaries[186].

TRCS also conducted important outreach work, both general outreach directly from the community centres, but also targeted to children at risk of dropping out of school as a component of the CCTE project. It can safely be assumed that most regular outreach to refugee families would have involved some measure of awareness-raising about rights, obligations and services.

vi. Legal services

Legal services hold a special place in the universe of awareness-raising because they involve various types of counselling and extend as far as obtaining legal resolution when refugees encounter obstacles to the achievement of their rights. Many NGOs provide some form of legal services, usually general counsellors without legal training although some have also qualified lawyers providing counselling[187]. TRCS uses a different model with outsourced legal contractors[188]. However, by law, only UTBA can provide free legal representation[189]. The recently formed Legal Counsellors Group[190] (a 33-member sub-group of the Protection Working Group) has developed a useful typology of the different types of legal services available to refugees, and has started to organise the different practitioners, to share information, and to seek some standardisation in practice. The five basic categories of legal service are (i) legal awareness (outreach work and community centre group awareness sessions supported by a trained legal counsellor); (ii) legal counselling (usually individual counselling to seek to understand and work towards resolving a specific legal case); (iii) legal referrals, i.e. preparing a case file and assisting a refugee to obtain a lawyer (by law only UTBA members can provide free legal representation); (iv) legal fee assistance (refugees might need to meet other costs associated with a court case, including translation costs, obtaining or notarising documents, transportation costs, court costs etc. – note that lawyer fees are covered by UTBA)[191]; and finally (v) legal assistance, which is actual representation in court.

The Facility has been instrumental in providing legal support at two levels. First of all, many Facility partners are providing legal awareness and legal counselling as part of their core counselling services[192]. Second, the Facility-funded project with UNHCR under Humanitarian Implementation Plan (HIP) 2017, and a successor project funded under the Facility Tranche II, both have significant components specifically to support UTBA. The 2017 project trained lawyers in 18 target provinces on the intricacies of refugee law in Turkey, established an automated system to track cases and match them to appropriate lawyers, and assisted 847 individual refugees[193]. The successor project (not covered in the scope of this evaluation) has reportedly established a number of UTBA legal clinics in provinces with large Syrian populations: one-stop-shops to provide the full range of legal support described above.

An important area of activity in the legal domain is not so much information for refugees, as information for the *legal community*. Refugee law and regulations are complex and change frequently, and they are not often taught in law school. UNHCR offers a 3-day workshop to cover the basics[194], but more technical understanding is needed to effectively represent refugees and to fairly judge their cases, and there is a frequent rotation of lawyers available to work on refugee matters[195]. Providing this outreach to the legal community is one of the activities of the Legal Counsellors Group, and might be as efficient and effective in terms of refugees accessing their rights as counselling and support for refugees themselves (this was not assessed by the evaluation team).

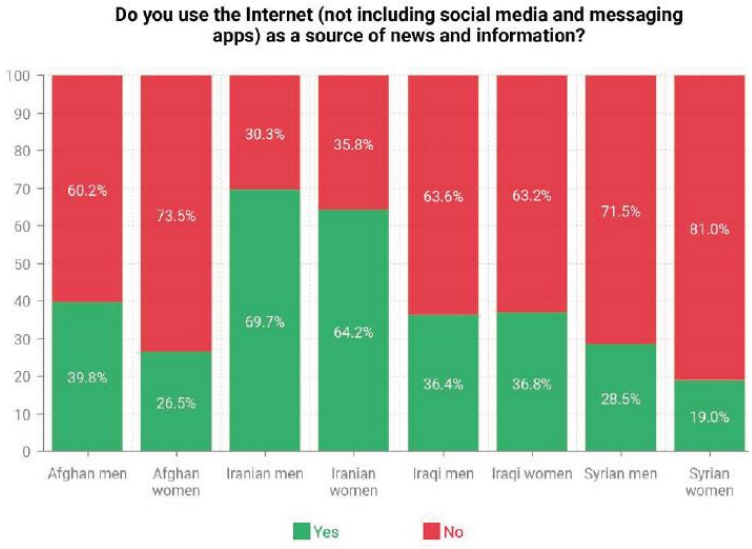
[186] KII.
[187] KII.
[188] KII.
[189] KIIs.
[190] South-East Turkey Legal Counsellors Group. (2019). *Framework for Action.*
[191] KIIs.
[192] Even though UTBA's role is unique and protected by law, legal counselling by NGOs is explicitly permitted in the LFIP.
[193] UNHCR. (2019). Final Report of project ECHO/TUR/BUD/2017/91005.
[194] According to UNHCR project reporting, 3,312 lawyers received training on legal services for refugees during the 2017 HIP project, an overachievement relative to the target of 500. The evaluation team sought more data on UTBA but UNHCR was not able to share UTBA referral data with the evaluation team: P17.
[195] KIIs.

One of the most significant observations made during interviews with actors in legal counselling is that the nature of refugees' legal problems has evolved considerably over the last 8 years. While initially refugees were encountering challenges with very basic problems of registration and documentation, as time goes on their problems and their needs have become more technical and sophisticated: they are now seeking more expert assistance with solving problems that they have tried to solve on their own already. Some refugees who come for legal counselling know exactly how to register their children in school, but they have not succeeded with a direct approach and are seeking more sophisticated ways to obtain access; others know all about registration but they have been de-registered and need strong push to get back into the system; and in other instances we heard that refugees are now finding themselves in legal disputes with landlords, with employers, with their spouses or they are entering into contracts and conducting property transactions – all examples of more 'advanced' problems with access to rights[196].

vii. Websites

The Government of Turkey, and most Facility partners, have websites that point the browsing public towards sources of further information, or that contain a portal with basic information about rights, obligations and services, often in Arabic and occasionally in Farsi[197].

Figure 15 Internet use by refugees in Turkey



A unique type of website was built by UNHCR with support from the Commission in the Facility Tranche I: called Services Advisor. This website contains an extensive geo-localised database of services that allow any website visitor to find details on services available to refugees in any location. UNHCR project reports show that this online service was visited 171,410 times during the project period – a number that the evaluation team interprets as substantial usage. Interestingly, there were two voice-over videos created by UNHCR, and these were viewed more often by Farsi speakers than by Arabic speakers, suggesting that Iranians were major users of the service, and possibly also Afghans (although Iranians were more likely users since they are vastly more frequent internet users). However, despite the presence of these web resources, UNHCR data (Figure 15)[198] shows that refugees generally do not use the internet as a source of news or information.

viii. Social media sites

The evaluation team assessed the information and awareness-raising content of the Facebook pages hosted by Facility partners, and found that the only Facebook pages that provide useful and accessible information on refugee rights and obligations were UNHCR (full and regularly updated information on all aspects of rights and obligations), and TRCS' ESSN Facebook page (for ESSN and CCTE). This UNHCR and TRCS information was available in English, Turkish, Arabic and Farsi. ASAM provided some information but not consistently, and DRC provided information about their own services. All other Facebook pages analysed were focused upon institutional promotion and fund-raising.

[196] KIIs.
[197] A good example is https://help.unhcr.org/Turkey/, which received 494,563 site visits according to UNHCR reporting. A high proportion of people accessing UNHCR's web-based HELP function did so in Farsi, suggesting either that this site was extensively used by Iranians (who are known to be much better educated and more likely to use websites – see Figure 15). It might also signal that the information needs of non-Syrians are greater, either because their legal situation and processes as IP status holders are more complex than for Syrians, and/or that there is less information available from other sources on the rights and obligations of non-Syrians.
[198] UNHCR. (2019). Survey on the information needs and communication channels used by refugees and asylum-seekers in Turkey, Ankara.

ix. Hotlines

Several organisations manage refugee information hotlines. Among the largest are DGMM (YIMER 157, operating 24/7 in six languages)[199], TRCS/ESSN (168 hotline), and UNHCR[200] which in mid-2019 took over the hotline previously managed by ASAM[201]. There are also local hotlines, for example Refugee Rights Turkey manages a hotline for detainees in Istanbul, and the International Refugee Rights Association (Istanbul), as well as Mülteci-Der (Izmir) have helplines. Many INGOs provide specialised telephone-based support, for example DRC provides interpreter support through the telephone (an average of 800 calls/month)[202], and CARE provides similar support from Gaziantep. In addition, many NGOs that were not providing an organised hotline resorted to ad hoc hotline-like service provision under COVID-19. The major hotlines of TRCS and ASAM were supported by the Facility, as well as the helplines of CARE and DRC.

While hotlines are effective and valued (see below), the evaluation team noted that hotline services are quite fragmented, with each hosting organisation providing advice related to its primary area of expertise. In this way, UNHCR's hotline specialises in answering questions about registration and especially resettlement, DGMM answers questions about registration and regularisation, TRCS specialises in ESSN and CCTE enquiries as well as TRCS service areas, UTBA specialises in legal matters, and NGOs provide perhaps some more general advice – as well as information on their own services. Even if most refugee information needs are covered, the system is a patchwork, and there does not seem to be a planned network or a deliberate division of labour[203].

x. A proposed smartphone app

There has been some discussion of the development of an app that would, presumably, provide refugees with answers to basic questions about their rights, obligations and services, and then guide them through information and decision pathways to obtain more precise information or a recommended course of action. UNHCR was contracted by the Facility to develop such an app as part of their 2017 HIP project, but the app development was not complete by the end of Q1 2020. Various interviewees doubted the value of such an app in the Turkey context – not because there is no demand (see analysis below) but rather because of the complexity of the Turkish system, the rapid changes in regulations, and the highly localised practices and procedures that together would make it almost impossible to develop an app that provides definitive answers to complex questions. Instead, most interviewees felt that the support of an informed human interlocutor (through a hotline or an in-person counselling session) is needed in order to provide appropriate advice to any but the most basic questions[204].

xi. The Facility's relative funding for raising refugee awareness of their rights and obligations

Earlier (Figure 4) we examined the proportion of funding to UNHCR provided by the Facility – homing in on UNHCR because it is the main agency supporting registration. Activities to raise refugee awareness of their rights and obligations are provided by a wider range of organisations, but the main donor alongside the Facility is still the USA. Using data from FTS[205], and considering organisations supported by the USA that are providing awareness-raising services (essentially all the protection actors with community centres and UNHCR), the evaluation team estimated that the USA provided approximately USD 150m for these protection partners over the Facility period. This is an amount somewhat smaller than the EUR 192 million provided to the same range of partners by the Facility Tranche I (see Section 3.1.1). While these calculations are estimates at best, they do suggest that the Facility was the largest donor to the direct awareness-raising activities of UNHCR, TRCS and NGOs.

[199] DGMM's Foreigners Communication Centre (Yabancı Iletisim Merkezi, YİMER) was contacted 490,630 times in 2019 (see AIDA (2020). *Country Report: Turkey*).
[200] The UNHCR Counselling Line answered 110,463 unique calls from 1 July to 31 December 2019, and employs 34 multilingual operators. UNHCR also has local call centres in Sanliurfa and Gaziantep. UNHCR. (2020), *Turkey 2019: Operational Highlights.* Ankara. UNHCR also provides 'gate counselling' which is essentially an in-person basic consultation at a UNHCR office – although this was reducing over time as the use of the hotline increased, and gate counselling stopped during COVID-19.
[201] KIIs. ASAM's final report noted that, just prior to closing its 'Counselling Line,' it was answering an average of 2,243 calls/month for 1,853 individuals/month, about half Syrian, followed by Iraqis, Afghans and Iranians.
[202] https://drc.ngo/media/5455434/drc-Turkey-factsheet-oct-2019.pdf
[203] KII.
[204] KIIs. For the same reason, UNHCR has been reluctant to make available online their compendium of FAQs used by their hotline workers – partly because they are not sure that there would be universal consensus on the 'correct' answers, but also because some measure of human judgement and analysis is always needed.
[205] The calculation used was to extract from FTS all USA contributions to Turkey 2016–2018, remove all agencies not directly providing protection services (i.e. WHO, IOM, ILO, UNICEF. WFP etc), remove commitments without corresponding payments, and divide multi-country projects (Turkey, Jordan, Lebanon, Iraq and Egypt) by a factor of 3.

3.2.3. Contextual analysis of Facility interventions (interaction with other government and non-government factors, mechanisms and processes put in place)

This section contains a contextualised analysis of how the support provided through the Facility has sought to improve refugee awareness of their rights and obligations. This begins with an examination of the activities of the Facility and the strengths of its approach, and what external factors favoured the achievement of awareness outcomes. Then the analysis considers opposing contextual factors that have made awareness-raising activities more difficult, including key constraints encountered by the Facility partners and partner efforts to overcome those constraints. Finally, the contextual analysis reflects on those external factors that have influenced refugee awareness of their rights and obligations in Turkey, independently of the EU's efforts.

i. Facility support for awareness-raising and additional contributing factors

The most important systematic research on how refugees become aware of their rights and obligations, and on their most trusted sources for such vital information, comes from an extensive survey conducted by UNHCR under the Facility-funded HIP 2017 project[206]. This research had the important quality of also analysing this data by gender and nationality of refugee (Afghan, Iranian, Iraqi and Syrian).

In Figure 16 it is clear that refugees get most of their information on their rights, obligations and services from friends and family, or online groups of refugees (e.g. WhatsApp or Telegram chat groups)[207]. UN agencies and NGOs are a distant third at 17%, and government even lower at 8.1%[208]. There was some variation by nationality, with Afghans placing UNHCR and NGOs second as a source after friends and family (consistent with the low internet and smartphone use by Afghans).

Figure 16 UNHCR survey data on how refugees in Turkey receive their information

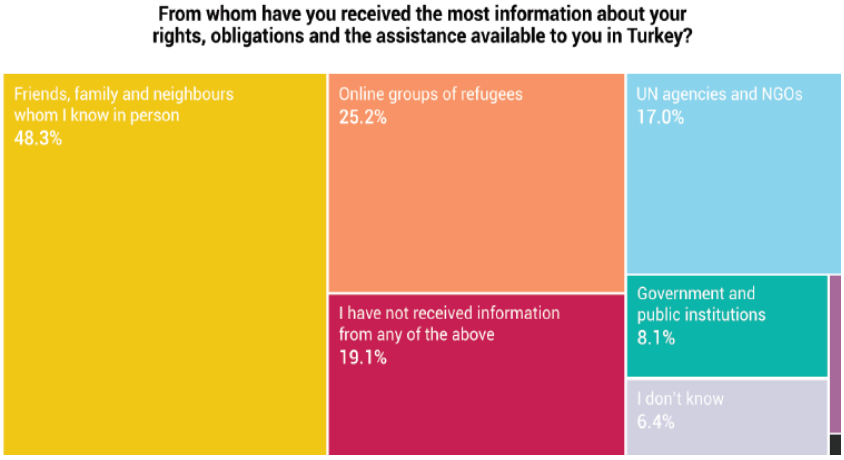
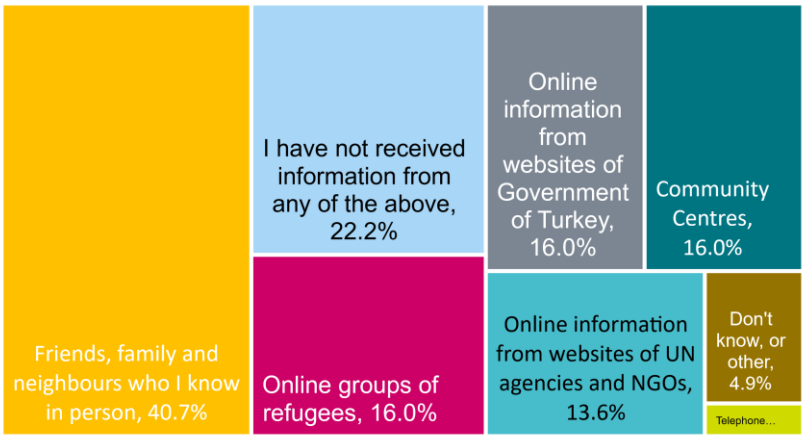


Figure 17 Evaluation team survey of how refugees in Turkey receive their information



The evaluation team triangulated this UNHCR survey through its own team survey (Figure 17), and found a similar distribution. However, in the evaluation team survey we added two other selection categories: community centres, and telephone hotlines. The data (albeit with a much smaller sample than the UNHCR survey) shows that friends and family are the largest information source, followed

[206] UNHCR. (2019). Survey on the information needs and communication channels used by refugees and asylum-seekers in Turkey, Ankara.
[207] This was particularly true of younger refugees: KIIs., and by LGBTI refugees who are well-networked, but not by conservative families: KII. Social media usage by youth and LGBTI refugees also took a sharp upturn during COVID-19: KII.
[208] The data does not add up to 100% because refugees were given the option to select up to three responses.

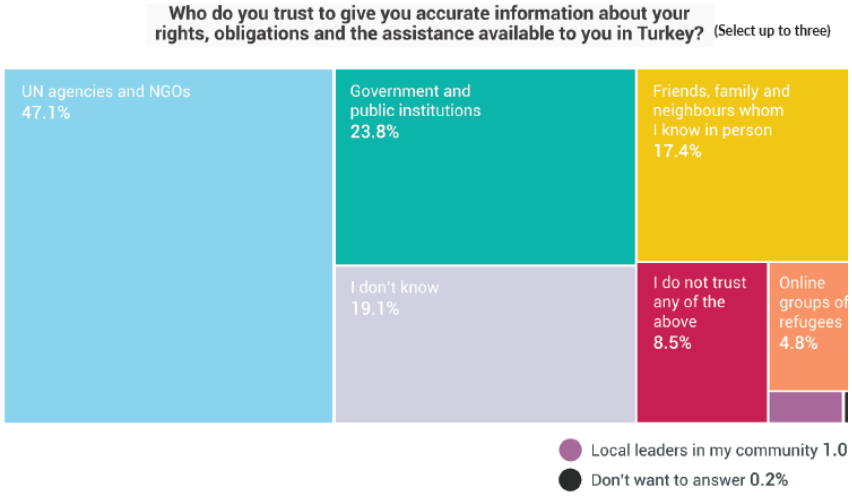
(equally) by community centres, government websites and online refugee groups, followed by UN agency and NGO websites and finally the telephone hotline.

A refugee story told to the evaluation team (see box) illustrates two rather important factors: the first is that seeking information from Facebook and WhatsApp groups is not a passive activity, but a way of actively asking other refugees with the same problem how they actually solved it: it is a focused way of obtaining assistance from peers with experience. The second lesson from this short story is the prevalence and role played by 'brokers.' In this evaluation research we have not seen any academic or agency analysis or reporting on the role of brokers, but in the interviews conducted by the team they seemed to play a significant role. This would be a question to be explored by further research.

> ***The refugee perspective:***
>
> 'People try to solve the problem legally if that is possible. If not, they hire brokers to solve it illegally. When they face a problem and they do not know what to do, they search on the groups and pages on Facebook, they post about the problem to hear other people's opinions about it. They try to solve it without paying to brokers. When they share the problem on Facebook, people might share solutions based on their experiences or brokers would comment saying that they could offer their services.'
>
> *- Interview with the evaluation team*

When it comes to *trusted* sources (Figure 18) a different pattern emerges, with refugees clearly trusting UN agencies and NGOs, and then government sources (in that order). Non-Syrians placed a higher degree of trust than Syrians in the UN and NGOs as information sources[209], which UNHCR concluded reflects the fact that non-Syrians had been registered by UNHCR and have already been much more directly exposed to UNHCR and ASAM than Syrians (many of whom might only ever have transacted with government agencies and sometimes TRCS).

Figure 18 UNHCR survey data on which information sources refugees in Turkey trust



For this parameter, the evaluation team asked a slightly different question: we were interested in which organisations offered the most *informative sessions*. The response from those who had attended an information session was that refugees found NGO sessions the most informative (34%), followed by the UN (17%), TRCS (13%) and GoTR (9%). A category of 'other' attracted 28% support, but the evaluation team was not able to determine what this consisted of (possibly community meetings and/or religious gatherings). Interview evidence suggests that when government officials and refugees participated together in information sessions, this had the dual benefit of improving the understanding of government officials (of refugee rights and obligations, and of the refugees' concerns), and also allowed on-the-spot clarification and problem solving[210]. Regarding the profile of refugees who had participated in an information session, there was a clear correlation with age: older refugees are more likely to have participated than young refugees. Interestingly, there was a significant geographic variation, with only 13% of Istanbul respondents having participated in an information session, compared with 51% in the rest of Turkey. Even though the evaluation team sample was not large, there is a clear pattern that information sessions (group sessions of some sort) reach the older refugees outside Istanbul more, and reach younger refugees and refugees in Istanbul least. This would be consistent with the evidence discussed earlier, that fewer refugees are registered as resident in Istanbul, and that Istanbul has fewer service providers than the south-eastern region.

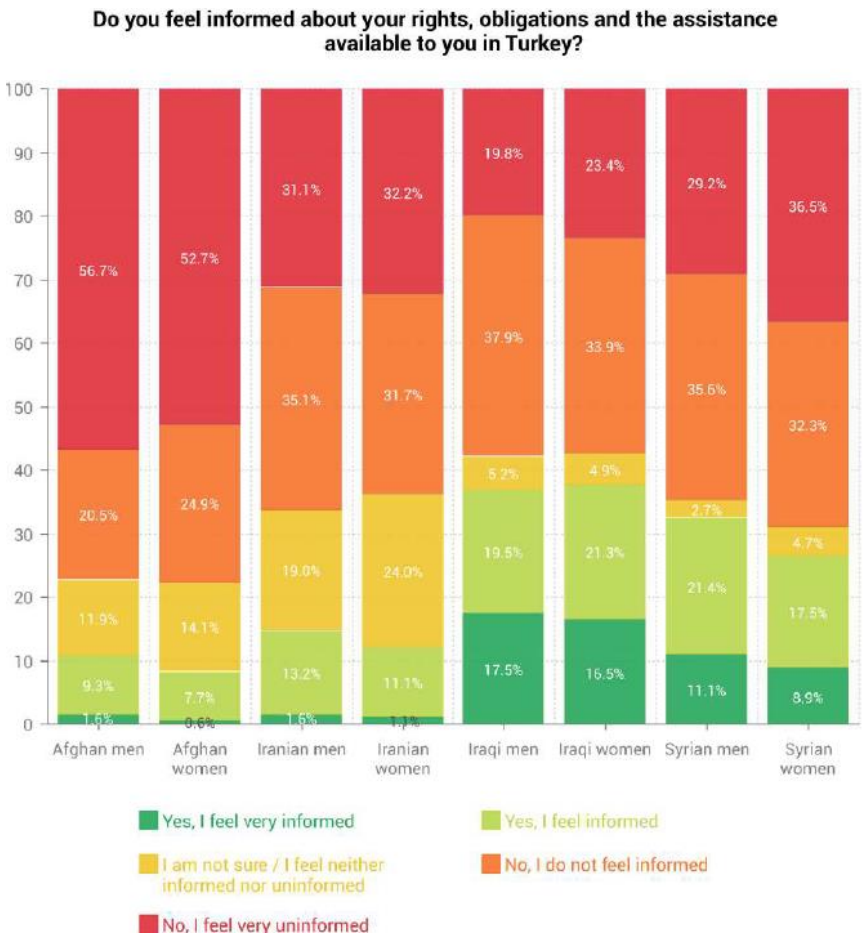
All refugees felt that community social media is easy to access but not reliable in terms of accuracy of information, but that official Facebook pages of UNHCR, TRCS and ASAM were more trustworthy. It is

[209] Confirmed by KIIs.
[210] KII.

interesting that no refugee groups received information from, or trusted, their own community leaders (*mukhtars*, association representatives etc.).

The second set of data captured by UNHCR, also important context for this evaluation, is the extent to which refugees underestimate how aware they are of their rights and obligations: the gap between what refugees think they know, and what they actually do know. First of all, the UNHCR data on how little refugees feel informed is shown in Figure 19.

Figure 19 UNHCR data on how well-informed refugees think they are



This data shows a small gender gap (men felt a little more informed than women). In its analysis, UNHCR suggests that refugees might feel uninformed because they feel disempowered: because they are frustrated about access to their rights and services, they express this as 'feeling uninformed'. Second, the lower levels of 'feeling informed' among Afghans and Iranians might reflect their specific anxiety about resettlement (the function that they associate most closely with UNHCR), while Iraqis and Syrians for the most part have less aspiration for resettlement. Focus group discussions conducted in association with the survey revealed that most refugees were actually aware of their basic rights and services[211]. This perception that refugees might be quite well-informed but feel uninformed was echoed in interviews conducted by the evaluation team.

Several stakeholders remarked that attendance is high at information and awareness sessions right up until early 2020, even though the refugee participants are observed to already understand the basics[212]. The reasons suggested for this were twofold: first, many refugees who are less educated or illiterate choose to return for another information session simply to be reminded of the basics and to check that nothing major has changed[213]. Second, and this was the main observation of interviewees[214], many refugees attend information sessions even when they know a lot, because they are anxious that there might be something more that they have missed, or a change in policy, or a change in a local administrative procedure (for example at DGMM or SASF). Policies and regulations regarding refugees do change frequently in Turkey; for example, the decision to change the medical insurance regime for IP status holders, the campaign of public policy statements about safe zones in Syria or about opening the gates to Europe, and because of this uncertainty refugees seek to understand the very latest trend by signing up (maybe for the second or third time) for information sessions.

[211] The high level of basic understanding in 2019 is confirmed by the endline study conducted by TRC, where even children demonstrated awareness of the foundations of registration, age of marriage, labour law etc. See UDA Consulting. (2020). *Responding to protection needs of refugees in Turkey – endline data collection and comparative analysis,* TRC, Ankara.
[212] KIIs.
[213] KII.
[214] KIIs.

ii. The contribution of the Facility to raising refugee awareness

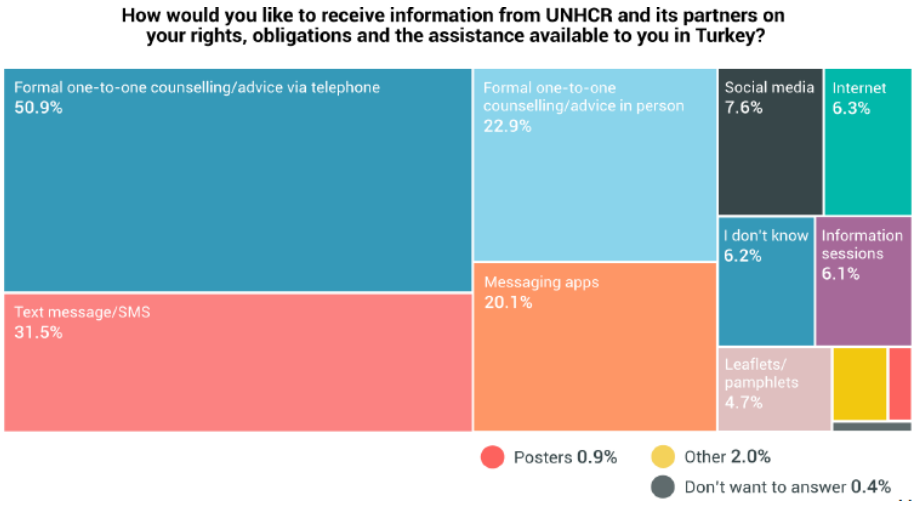
Refugee awareness of their rights and obligations has increased: there is ample evidence that refugees now 'know the basics' – indeed 'they know more than they think they know'. The Facility focused most of its resources in this sector on the formal and institutional mechanisms for raising refugee awareness of their rights and obligations: community centres and individual counselling services through case management. This was effective at reaching a small number of refugees with a high quality of information, but did not directly reach the vast majority of refugees. There is also evidence that telephone hotlines were used extensively, and that they had more reach than in-person services. The Facility contributed to this information channel as well, but to a lesser extent than the formal in-person services.

How the majority of refugees actually received most of their information was through much less formal channels: primarily from family and friends, and secondly from online sources (notably advice from other refugees with similar questions contacted through social media), both of which lie outside the reach of donors and indeed outside the reach of the whole formal refugee support system[215].

iii. Constraints encountered by Facility partners and attempts to overcome them

The last piece of analysis in the UNHCR study, and that is key to this, is analysis of the preferred channels for refugees to receive information on their rights, obligations and services. The refugee preferences reveal constraints and weaknesses in the current system. Figure 20 shows that refugees would most of all want to receive information personally by telephone, by text, through a face-to-face personal counselling session, or through a messaging app. Very few refugees (6.1%) would choose to receive information through general information sessions (e.g. in a group session at a community centre). In the analysis below, we explore what constraints lead refugees to prefer some information channels over others, and how well the Facility has addressed these constraints.

Figure 20 UNHCR survey data on how refugees in Turkey would prefer to receive information



a. Connectivity and internet reach

Although most refugees in Turkey have access to a smartphone, the UNHCR survey[216] confirmed by interviews[217] showed that smartphones are often shared between several people, and that many refugees do not have phone credit but rely upon free Wi-Fi access whenever they can find it. Refugees therefore use smartphones mainly for messaging and social media, and rarely for browsing websites, email or for downloading forms and documents.

[215] Follow-up interviews after the evaluation team online survey (with the limitations of being a small sample) suggested that where donors and agencies see a clear system of laws, rules, projects and services, this is not always what refugees see. A poor refugee speaking little Turkish living on the margin in a cramped neighbourhood (especially if illiterate and socially isolated) cannot see the whole system. Instead, they see a chaotic jumble of friends, brokers and actors, uncooperative officials and well-meaning but generally ineffective NGO workers. Refugees in this situation, even if they know the basics, often do not know where to start to answer a complex question, or who to ask which question to, so they ask everyone they come across for help. Most often they get a reply from friends and family, but they also ask whatever agencies and officials they can reach regardless of whether those agencies and officials are responsible for the issue in question. This creates inefficiencies in the whole system as refugees are referred back and forth, tying up resources and still not getting the answers they need. The gap in the system here seems to be clear and easy-to-access pointers that orient refugees clearly to where they can receive the information they need.

[216] UNHCR. (2019). Survey on the information needs and communication channels used by refugees and asylum-seekers in Turkey, Ankara.

[217] KIIs.

With Facility support, UNHCR attempted to address this constraint by installing 20 internet-connected kiosks – pre-set to explore UNHCR's web-based online Help service and Services Advisor. Unfortunately, the various organisations that were approached to host these kiosks did not in the end agree (first NGOs were approached, then DGMM, then MoFLSS – it seems that all of them agreed and then retracted their agreement). At the end of Q1 2020, UNHCR was still waiting to install the kiosks in suitable locations.

b. Illiteracy

Illiteracy (and low levels of education) are also a major constraint to accessing information, and this is likely to remain a problem for some time given the high number of refugee children who are not in school. As several interviews noted, illiterate refugees will always prefer to get information face to face, not on social media but talking on a hotline, talking with family and friends, colleagues, service providers or officials[218]. Although the printing of brochures and leaflets was not a major activity, one interviewee observed that this is the least effective form of providing information[219]. Telephone hotline services supported by the Facility were able to work around this constraint.

c. Turkish language skills

The Facility has helped to ensure that all basic information for refugees is available in Arabic and most of it also in Farsi, so Turkish language skills are not generally an obstacle to accessing information. Lack of Turkish language is, however, still an obstacle to accessing public services, especially health care and education in Turkish institutions, and more generally lack of Turkish language skills leaves refugees feeling vulnerable and less informed. Addressing this constraint, the Facility invested considerably in Turkish language courses (through community centres) and in providing interpreter support to refugees, both in-person and online interpreter services.

The evaluation team has no evidence of the prevalence or importance of Turkish language training, but suspects that Turkish language training might be a highly cost-effective investment in refugee protection and well-being, as it opens the door to employment, education, health and other services and social cohesion.

d. Refugee nationality and location

Several interviewees noted that the priority for the Government of Turkey, and where they have focused their registration efforts, social cohesion activities, public information and support, is to assist Syrians in Turkey. In many ways, the refugee support system is designed for Syrians, and then secondarily benefits non-Syrians[220]. But because it is not designed to support non-Syrians, the information and services available to them are more limited. This is compounded by the fact that most non-Syrians are living in satellite cities, which by design are not the same provinces as where Syrians are concentrated, and which therefore have far fewer service providers (often only ASAM and PDMM). The Facility adopted a 'one refugee' approach that does not differentiate between Syrians and non-Syrians, and yet the footprint of its projects for the most part followed the same logic as the Government of Turkey: building projects around Syrian refugees and then extending services to non-Syrians, notably including non-Syrians in ESSN and CCTE. This emphasis on Syrians (or more accurately, on the Syrian-concentrated provinces) has been effective at reaching the largest number of refugees most efficiently, but has left behind some pockets where refugees are less informed because they are not Syrian or more isolated. Only the ASAM project (and its successor project funded under Facility Tranche II) have addressed this gap of non-Syrian refugees in satellite cities, and now those projects are ending (late 2020), the Facility no longer seems to have a way to address this continuing need.

e. Unregistered and out-of-province refugees

While most community centres provide information to refugees who are unregistered or out of province, refugees in these situations might assume that these community centre services are not available to them, or might be reluctant to access these services if they are concerned about becoming visible or increasing their risk of apprehension. The Commission did make significant efforts (through HIP criteria and in the negotiation and monitoring of project agreements) to ensure that all their NGO partners

[218] KIIs.
[219] KII.
[220] For example, non-Syrians seem to benefit from ESSN and CCTE to approximately the same extent as Syrians (see European Commission. (2019). *Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey*. Brussels: EU).

provided support to unregistered and out-of-province refugees, but project reports and interviews confirmed that NGO partners do not systematically record and report on how many of their clients are in this situation, so the effectiveness of this coverage cannot be demonstrated.

f. Outreach

Finally, in terms of constraints, readers will recall the earlier discussion (3.2.1) on the limitations on NGO outreach, which are as much of a constraint for information-provision as they are for registration support[221]. The Facility is well aware of these constraints. As explained above, the EU has been open about its concern with the government regulatory limitations on outreach, noting in successive Steering Committee meetings the impact this has upon protection effectiveness, but it has not been successful in its advocacy on this matter.

In sum, the EU was aware of the constraints preventing refugees from accessing information on their rights and obligations, and the Facility made significant efforts to address those constraints. This was more successful for language and literacy barriers, but less successful for barriers presented by low connectivity and physical or social isolation.

g. Other factors causing changes in the levels of refugee awareness

The evaluation team has identified three main factors that have increased the levels of refugee awareness of their rights and obligations, outside the context of projects and services. First, most Syrian refugees have now been in Turkey for 4–5 years, some for even longer. Simply the length of time they have spent in Turkey, living, working and accessing services has increased their understanding of their rights and obligations. Second, the level of Turkish language capacity among Syrian refugees has also increased – in part thanks to investments by the Facility, allowing refugees to access information from Turkish sources without the intermediary assistance of the refugee support community. And third, many refugees continue to seek and to receive information from other refugees. This came through strongly in the UNHCR survey data, but was confirmed by the evaluation team's survey and especially by the refugee interviews, where most refugees described the role of peers in helping them understand how to solve problems as being more important than government agencies or NGOs.

3.2.4. Summary of contribution considerations

Refugee awareness of their rights and obligations has clearly increased over the period of Facility Tranche I, and there is substantial evidence that most refugees (especially Syrian and Iranian refugees) understand the basics and are now seeking more advanced information related to the resolution of specific problems. The Facility has contributed significantly to this progress, and was probably the largest single donor to these activities. However, the main activities supported by the Facility were group and individual awareness-raising and counselling sessions delivered in-person in community centres and by government service providers (PDMM, SSCs), and to a limited extent by outreach workers.

The large number of refugees, their geographic dispersal, and low levels of literacy and smartphone availability suggest that the most effective way to provide basic information services to refugees is through telephone hotlines, supported by online tools such as chat functions associated with websites and messaging apps. This is also the refugees' preferred way to receive information, which has become more evident since the onset of COVID-19 when nearly all refugee information services have moved online.

There is a wide range of activities and actors providing information to refugees on their rights, obligations and available services, each with their niches, comparative advantages and weaknesses in relation to how refugees actually do and want to receive information. The Facility has contributed significantly to all of these actors and activities, but in a fragmented way (responding to stand-alone proposals from partners), and with a historical emphasis on the bricks-and-mortar, in-person service providers who only reach a fraction of the refugee population and at relatively high per capita cost. The Facility has invested somewhat in remote services (through UNHCR's Services Advisor and online Help function, and through hotlines managed by UNHCR, TRCS and NGOs), but this has been a relatively

[221] KIIs., and also project reports noted that UNFPA-provided mobile units to MoFLSS for outreach, but that these mobile units were not used due to problems obtaining permits and recruiting drivers.

small investment and COVID-19 has emphasised both the need for, and effectiveness of these services.

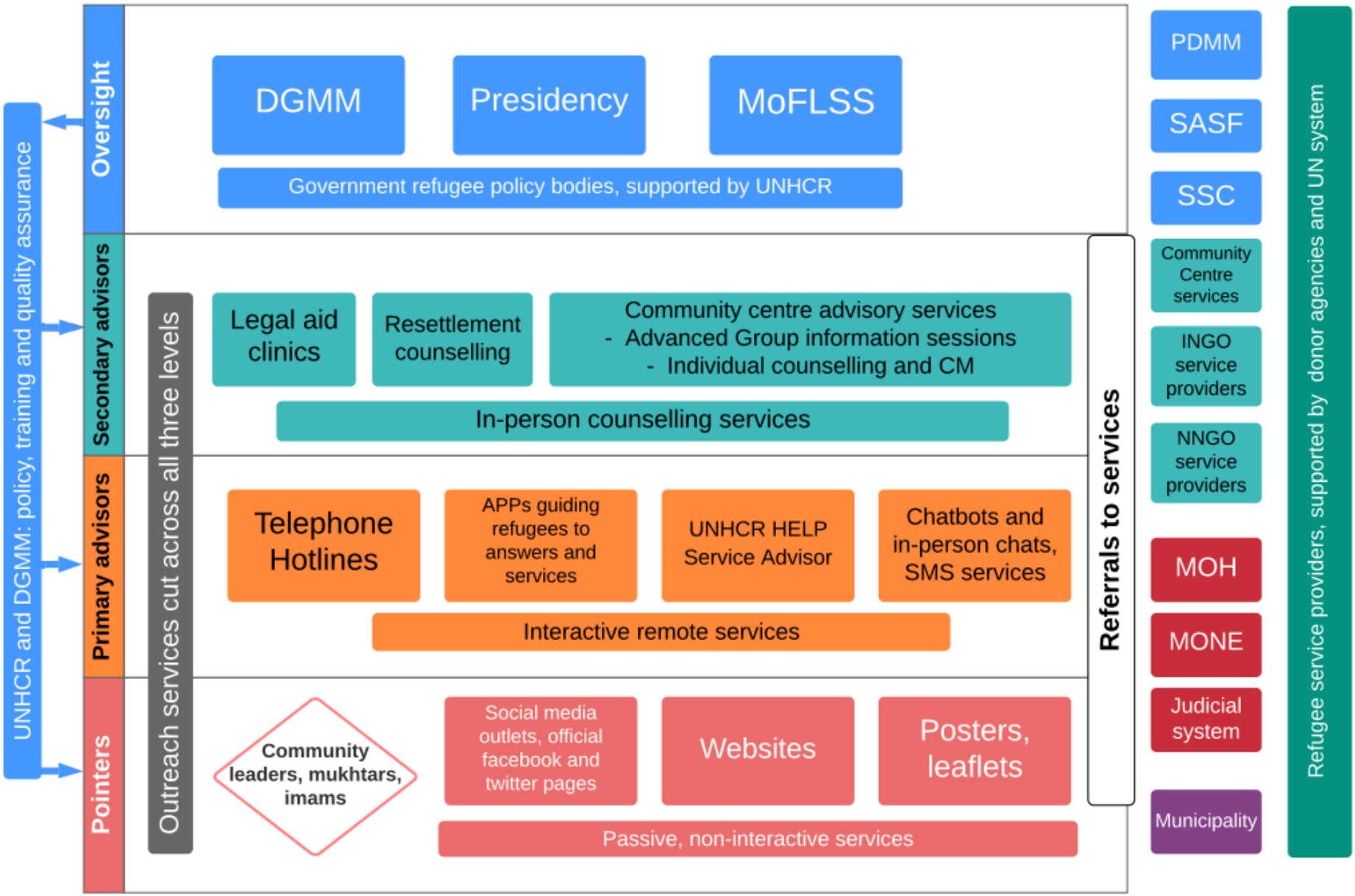
As far as the evaluation team is aware, the Facility has not taken a system approach to information and awareness – mainly because the actors themselves have not organised themselves into a coherent system.

In the evaluation team's analysis, there is an implied but not fully articulated 'information and awareness ecosystem'. In the diagram below (Figure 21) the team has attempted to describe the different components of this ecosystem, and recognising the evidence and discussion above, to differentiate them according to their primary function. In this system map, the evaluation team has drawn a distinction between four levels:

1. Those activities whose purpose is to attract the attention of refugees and point them to where information can be found (called '**pointers**').
2. Those activities whose purpose is to provide the first level of information to the largest number of refugees. Bearing in mind the volume of the demand, the geographical spread of refugees and the need to reach refugees who are physically or socially isolated, illiterate refugees as well as the refugees' preferences for how to receive information, these are all remote service providers (called '**primary advisors'**). After transacting with a primary advisor, a refugee should either have increased their basic awareness, received an answer to their information need, self-referred to a service provider, or learned how to access the next-highest level of the system for a more tailored response.
3. Those activities that provide in-person counselling to refugees. This level of the system should be expected to meet the information needs of fewer cases with more complex problems, and to facilitate referrals to services (see next section). Within this level a distinction is drawn between two types of in-person services in community centres: group sessions and individual counselling. Given that the basic information needs of refugees should be met by primary advisors, the role of these group sessions should not be to replicate the information available to larger numbers of people and at lower cost remotely, but to focus on advanced topics and issues facing refugees as they move up the awareness and information ladder. For example, this level could address (in a group setting) issues of employer–employee relations in an informal employment context, supporting children unable to fit into the education system, or navigating the disability support system in Turkey. This level of support, which can be seen as the apex of the information and awareness pyramid (equivalent to role that universities and hospitals play in education and health systems) is called **'secondary advisors.'**
4. The team felt it was important to envisage that this ecosystem should contain a capacity-building, oversight and quality assurance function for the whole system, and proposes that this would be carried by the Government of Turkey supported by UNHCR.

In the ecosystem map below, readers should also note that, where outreach services exist (now or in the future), these can connect with all of the levels of advisory service: outreach can be used to educate and engage with community leaders so they can be more effective **pointers**, they can mainly serve as **primary advisors**, and occasionally as **secondary advisors.**

Figure 21 System map of the awareness-raising and information ecosystem



3.3. **Judgement criterion 11.3:** The Facility has strengthened refugee access to specialised protection services

3.3.1. 'Access to specialised protection services' as an outcome

i. What is a specialised protection service?

There is no clear definitional boundary around 'protection.' However, it is widely agreed that any service received by a refugee and which provides them their rights (including basic needs, education and health services) has protection value, even if 'protection' is not the primary intent. Furthermore, as discussed in EQ. 2.5 of the main evaluation report, in addition to the broader (passive) protection benefit of other sectors of refugee support, it is possible to implement 'other sector' projects in ways that enhance their protective value – through protection mainstreaming. When activities are 'protection mainstreamed', there can be a protection analysis to inform the activity, more vulnerable populations can be targeted or accommodated, and activities can be shaped to provide greater protection benefit (or at the very least to 'do no harm'). In the Facility, development activities all have this 'passive' protection benefit, and if they are 'protection mainstreamed' then that protection benefit can be increased, but the development arm of the Facility is not considered to provide 'specialised protection services'[222].

In humanitarian contexts, protection actors single out a separate set of services that are 'specialised' protection services, among which we can count registration (and regularisation of registration), gender-based violence (GBV) services, child protection (especially activities to address early marriage and child labour), and legal aid. In the Facility, it is the role of the Commission's humanitarian channel and its partners to deliver specialised protection services of this nature.

The protection community also considers protection risks, and in that perspective identifies who is particularly vulnerable and therefore more likely to have to resort to 'negative coping strategies' (different kinds of personally or socially harmful behaviours). These could be, for example, because of their social isolation as an ethnic minority, because of their need for specialised services in the case of disability, or because of exceptional family structure (a large number of young children, or a single parent). Finally, as explained earlier, the process of identifying needs and referring to another level of service usually takes place in a counselling session conducted by a 'one-stop-shop' (community centre, PDMM Protection Desk, SSC etc.) that does not separate out which services are 'specialised protection', and instead refers refugees to whatever services they need ('specialised' or otherwise)[223].

As a result of these factors, neither the activity of referral, nor the reporting on referrals provided by partners, separates out 'specialised protection' from all types of referrals. Accordingly, while this report does look at 'specialised protection' services in more detail in Section 3.3.3 below, the activity reporting (for example Figure 22 below) does not separate 'specialised protection' from all other sorts of referrals.

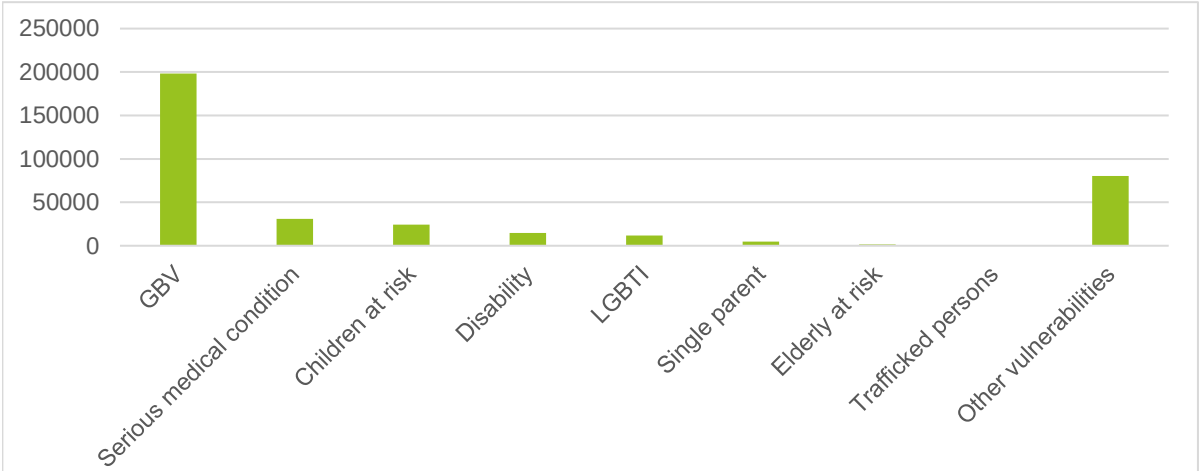
ii. What are the protection needs in Turkey that need services?

Key stakeholders have defined the typology of protection needs of refugees in Turkey in different ways. First of all, the LFIP defines a refugee with special needs (i.e. protection vulnerabilities) as 'an unaccompanied minor; a disabled person; an elderly person; a pregnant woman; a single mother or a single father with an accompanying child; or a person who has been subjected to torture, rape or other serious psychological, physical or sexual violence.'[224] This LFIP definition is important because this defines the community of refugees eligible for special government attention and services (for example as the refugee-eligible clients of SSCs, which are also organised according to these types of vulnerability).

[222] The evaluation team was informed that some Facility Tranche II projects include activities that specifically target GBV and mental health, but these were not assessed in the course of this Tranche I evaluation.
[223] See below 3.3.3 (i) (a) for a detailed discussion of the Commission's case management system for specialised protection cases.
[224] https://www.unhcr.org/tr/wp-content/uploads/sites/14/2017/04/LoFIP_ENG_DGMM_revised-2017.pdf. Note that LGBTI are not identified as a vulnerable group.

Agencies participating in the 3RP record their protection cases in ActivityInfo according to protection risk factors (Figure 22, illustrative data only for 2019 and the first half of 2020).

Figure 22 Categories of protection referral used by the 3RP and reported by partners to ActivityInfo



The EU provides an instructive summary of protection needs that is a mixture of contextual factors, vulnerable groups and programming gaps (see Box 3)[225].

Box 3 Refugee protection needs as perceived by the EU

The following needs have been identified under protection since 2016:

a. There is a gap in addressing the needs of non-registered refugees, as well as the causes for non-registration.

b. Barriers to refugees' meaningful and equitable access to services (e.g. language, lack of information, lack of know-how to navigate the Turkish system, cultural and socio-economic differences, lack of institutional capacities and resources, lack of access to livelihoods) continue exposing refugees to protection risks.

c. Negative coping mechanisms, such as child marriage, child labour, informal employment, inadequate housing etc. are prevalent risks among refugees.

d. The protection needs of the double disadvantaged groups (Doms, Yazidis or other marginalised, LGBTI, seasonal workers, sex workers etc.) cannot always be addressed sufficiently through currently existing government services, and the role of national NGOs remains vital.

e. National capacities to provide social services (including psycho-social and legal support) are not sufficient or are overstretched, especially in refugee dense areas. Constraints in achieving the necessary outreach are also relevant to consider.

f. Access to services in some areas, in particular in remote/rural locations, is limited.

g. The application of refugee entitlements/rights is uneven across provinces.

h. Increasing tensions between the host community and refugees as well as among the various refugee communities pose additional challenges to social cohesion.

The approach taken by this report is to discuss the protection service providers and the specialised referral mechanisms in Section 3.3.2 through the description of Facility interventions supporting the outcome of access to services. In Section 3.3.3 on contextual analysis, the report then discusses some of the special protection needs and vulnerable groups (e.g. GBV, child protection, LGBTI refugees, seasonal agricultural workers) and constraints experienced by refugees in accessing the services to address those needs.

[225] 12th meeting of the *Facility Steering Committee*, 17 May 2018.

iii. Measurable data of access to specialised protection services

a. Measurement of referrals

All Facility partners report regularly on their referral activity – it was a key metric in the Commission's monitoring and reporting system since the outset. While the data is rather complex, because reporting parameters changed in the middle of the Facility Tranche I period and also because partner reporting discipline was uneven, the evaluation team has comprehensive data on referrals.

b. Information on feedback after referrals

There is no comprehensive data on what happens to cases after referral – that is, whether a refugee actually received a service and of what quality.

In the very early period of the Facility, before refugees were accessing specialised protection services from government (e.g. GBV and child protection services from SSCs) and before ESSN and CCTE, most referrals were being made from UN agencies and NGOs to other UN agencies and NGOs, within what has been described as a 'humanitarian bubble.' In this short-lived early period, feedback after referrals was better – but at the same time there was less capacity, with fewer cases receiving a narrower range of services[226]. Even now, protection cases referred to other NGOs get better feedback[227].

The main reason there is no comprehensive feedback after referrals is that the government does not usually provide feedback to NGOs on cases that they have received from them, partly due to privacy considerations, but also due to an underlying lack of government confidence in NGOs (international or national). [228] The exception is TRCS, which has a privileged relationship with government (especially PDMM and SSCs), although even TRCS did not report systematically to donors on the quantity and quality of government services after referral[229].

> 'Once NGOs refer to the state, they do not have a right to receive any information. The government says, 'thank you the case is with us now.' They do not have a legal obligation to report back to NGOs about the case'
>
> *– Facility partner NGO*

Most partners claim (e.g. in their project proposals) to have complete case management systems that follow up all formal cases[230], by telephone if necessary[231], and that they only close each file after it is resolved (problem solved or the refugee disengaged). Others do not follow up systematically for various reasons, perhaps because they are mainly the recipient/end point of referrals and refer very little onwards[232]. However, despite the 'model' of case management following cases until completion, EU staff generally felt that the depth and quality of this case management system might be somewhat overstated[233]. In any case, there is still no systematic reporting to the Facility on referrals 'completed' or 'cases resolved'[234].

Facility staff still would like to see reporting on the success rate of referrals, since a substantial amount of Facility resources are invested in a large and complex system of protection referrals, without objective data on the outcomes (i.e. protection problems solved). The importance of this is underlined by the protection mainstreaming guidance[235], which considers following up on services received to be one of the standard parameters of mainstreaming that should be integrated into the whole M&E system of every humanitarian response.

[226] KII.
[227] KII
[228] KIIs.
[229] KII, and review of TRCS project reports to the Commission.
[230] KIIs.
[231] KIIs.
[232] KII.
[233] EU staff interviews.
[234] We admit that reporting on the outcome of referrals is inherently challenging, since it would somehow require reporting on services not received (and over what time period?) and some subjective measure of the quality of services. There is a further complication in that some cases are referred to several service-providers, or to the same service-provider several times as a single case progresses through time (KIIs).
[235] DG ECHO. 2016. Thematic Policy Document 8: Humanitarian Protection – Improving protection outcomes to reduce risks for people in humanitarian crises. EU, Brussels, and further specific in Turkey HIP 2020.

iv. Other evidence that refugees accessed specialised protection services

Notwithstanding gaps that this report discusses later, the qualitative evidence suggests that refugees in Turkey are able to access a wide array of protection services. Notably, registration of Syrians is very comprehensive (less so for non-Syrians), media monitoring and detailed ESSN surveys show that there is no huge crisis of refugee poverty driving refugees to negative coping strategies to meet their basic needs (thanks to a combination of ESSN and official tolerance of informal labour)[236], and refugees generally feel increasingly secure in Turkey[237]. The 3RP Protection Working Group sees the establishment of systems to identify the specific protection needs of individuals, and then to refer them to appropriate specialised services, as one of the major success of the protection response in Turkey, and they point out that individual case management is rare in such large refugee populations[238].

In sum, over the period of the Facility the referral system has developed substantially. By early 2020, in large urban centres of the south-east (to a lesser extent in Istanbul and lesser still in small cities with few refugees[239]) the system of referral and services has become quite advanced, with a wide range of service points[240] providing diverse services. There is also qualitative evidence that referrals to, as well as services provided by government agencies are growing stronger, and reaching beyond the limits of NGO service providers.

Table 11 Summary of observed outcome: strengthening access to specialised protection services

Expected outcome	The Facility has strengthened access to specialised protection services
Observed outcome	Notwithstanding some important gaps, registered and in-province refugees in Turkey are generally able to access a wide array of protection services. Furthermore, as government services continue to extend their reach, more refugees are able to access a wider range of services and in more locations.
Facility results contributing to the outcome	**Indicator 11.3.1:** Number of referrals from refugee service points (registration centres, hospitals, schools, community centres etc.) to specialised protection services of government and non-government service providers with support from the Facility. • According to Facility reporting, **514,376** refugees were referred to specialised protection services with support from the Facility Tranche I. **Indicator 11.3.2**: Level of refugee satisfaction with the protection services received after referral from partners funded by the Facility • There is no comprehensive data available on the outcomes of referrals: whether the referred refugee received the recommended service and at a sufficient quality. Those implementing partners providing partial reporting on this, and anecdotal evidence from interviews and reports, suggest that refugees received good support from specialised non-government service providers including CCTE and ESSN, adequate support from PDMM (registration) and education institutions, and less support from government health services and SSCs.

[236] Readers should note that this report was drafted before the impact of COVID-19 on refugee incomes was assessed, although the protection community was very concerned at the possibility of a dramatic worsening of refugee poverty due to the collapse of informal employment (necessary for refugees to meet their basic needs).
[237] Migration and Integration Research Centre, (2020*) Syria Barometer 2019*, Ankara.
[238] KII.
[239] KII.
[240] Community centres, legal aid clinics, SSCs, migrant health centres, specialised NGOs.

v. Data sources and data quality

The Facility data on *referrals* (Table 12) combines three datasets: (i) the Commission's humanitarian protection monitoring data from January 2017 up to September 2019 (using the measurement parameter 'Number of refugees with protection needs identified and referred to relevant services'); (ii) the Commission's humanitarian dataset for Q4 2019 (parameter: 'unique referrals to specialised services')[241]; and (iii) the ASAM data[242] (parameters: 'Number of persons with specific needs and vulnerabilities identified and referred to governmental services' and 'Number of external and internal referrals made by ASAM and other institutions to MCT' – which is essentially referrals to ESSN). In all cases, only the projects contained in Facility Tranche I were selected, and small numbers of Turkish citizen referrals were excluded from the count (but should be noted as a good practice for social cohesion).

Table 12 Refugee referrals to specialised services (all channels) during the Facility Tranche I

Referrals with ASAM		
TOTAL	514,376	%
TOTAL SYR	477,380	94.0
TOTAL NON-SYR	36,996	6.0
UN	473,685	
UN SYR	444,776	96.2
UN NON-SYR	28,761	3.8
TRCS	12,972	
TRCS SYR	12,477	96.2
TRCS NON-SYR	495	3.8
NGO	27,867	
NGO SYR	20,127	94.9
NGO NON-SYR	7,740	5.1

The Facility data on *protection services provided to refugees* (Table 13) combines the former Facility indicator 'number of refugees that benefited from protection service' with the new Facility indicator 'number of protection services 'events' provided/conducted,' which counts the number of instances of service provision rather than the number of unique beneficiaries of services, and which is more compatible with the way the former indicator was interpreted by partners. In the view of the evaluation team, the data on services provided is somewhat problematic because partners report very different types of assistance under this heading.

Table 13 Protection services provided during the Facility Tranche I (EU data)

Protection services provided		
	beneficiaries	as % all services
UNHCR	1,949,596	72.2
UNFPA	695,380	25.8
UNICEF	21,439	0.8
TRCS	19,773	0.7
NGOs	12,614	0.5
Totals	2,698,802	

For the most part, TRCS and NGOs seemed to apply this indicator quite uniformly and narrowly to describe situations where a refugee was individually assessed in some sort of intake process and provided with protection-oriented assistance. For example an individual protection counselling session, an individual psycho-social support event, a case file established in order to guide a range of protection services over time, or a protection-oriented cash payment was made. As far as the team can ascertain, this did not cover all the services provided by a community centre (e.g. it did not cover users of the child-friendly space, Turkish language students, life skills class participants).

However, UNHCR and UNFPA used much wider interpretations of the same indicator, as can be seen in Table 13 which provides the data on protection services provided only in order to illustrate the problem. UNFPA seems to have included in their reporting under this indicator two large groups of beneficiaries who did not receive an 'individual service' comparable to the NGO services: (i) 235,862 women receiving information on GBV prevention; and (ii) 152,436 refugees receiving information in SSCs. The team is not suggesting that these are not protection activities, but that such larger numbers of group beneficiaries receiving information renders invalid the comparison with the NGO 'individual assistance' beneficiaries. Similarly, UNHCR reported a total of 1,949,596 beneficiaries under this reporting parameter, which seems to have included refugees visiting

[241] There is also a parameter of 'number of referrals made', which is a count of referral events and not compatible with the Q4 2019 data on individuals referred.
[242] From the ASAM end of project report.

UNHCR's web-based information services and telephone hotlines, non-Syrian registrations, survey participants etc. No doubt the UNHCR reporting included a number of people receiving very direct personalised protection assistance. For example, resettlement counselling, and individuals assisted by UNHCR's NGO partners with counselling, cash and in-kind assistance, but separating the individualised assistance from the other types of group assistance was not possible. In sum, as a result of these different interpretations of the indicator, the Facility data on 'protection services provided' contains incompatible datasets that render it impossible to draw general quantitative conclusions on the number of Facility beneficiaries of protection services.

The 3RP data was not used extensively in this analysis, because it did not prove possible to extract the Facility-specific activities from those of the whole protection community, but where it is referred to, it considered data under the 3RP reporting parameter '2.1.2 – # of individual persons with specific needs identified and referred'. The team used this 3RP data primarily to describe the relative scale/weight of different protection needs as a point of comparison with the Facility.

Qualitative data on referrals was found in about 20 documents referring to protection needs and vulnerable groups, workshop reports and guidance notes, as well as in about 40 project documents from all protection partners. There was rather little academic literature on protection needs and services (in contrast to education and health, which have been the subject of considerable academic endeavour in the last 5 years). Finally, the matter of protection referrals was pursued in all 45 key informant interviews.

vi. Hypothesis on the Facility's contribution to the observed outcomes

Building on the enabling policy framework provided by the Government of Turkey through the LFIP, the Facility made a considerable contribution to the provision of specialised refugee protection services in Turkey (including registration, child protection, GBV and legal aid) by strengthening the capacity of key government and non-government service providers.

The Facility also supported the process of needs identification and referral, by (i) supporting a wide range of partners to conduct needs identification and referral; (ii) supporting specialised agencies reaching out to isolated refugees with particular problems of access and needs; and (iii) actively focusing on the referral process through support for case management and individual protection assistance.

In this way, the Facility strengthened both the supply and the demand sides of service access.

3.3.2. Description of Facility interventions aimed at supporting the outcome of improved access to protection services

This section describes the main Facility interventions that provided referrals to services, and also those that provided protection services. It is organised by type of partner.

i. PDMM protection desks

The key to providing access to protection services is to identify which refugees have protection needs, and the best way to achieve this is at a service point through which all refugees must pass. UNHCR achieved this with non-Syrians, where (until September 2018) ASAM and UNHCR were able to conduct individual protection assessments as an integral part of the registration process (as UNHCR does universally where it manages registration). However, Syrians were not registered by UNHCR, and their data was not shared by DGMM with UNHCR or other agencies, so their protection needs were not visible to UNHCR and external actors. UNHCR tried to insert a protection assessment step into the ESSN registration process, but its proposal to implement ESSN was not accepted by the Commission, and a subsequent attempt to insert a protection assessment into the Social Assistance and Solidarity Foundation (SASF) registration process was not accepted by the government.

UNHCR made a second and successful attempt to encourage a systematic assessment of refugee needs, by persuading DGMM to introduce a protection needs assessment step into the verification project – a separate step in the verification process where persons with special needs are sent to a separate unit ('protection desk') within the verification centre for confidential counselling and onward referral to specialised services. Verification (including the protection desks) was supported through two

successive UNHCR projects, which were both extended to the maximum of 24 months due to slow implementation of the verification exercise. After top-ups, the first project ECHO/TUR/BUD/2016/91006 cost EUR 43,251,517. The verification component was EUR 27,588,215 but the proportion of that which was devoted to the protection desks was not specified. Protection desk performance was recorded as 14.2% of cases referred (against a UNHCR target of 15%). The second project ECHO/TUR/BUD/2017/ 91005 amounted to EUR 33,100,000 after increases. Of this, the verification component was EUR 11,280,020 and (as with the earlier project) the proportion of this allocated to the protection desks was not specified. Protection desk performance was recorded as 15% of cases identified with special needs (against a target of 16%)[243].

The protection desks ended up becoming a key feature of verification and are regarded by UNHCR and the EU as one of the most important protection activities in Turkey[244]. Protection desks were established in 26 verification centres, and staffed over the project lifetime with 88 Arabic-speaking interviewers (some of whom might also have had a professional qualification as a psychologist or social workers, which was preferred but not required). These were financed by UNHCR, training was provided by UNHCR and DGMM, and they were supported by UNHCR follow-up monitoring. Approximately 20% of verified refugees were referred from the registration officer to the protection desk for some sort of protection follow-up[245] using 61 categories of vulnerability (including sexual orientation). However, DGMM did not report the details of cases assessed by the protection desks to its immediate donor UNHCR; only broad categories based on the agreed indicators at the start of the project[246].

Interviews confirmed the project reports that the most frequent destination of referrals from protection desks was to PDFLSS for ESSN registration or GBV. Referrals were also made to other state institutions (MoNE for OOSCs, Police as well as PDFLSS for early marriage etc.). PDMM referred many cases to TRCS, but rarely referred cases to NGOs[247], although sometimes cases of extreme need were referred to NGOs or to municipalities for charitable welfare[248], or for some types of material assistance (i.e. hygiene products, rent assistance) that were not available from state institutions[249].

Although the protection desks are considered to be such a success that UNHCR is supporting DGMM to maintain them in several high-volume locations during a successor project (outside the scope of this evaluation), this is based upon a qualitative assessment of their effectiveness[250]. Unfortunately, as with other referrals discussed below, there is no systematic feedback data on case resolutions:

> *It should be noted that most referrals to government institutions made via the PDMMs were not done through a formal referral system, but through official letters to government institutions and/or through counselling of refugees advising them to approach the service providers. As a result, in the absence of a referral monitoring tool, it is difficult to determine whether the high number of referrals, for example to MoFLSS and municipalities, has led to increased access to services provided.*[251]

UNHCR is hoping to introduce more rigour into the follow-up process by having protection desk referral information entered into the DGMM database known as Goçnet[252].

Several observers in DGMM, UNHCR and the EU felt that in the end one of the most important outcomes of the protection desks was that they increased the level of understanding throughout DGMM of what protection is, and that staff came to see the

> 'their role [protection desks] is really important and their number should be increased. Protection desks are functioning as a bridge between people and other institutions. If we removed these desks from the process, we would have had many difficulties.' – *PDMM*

[243] There is a discrepancy between two reported referral rates: UNHCR's self-reporting was 20% but the Commission's internal project summary records 15% cases identified as with special needs.
[244] KIIs.
[245] UNHCR project reports.
[246] KII.
[247] KII.
[248] KII.
[249] KIIs.
[250] UNHCR is convinced that developing the capacity of key government institutions is the best investment at this time, but they are concerned that it can be difficult to persuade humanitarian donors of this, since it is difficult to show quick, tangible, measurable results (K11).
[251] UNHCR project report.
[252] KII.

function of DGMM as more than administration but also as an actor in greater ecosystem of refugee assistance[253].

ii. MoFLSS social service centres

The MoFLSS' extensive network of SSCs provides social assistance in every province and major community in Turkey. They were supported by UNHCR (in the Istanbul region), UNICEF (for the ASDEP services and child protection, as part of CCTE), and UNFPA was the main 'structural' UN partner agency. UNICEF and UNFPA support was financed by the Facility, and UNHCR's support was financed by other donors. While the declared objective of the UNFPA project was 'to improve access of most vulnerable refugees to social services in Turkey', the implied longer-term strategy was to open up the Turkish social assistance machinery to refugees, and to create the foundations for ongoing refugee support through Turkish government systems and eventually with Turkish government financing[254].

The main Facility project supporting the SSCs was ECHO/TUR/BUD/2017/91003, with a final budget (after a small increase) of EUR 7.2 million and taking place over a 33-month period. This project became operational in October 2017 but encountered severe delays in implementation, ascribed to slow recruitment, including delays in obtaining work permits for Syrians working as 'service mediators' (outreach workers) and interpreters, as well as delayed procurement. Over the lifetime of the project, 236 staff were recruited and trained, in 27 SSCs spread over 19 provinces[255]. Starting from an initial general needs assessment workshop with representatives of selected SSCs and MoFLSS, the decision was made to provide a similar package of support to each SSC (staff, vehicle, training) regardless of the size or differential needs of the SSC or the size of the expected refugee population. Two components: the purchase and mobilisation of three mobile service centres[256], and the adoption of a suite of standard operating procedures (SOPs), training of trainer modules and policy papers, were not complete by the time of this evaluation in mid-2020 (the documents were reportedly completed in October 2020 but their adoption by MoFLSS is not known). Notwithstanding these incomplete components, the project seems to have been largely successful in building SSC capacity to provide services to refugees, and in providing a range of services to Syrians and host communities. An external evaluation conducted in 2020 found that the project 'achiev[ed] fully the expected results of its first component (expansion of service delivery). It achieved several of the results envisaged under the second component (improving the quality of service) but is lagging in fulfilling the targets of the third component (strengthening social service policy)'[257].

The UNFPA project provided a range of services to refugees that were similar to those of community centres: information on rights, obligations and services; general and legal counselling; material assistance; referrals; and social cohesion. The only services offered by community centres that SSCs did not also offer were classes in Turkish language, life skills and vocational classes. As a result of the way MoFLSS services are organised for Turkish citizens, there were specific support services available for children, especially if they were unaccompanied or separated from their families, for women victims of violence, and for the disabled[258]. SSCs were not well-equipped to provide support to men who have been victims of sexual and gender-based violence, to marginalised groups ethnic or social groups, or to the LGBTI community.

Despite supportive efforts by UNFPA, the quality of SSC data on recipients and services is not strong. Data was not collected uniformly across all the SSCs: for example, sometimes the recipient count was households, other times it was individuals; sometimes the data represented unique beneficiaries, other times it counted service delivery events when the same person received multiple services; and there were some very erratic numbers in the data that suggest widely different interpretations of what constituted a 'service'.

[253] KIIs.
[254] The legal foundation for this is provided in the LFIP Article 30-2: 'For those who are in need among the foreigners within the scope of this Regulation, access to social services shall be provided according to the principles and procedures set forth by the Ministry of Interior and the Ministry of Family and Social Policies.' However, UNFPA correspondence with the Commission explains that there was no record or anecdotal evidence of refugees being assisted by SSCs prior to the UNFPA project.
[255] The provinces were selected based upon refugee populations and the presence of UNFPA-supported WGSS, with which the project intended to develop synergies.
[256] The three mobile units were commissioned in late 2020, but to date only seem to have been used to respond to the January 2020 earthquakes in Elazig and Malatya.
[257] Al-Azar, Rima. et al. (2020). UNFPA evaluation of 'Improving access of most vulnerable refugees to social services in Turkey. DARA
[258] SSCs also provide support to the elderly, but there are few elderly in the refugee population requiring support and that are not already supported as disabled.

According to UNFPA project documents, the project had 233,991 unique beneficiaries[259]. It appears that this represents the number of individuals who were referred to MoFLSS for assessment (self-referred, or referred by other agencies most frequently PDMM protection desks), not people who were assessed or received a service. Data on services provided shows that 81,000 people received a service (see Figure 23, UNFPA reports that these are unique beneficiaries)[260], and to this number could be added a number of participants in information sessions and engaged through outreach visits[261].

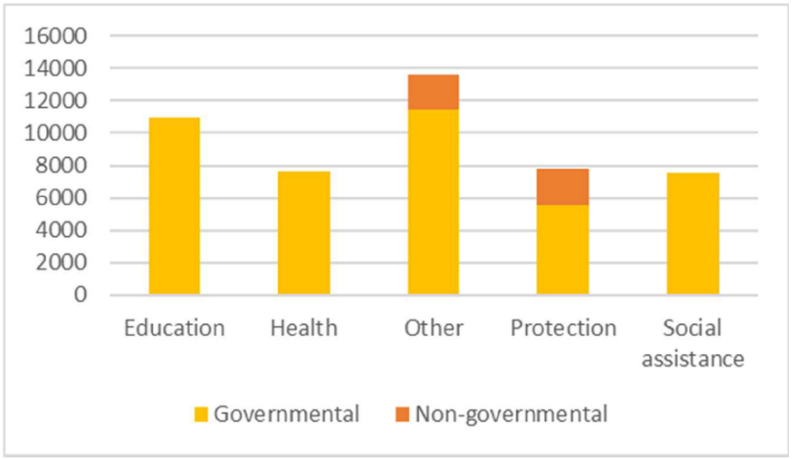
Figure 23 Services provided by MoFLSS SSCs to refugees and the host community

Legal counselling	949
PSS counselling	19,722
Information counselling	44,563
Referral	34,855
Socio-economic assistance	4,363
GBV case management	1,507
GBV PSS counselling	1,163
GBV Legal counselling	546
GBV Referral	1,629
GBV Care by institution/shelter	170
COVID-19 PSS counselling	85
Total	**86,151**

a. Social Service Centre referrals

From a government point of view, MoFLSS was the destination for referrals on all refugee problems that were not related to registration, health, education or the police. MoFLSS is the government portal for refugees to reach ESSN (through the SASFs), and all other counselling and social assistance services. But MoFLSS also referred cases outwards. Like the TRCS community centres, an SSC was a sort of crossroads where cases came in and could either be handled internally or redirected to another destination. Figure 24 shows the approximate distribution of outward referrals, and shows the further breakdown of the 'other' category in Figure 25.

Figure 24 SSC outward referrals (graphic from UNFPA project external evaluation)



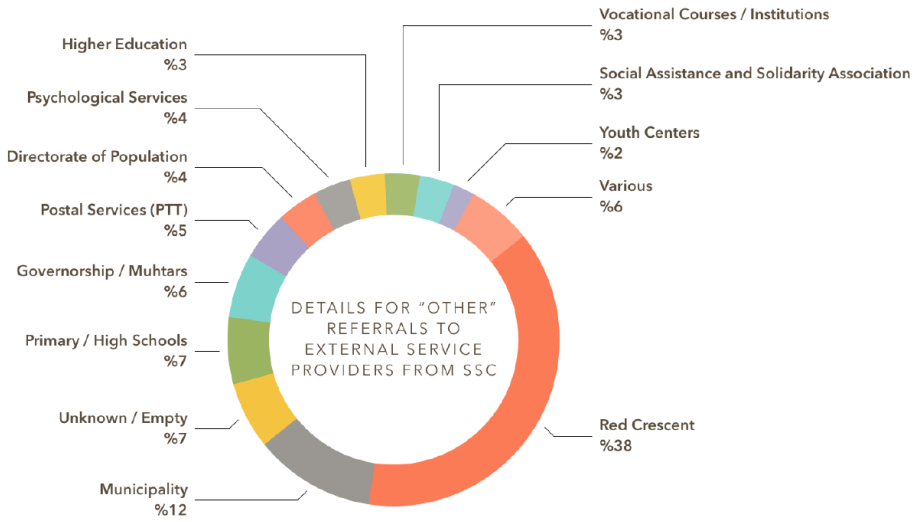
What these two figures demonstrate is that education, health and registration were the three main categories of external referral (as with TRCS, see Figure 25 below), and that SSCs referred few cases to NGOs[262]. TRCS was the largest category of 'other' referrals (demonstrating the closeness of that relationship and the scale of TRCS services). There is no data on the quantity and quality of services received by refugees after referral from SSCs.

b. Strengths of Social Service Centres

SSCs could provide some information and counselling services even if refugees were unregistered, and if an unregistered refugee needed assistance beyond this, then the SSC could refer refugees to PDMM

[259] Data provided by the Commission following submission of the final project report.
[260] The evaluation team feels compelled to observe that the data behind this table has some severe anomalies: for example, 60% of all GBV 'case management' cases were in one of 27 SSCs, and in another example, one of two SSCs in Hatay made 6,266 referrals but the other only made 130 – suggesting widely different interpretations of reporting criteria.
[261] See for data on the information session participants of the UNFPA project, noting that the number of session participants in Table 8 is larger than 81,000 because many refugees were counted multiple times when they attended several sessions.
[262] KIIs. However, from field visits conducted in 2019 during the evaluation of the EU's humanitarian programme, the evaluation team learned that some SSCs will refer refugees to local charities and NGOs for in-kind assistance such as used clothing and hygiene items, and for types of assistance such as emergency rent relief that are not provided by TRCS or state agencies.

Figure 25 Breakdown of the 'other referrals' from SSCs



accompanied by a 'service mediator' (typically an educated refugee hired by the project, with Turkish language skills and knowledge of the Turkish system). Registration was absolutely required for an SSC to make a financial payment to a refugee or to admit a refugee to a government programme (such as a women's shelter, disability support or the child foster system)[263]. Child protection was an area of strength for SSCs: the needs of children are readily understood, children are highly regarded in Turkish society, and it was reported by interviewees that SSC staff sincerely wanted to help children get to school and out of bad marriages, although they were somewhat flexible and applied 'best interest' principles with child labour and early marriages when the children were older teenagers[264]. Observers felt that MoFLSS would intervene forcefully if they came across an unregistered refugee child, to get the child registered[265]. It was also reported that SSCs were better able to support refugees in smaller cities, where the refugee numbers were less and where the support and referral system was less crowded (in these locations perhaps ASAM or local charities were the only refugee support NGOs available)[266].

Finally, although SSCs provided a range of services that was in many ways similar to those provided by community centres, they did have some comparative advantages. First, they are present in more locations than any other service provider: the UNFPA project enabled 27 SSCs to open their doors to refugees and theoretically (with enough resources and political will) this access could be extended to every province and urban centre in Turkey. Second, even if the coverage, variety and quality of services was less than service providers that are specialised in refugee support such as TRCS or NGOs, SSCs are government institutions and there is some reason to be optimistic that their support for refugees could be continued after the humanitarian funding has ended[267]. Third, because of the mandated role of SSCs in the social assistance system, they are a necessary gateway to a small number of highly specialised social services, in particular for GBV survivors, child protection and orphans, and severely disabled persons. And finally, for as long as there is an ESSN programme (or an equivalent successor), then the SSCs are likely to remain an essential gateway to SASFs and cash assistance.

[263] KII.
[264] KIIs.
[265] KII.
[266] KII.
[267] The right to social assistance to those in need is provided in the LFIP Article 89 (2) and in the TPR Article 16 (1).

c. The UNFPA project to strengthen SSCs

The UNFPA project was intended to cover all refugees regardless of nationality, and some provinces with very low Syrian populations were presumably selected in order to provide more service to non-Syrians (perhaps Burdur, Kayseri, Adıyaman and Şırnak), but in the end the project only provided services to 4,362 non-Syrians. Three reasons were offered for this: (i) SSCs were not equipped to provide services in languages other than Turkish and Arabic; (ii) the SSCs were mainly located in provinces with small non-Syrian populations; and (iii) there was less likelihood that non-Syrians were registered[268].

While it was always intended that the project would include some of the host community, in particular for social cohesion activities, the proportion of host community beneficiaries increased over time, from 9% (2018) to 17% (2019) to 24% (2020). This was ascribed to (i) a shortage of Arabic speakers[269]; (ii) project staff being assigned within the SSC to other tasks[270]; and (iii) management discretion to prioritise the host community over refugees[271].

Social Service Centres

Turkey's SSCs are under-resourced in relation to their mandate and the needs, and as a result they are not able to provide service to everyone who is eligible. Broad priorities are set by law, but there is no strong strategic framework to govern priorities or to set standards. Instead, SSCs are highly responsive to central government direction and to the short-term guidance provided by the SSC Directors, who operate with considerable autonomy. The consequence of this for refugees is that the stance taken vis-à-vis refugees is highly variable from SSC to SSC (ranging from full access to the bare minimum), and services are also not standardised across SSCs, creating an unpredictable service and referral environment for external partners. In the absence of a strategic framework, the incentive is to carry out and report on activities and transactions, rather than to work towards and measure social change. – *Interviews.*

SSCs did reportedly use a case management system, by some accounts paper-based and locally handled, but this was not structured and SSCs used different methods to identify and follow up on cases. Possibly the need for a unified and connected case management system will be addressed by the proposed policy paper and the SOPs, if they are implemented by MoFLSS[272].

SSCs cannot provide costed services (i.e. referral to SONİM or cash assistance or referral to a government service provider other than DGMM) unless the refugee is registered and in-province. However, SSCs sometimes referred cases to an SSC in another province where the refugees were registered[273].

The distant relationship between government agencies (including but not limited to MoFLSS) and NGOs meant that there was little healthy exchange of cases, knowledge and ideas between these two communities, limiting the effectiveness of both. SSCs were reluctant to receive referrals from NGOs, and also referred few cases outwards to NGOs, thus cutting important links in the referral system[274]. Where there were exceptions and referrals were dynamic, this was found to be the result of effective, local personal relationships between staff from both types of organisation[275].

Finally, there was no apparent attempt or capacity to establish an online presence or telephone-based service window that could attract refugees to services, or provide services to refugees – not even after the onset of COVID-19. This was not a planned activity within the UNFPA project, but nevertheless, the future effectiveness of MoFLSS to provide services will be severely limited if these services are only

[268] Al-Azar, Rima. et al. (2020). *UNFPA evaluation of 'Improving access of most vulnerable refugees to social services in Turkey*. DARA. However, and illustrating the variability of SSCs according to the inclinations of their Directors, an SSC in Ankara provided extensive services to non-Syrians, and did so mainly by establishing a local partnership with the municipal government.
[269] KII. Also, a document provided to the evaluation team in confidence suggests that MoFLSS might be reluctant to hire foreign professionals – which would greatly increase the available pool of Arabic and Farsi speakers.
[270] KII.
[271] Refugees were fewer than 50% of project participants in two locations with high Syrian population density: Beylikdüzü/İstanbul, and İnegöl/Bursa.
[272] KIIs, and also considered a weakness in Al-Azar, Rima. et al. (2020). UNFPA evaluation of 'Improving access of most vulnerable refugees to social services in Turkey. DARA.
[273] KII.
[274] This was not the case in Istanbul, where UNHCR had helped develop a very different and more constructive relationship between UNHCR, local NGOs and PDFLSS Istanbul, such that CSOs were able to refer cases directly to PDFLSS without UNHCR intermediating: KIIs.
[275] KIIs, supported by confidential documents provided to the evaluation team.

available in-person in a somewhat formal and inflexible government setting, and the efficiency of counselling and referrals will be less than NGO service providers[276].

d. What difference did the Facility make to SSCs?

The overall picture of the SSCs is of an under-resourced and highly variable set of service providers, implementing the government's policy of supporting refugees, but without clear guidelines or results-orientation. SSCs are doing what is expected of them, in a rather traditional, inflexible and insular way. Given this, it is fair to ask what difference the Facility has made. The conclusion of the evaluation team is that the Facility has still made two very significant contributions.

First and most importantly, the SSCs have opened their doors to refugees. The policy has become practice, additional staff with Arabic language skills have been hired, a system of outreach workers ('service mediators') drawn from the educated refugee community has been built, services are being delivered to refugees by the nation's largest network of social assistance agencies, and, with this precedent now set, the prospects for continued assistance are good[277]. Even though other agencies were also supporting the SSCs (see box), it seems likely that the widespread opening up of SSCs to refugees would not have taken place without the support of UNFPA, funded by the Facility.

UNHCR support for SSCs (not Facility-funded)

In Istanbul, UNHCR supports SSCs with interpreters, social workers, vehicles and drivers. This project also features proactive support for capacity-development (called 'systems-building') including mentorship, training of trainers, and study visits to countries where these systems are well established. UNHCR and PDFLSS Istanbul have also developed an improved SSC referral system using an adapted interagency referral form, and PDFLSS Istanbul is actively leading coordination of social assistance with other actors. It seems that there is a strong and multi-dimensional cooperation in the Istanbul region, with very few international agencies involved.
– UNHCR interviews

Second, SSC staff have achieved a whole new level of awareness, understanding and capacity in three areas: the value of outreach, the special needs of refugees, and the importance of social cohesion. The capacity-building job is not yet finished, but a good start was made thanks to the high quality of training and follow-up coaching provided by the Facility[278].

e. Lessons learned for the Facility from working with the SSCs

From interviews with UNFPA and other actors (but unfortunately not interviews with MoFLSS), and supported by the review of project documents, the evaluation team has extracted four lessons that might merit consideration by the Facility as it moves forward to a new relationship with the SSCs.

1. To some extent the short-term project duration of the Commission's humanitarian activities are not well-suited to the slow and patient work of building capacity of a government ministry. There has been some success in capacity-building, but it was not always understood the same way by all parties, and a mismatch of expectations led to some frustrations on all sides.
2. While service delivery has taken hold within the SSCs, there are still some ways that protection could have been better mainstreamed. Indicators of this are the low numbers of non-Syrians in the beneficiary population, the lack of incentives to find ways to include and support unregistered refugees, the low priority placed upon proactive outreach through mobile units, the unsystematic approach to case management (including little evidence of following up referrals through to problem solution), and the limited range of services provided (in particular little PSS, or support for socially marginalised populations).
3. There is a risk that some of the achievements of the UNFPA project will not be sustained when the support transitions over to a direct grant to MoFLSS. This transition is still in process, but as of mid-2020 it was not certain that the UNFPA work on policies, SOPs and Training of Trainer modules would be implemented by MoFLSS. There was also no guarantee that the staff who had been

[276] The same observation and related recommendations were made by Al-Azar, Rima, et al. (2020). *UNFPA evaluation of 'Improving access of most vulnerable refugees to social services in Turkey*. DARA.
[277] KIIs.
[278] KIIs., confirmed by Al-Azar, Rima, et al. (2020). *UNFPA evaluation of 'Improving access of most vulnerable refugees to social services in Turkey*. DARA and especially by the online survey conducted during the UNFPA evaluation.

trained up by the UNFPA project would be retained by MoFLSS[279], or that the outreach services would continue (especially not those that relied upon the 'service mediators' recruited from the refugee community or on the mobile units). All in all, it seems possible that there could be significant break in continuity between the Tranche I project with UNFPA, and the Tranche II direct grant.

4. Finally, interviews suggest that the approach to protection will change, understandably, as concepts of 'social protection' that are more consistent with the mandates of the EU's development assistance and MoFLSS replace the more humanitarian emphasis provided by the earlier UNFPA project. If the Facility wishes to encourage the new direct grant to mainstream protection (for example addressing the needs of non-Syrians within the framework of the EU's 'one refugee policy,' including unregistered refugees, and reaching socially marginalised populations) then the findings and recommendations from the UNFPA project evaluation suggest some factors to consider, and the Facility could also draw on UNHCR's experience in building a different kind of relationship with PDFLSS in the Marmara region, as well as the expert advice of the Facility's humanitarian team.

iii. Community centres (TRCS and NGOs)

Facility partners who were operating community centres or service centres nearly all included some component of referral to specialised protection services. A few Facility protection partners were highly specialised in providing services to 'niche' populations at particular risk, including LGBTI refugees, refugees in detention, and SAWs (often Dom)[280]. In this section we will examine more closely two organisations that were targets for this evaluation: TRCS and ASAM. Other organisations are discussed in Section 3.3.3 in the context of services to refugee groups with special needs.

a. Turkish Red Crescent Society

The Facility supported TRCS through three projects and two different instruments, each quite different in character. Since they were spread over time, they illustrate the evolution in the Facility from its beginnings to the present.

The first project, ECHO/SYR/BUD/2016/91017, was financed by the Commission from the 2016 Syria Humanitarian Implementation Plan (before a separate Turkey HIP was created) and is a pre-Facility project in its concept. The proposal to the Commission was for EUR 60 million for a comprehensive programme of in-kind and cash assistance to Syrian refugees in and outside camps, and for the establishment of a community centre in Istanbul. The Commission removed the cash components that might overlap or compete with the ESSN (in the design process at that time), removed some classic relief activities such as a hot kitchen in Ankara, removed support to camps (as the Commission's humanitarian strategic goal was already to focus on refugees outside camps), and the project finally consisted of EUR 8 million of in-kind support to refugees in urban areas and the creation of the Bagcilar Community Centre in Istanbul. The in-kind assistance was delivered to 170,000 refugees in 18 locations across the country; the community centre was set up with core costs covered and 19 staff positions, providing services in the project period to 8,981 refugees (against a target number of 1,500).

The second project was very different. EUTF Madad project TF-EUTF MADAD/2017/T04.30 was a regional Red Cross initiative (coordinated by the Danish Red Cross) covering five countries and with a total budget of EUR 53 million, which has also been extended in time due to slow implementation. The Turkey component was more than half of the total, and had disbursed EUR 18 million (56% of all disbursements to date) by the end of Q1 2020. The core of the Turkey component was support for the establishment and operation of 10 TRCS community centres, with additional amounts for physical assistance. This project was importantly different from the Commission's humanitarian project in its multi-year character, its flexibility, and its responsiveness to TRCS priorities[281], all of which were enabled by the more flexible guidelines governing EUTF Madad. In contrast, the Commission–IFRC–TRCS relationship, governed by the Commission's humanitarian regulations, was felt to be more formal, directive and less flexible[282].

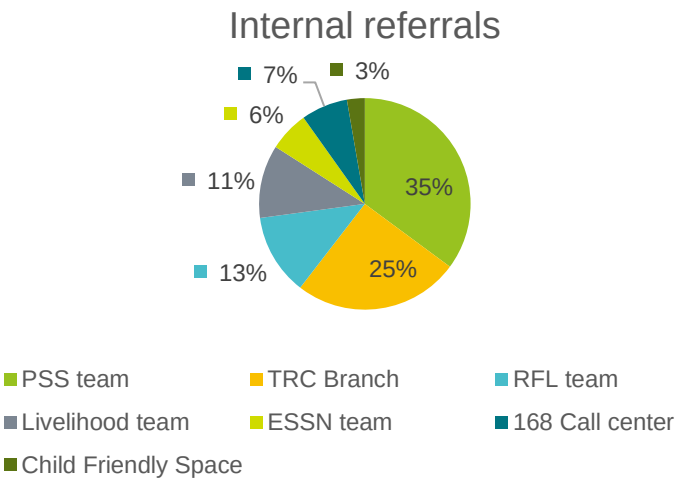
[279] The evaluation team was informed that this was not due to lack of desire for continuity, but rather due to human resource policies of the GoTR which discourage the hiring of temporary contract staff for regular staff positions. Instead, the team was informed that the former UNFPA contract staff would be encouraged to apply for employee positions with MoFLSS.
[280] ECHO Quarterly reporting; ECHO project documents (eSingleforms and Fichops) for all protection partners.
[281] KIIs.
[282] KIIs.

The third project was ECHO/TUR/BUD/2017/91008. The agreement was signed for EUR 7.3 million but by the end of the project (and after the maximum allowable extensions) only EUR 6.3 million had been disbursed. The project funded the staff, training and resources for all 16 TRCS community centres to have a protection unit providing refugee information sessions on their rights and obligations, counselling, and CM/IPA (see Section 3.3.3 (i) below). It essentially added a protection function to the community centres whose range of activities to that point included relief assistance, social and life skills classes, Turkish language training and social cohesion (financed by EUTF Madad) and child protection activities (funded by UNICEF).

While the protection units functioned relatively well[283], project implementation was very slow – ascribed by TRCS and the Commission to problems with identifying, recruiting and retaining the specialised staff required. Recruitment was indeed a challenge, and at least one interlocutor suggested that recruitment was slowed by the fact that TRCS followed government-like processes to identify, screen and recruit staff. But the evaluation team's assessment is that, from the start, TRCS was somewhat hesitant to take direction from the EU. Review of project documents (especially correspondence) and interviews[284] reveal something of a tension between the core, traditional and well-established work of the Red Cross/Red Crescent movement in Turkey. This can take the form of in-kind and cash humanitarian relief to whoever needs it – regardless of their refugee or citizenship status – family tracing and reunion after a disaster, first aid training etc., and the more focused 'humanitarian protection' goals of the Commission, which came with the baggage of rigid beneficiary selection criteria and prescribed modes of assistance (see Section 3.3.2 (iv) below). TRCS did want to expand its work into protection and entered into its agreements with the Commission willingly, but to qualify for that expansion TRCS had to make a number of compromises, in terms of limiting its activities and client groups, that did not always sit comfortably with its traditions. The evaluation team's conclusion is that this adjustment took time, and that was a further cause of delayed implementation.

Despite this slow start, several interviewees agreed that, by 2020 and thanks to the Facility, TRCS has greatly increased its understanding of protection and assumed a central role in the system of referral and protection services in Turkey[285]. The 16 TRCS community centres are each a bit different and shaped to their local social and economic context[286], but they all provide a common core set of services in protection, livelihoods, social inclusion and health including PSS[287]. The range of TRCS' internal protection services is well illustrated by data from TRCS for the period mid-2019 to mid-2020 provided to the evaluation team (see Figure 26).

Figure 26 TRC internal referrals from mid-2019 to mid-2020



From the viewpoint of protection referrals and services, TRCS community centres have a number of comparative advantages:

a. TRCS is well-connected to government, and as such is more effective as a source of referrals to all government institutions[288]. Some TRCS staff are certified as social workers and work closely with their local SSCs such that they have the authority to sign MoFLSS social assessment

[283] Monitoring reports by the Commission, KIIs.
[284] KIIs.
[285] KIIs.
[286] KII.
[287] KIIs.
[288] KIIs.

reports that allow needy cases to access government social support such as women's shelters (*SONIM*)[289]. To illustrate the close ties to DGMM, in at least one location (Kayseri), TRCS set up a tent outside the PDMM verification centre to provide outreach services to refugees entering or leaving PDMM[290] (identified by SUMAF as a good practice). In another example, TRCS was able to work closely with PDMM Istanbul to support orderly management of the relocation of Syrian refugees from Istanbul after the 2019 Istanbul policy decision on removals[291].

b. TRCS has more operating space. Stemming from their relationship of trust with the authorities, TRCS made efforts to reach out to unregistered (especially Syrian) refugees, with mobile teams and deliberate outreach activities. Outside government, only TRCS seems to have the capacity and permission for outreach[292].
c. TRCS has scale and reach. The community centres are well-known to local stakeholders, and their Red Cross/Red Crescent branding helps refugees to find and trust them quickly[293]. Furthermore, TRCS can call on a large network of volunteers and university clubs, and they have 400 TRCS Branches throughout the country that can serve as sources for support (including financial support if, at some time in the future, external funding for refugees reduces)[294].
d. Finally, because of the role TRCS plays in other Facility programmes, TRCS community centres are at the centre of a referral system that can provide a number of services in-house, but that can also refer them to ESSN and CCTE[295]. TRCS service referrals work both ways: TRCS outreach workers (from the community centre, ESSN or CCTE outreach teams) identify refugees in the community with special needs, and refer them to the community centre for assessment and support. Within the community centre a case might obtain several services, and then also be referred onwards for a government service or exceptionally another NGO service[296]. In sum, TRCS' 16 refugee community centres, government ties and embedded role within ESSN and CCTE give TRCS the largest number and variety of referral options.

However, because TRCS was guided (by both GoTR and the EU) to focus on Syrians, they are only providing this full range of service in 15 provinces with high Syrian populations. Outside of these, TRCS does not have such established relationships with PDMMs and SSCs, and the effectiveness of referrals might be less[297].

Over the life of the Facility, as TRCS has become more experienced and as the refugee population has become more settled, there has been a clear development in the nature of services offered by community centres. An initial focus on basic information and distribution of non-food items (and in some locations even basic health services) has evolved into more sophisticated protection counselling and legal assistance[298], while classes in life skills (sewing, handicrafts, cooking, computer literacy) have changed focus to the skills needed by the labour market, and related skills such as job-search strategies and interview tips. Over time, what was initially a general range of relief services has narrowed down to two sets of longer-term structural needs for refugees: protection and employment.

> 'We could observe the changing needs. We restructured our courses towards improving livelihoods and vocational course, social cohesion, improving their employment. We also observed increases in protection cases. After getting familiar with them and referring them for basic issues such as registration, they started to trust us and started telling their problems. They came to us with problems such as child abuse, child marriage, legal problems, unaccompanied children. We then shifted our focus to protection because of these increasing protection cases. In the beginning, we had social cohesion and livelihood programmes but they did not have an employment focus.'
> – *TRCS community centre manager*

[289] KII.
[290] KII.
[291] KII, TRCS project reports.
[292] KIIs.
[293] KIIs.
[294] KIIs.
[295] KIIs.
[296] KIIs.
[297] KIIs.
[298] One TRCS community centre in a region with many SAWs also noted strong seasonal cycles of counselling and assistance: especially an annual education cycle, and an annual employment and unemployment cycle related to agriculture.

Because of TRCS' access to government and the extent of its referral network, its community centres are probably more effective than NGOs at resolving most of the problems presented by refugees. However, EU staff felt that because TRCS is somewhat formal and bureaucratic, more 'government-like' than national non-governmental organisations (NNGO) like ASAM, then TRCS is less flexible and agile, less able adapt quickly to changing circumstances, and less ready to take the risk of addressing protection needs that fall outside the mainstream. [299]

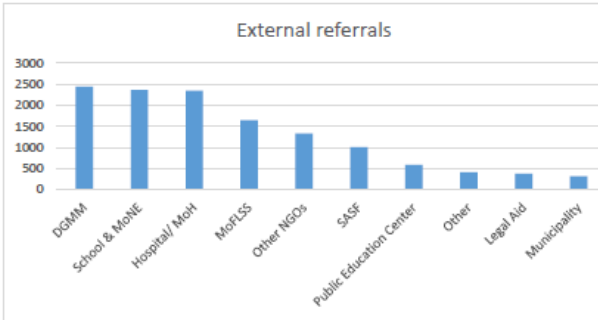
Figure 27 Referrals reported by TRC in 2017

Education:	32%
Health:	20%
Safety and security:	8%
Shelter:	7%
Disability:	6%
Employment:	5%
Legal aid:	4%
Food:	2%

Regarding referrals, it is possible to look at TRCS reports from two different points in time, and see the changes in the character of referrals (the two reports did not use the same reporting parameters, but the evolution is still evident). The Final Report of the first Commission project recorded the list of referrals shown in Figure 27.

In comparison, a much later report provided to the evaluation team by TRCS covering mid-2019 to mid-2020 shows the breakdown of TRCS referrals in that period (Figure 28). Looking at the two figures, a number of government service providers were available in 2019 that were not available in 2017 (MoFLSS for GBV, disability and child protection services, SASF for access to ESSN), and it also seems that registration was not a problem area in 2017 (DGMM was already created but registration and inter-provincial transfers were at that time more straightforward).

Figure 28 Referrals reported by TRC in 2019–2020



As with PDMM and MoFLSS, TRCS does not report to the Facility on the outcomes of these referrals: this data is not tracked systematically and is also not a required reporting parameter. There is, however, some evidence on referral outcomes. The 2020 endline report of third TRCS project (Commission support for the scaling-up of the protection function in all 16 community centres) found that 47% of beneficiaries had their protection problems fully resolved[300].

From a contribution viewpoint, there are two main conclusions regarding the Facility's support for refugee access to protection services through TRCS. First, the Facility was an important actor in recognising and then cementing the unique bridging role of TRCS in the system of refugee referral and assistance. This bridging role was created by TRCS itself and powered by the support of the government, but it was given greater weight when the Facility funded ESSN (where WFP partnered with TRCS), CCTE (where UNICEF partnered with TRCS), and then also directly funded TRCS community centres. The combination of these three vectors of support for TRCS established TRCS as the major non-governmental service provider and conductor of protection and service referrals in Turkey[301]. Second, the two types of direct Facility support acted in a complementary way to enhance TRCS capacity to conduct those referrals. The main effect of the first Commission humanitarian project and the development project implemented by EUTF Madad was to extend the reach and scale of TRCS services and referrals by providing the core support to 11 of TRCS' 16 community centres. And the main effect of the Commission's humanitarian support, in the second project, was to develop the protection function across all TRCS 16 community centres. Simply put, funds from EUTF Madad expanded TRCS service coverage, and the Commission provided TRCS protection depth.

[299] Interviews with EU staff.
[300] UDA Consulting. (2020). *Responding to protection needs of refugees in Turkey – endline data collection and comparative analysis,* TRC, Ankara. The endline survey covered 419 TRCS community centre beneficiaries in five provinces: 407 Syrians and 12 non-Syrians
[301] KII described community centres and especially TRCS as the 'connector' between different Facility programmes, and the 'bridge' between the Facility's development and humanitarian arms.

b. Non-governmental organisations

According to the agreed Inception Report for this evaluation, INGOs providing protection services[302] were not examined closely in this evaluation, since their performance in delivering protection services had already been considered in the course of the earlier evaluation of the EU's humanitarian programme in Turkey[303]. The main relevant points of this earlier evaluation are summarised below.

The shifts in GoTR policy[304] during the first phase of the Facility triggered shifts in the opportunities for NGOs (more referrals to government services) and also in the operating space for NGOs (limitations on outreach and direct service delivery):

> *During the [Facility Tranche I] period there was a clear policy decision by the government to include refugees in state-run services based upon their registration, which shifted a lot of emphasis towards processes of registration and validation, and providing counselling and referral support to refugees who were not registered for any reason, or not able to access services because they were not living in their province of registration. The Commission's direct protection activities also evolved in this period, as some INGOs and National NGOs (NNGOs) were asked to cease their activities after the attempted coup d'état in 2016, and from 2017 restrictions were placed upon the ability of INGOs to conduct household visits and to undertake case management. As reflected in the HIPs, from 2017 onwards INGOs reduced their direct protection services to refugees (i.e. GBV and PSS counselling, child-friendly spaces) and increased their emphasis on referral of refugees to government services [305].*

INGO referrals to government services were difficult and rarely provided feedback on the resolution of cases:

> *a combination of privacy regulations and weak information management systems mean that there is limited information on the quality of services actually received by refugees from government providers. The evaluation team was informed that, in many locations, government service providers were less responsive to NGO referrals, and that refugees had reported back anecdotally that some services were not fully available to refugees because of supply constraints (unavailability of supplementary assistance for the partially disabled, limited classroom places, lack of facilities in remote locations, or simply absence of an appropriate service) [306].*

While INGOs in Turkey did their best to provide protection services, the limitations on the operating environment rendered this work less efficient:

> *the NGO protection service delivery model in Turkey is premised upon a 'classic' (pre-2016) package where an INGO assesses protection vulnerabilities in a community in order to plan an intervention, conducts outreach to identify specific households or individuals at risk, provides counselling and psycho-social support either through a mobile team or on-site in a community centre, provides targeted financial support to allow a refugee to obtain a specific protection outcome, helps beneficiaries access specialised protection service providers (through referral, accompaniment or interpreter support), and follows up with the beneficiary. Unfortunately, several aspects of the 'classic' model could not work as intended, and were described by one stakeholder as 'being asked to deliver the undeliverable'.*
>
> *Given that NGOs for the most part (there are some exceptions) are prevented by regulation from conducting household visits in order to assess needs, that they are not licensed to provide advanced or individual psychological counselling, and that official entities do not consistently accept referrals from NGOs, then the only parts of the model that can operate normally in Turkey are the provision of individual legal counselling and group psycho-social support to*

[302] Given the depth of the Turkish NGO sector, most INGOs were the agreement-holders with the Commission, as required by Commission regulations, but then implemented through local NGO partners.
[303] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU.
[304] Decisions that increased refugee access to government services were the decisions to re-register and verify refugees, to implement ESSN and CCTE through government systems, to include refugees in the Turkish education system, and to open up MoFLSS SSCs to refugees.
[305] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU. p. 7.
[306] Ibid. p. 32.

refugees who 'walk in,' the supply of individual protection assistance to those who qualify, and an attempt at service referral. And yet, there is inefficiency in the fact that these few components do not work as well without the rest of the package.[307]

The overall conclusion of the EU's earlier humanitarian evaluation was that INGOs had provided a high quality of service to refugees[308], and importantly had done better at including unregistered refugees, but that their scope had been limited first of all by the requirement that they operate out of a relatively small number of physical community centres (without the possibility to undertake outreach), and only in provinces with large Syrian populations[309]. Furthermore, the range of services they could offer was limited by regulatory restrictions (i.e. limitations on the delivery of advanced PSS services, GBV response and legal aid). INGOs were an important part of the referral ecosystem, but were not allowed to fulfil their potential. The humanitarian evaluation did, however, recommend that the Commission should

maintain in the second phase of the Facility, and after the Facility, support for NGO partners providing targeted protection services for refugees who either cannot access government services (i.e. unregistered or out of province or socially excluded groups), or who have specialised legal needs (i.e. detainees, stateless persons, civil documentation difficulties, survivors of domestic or gender-based violence requiring special assistance).

c. ASAM

Several NNGOs were supported by the Facility as sub-contractors of INGOs and especially as partners of UNHCR[310]. However, only ASAM received direct support from the Facility, through EUTF Madad project TF-EUTF MADAD/ 2017.T04.56. This project lasted 28 months, received a total of EUR 8.7 million, and provided funding for office costs, staff salaries for community centres and the hotline, transport (for outreach) and cash for refugees with special needs. The project extended the reach of ASAM (and of the Facility) into six new non-Syrian provinces where ASAM did not previously have an office (most of ASAM's offices are supported by UNHCR), and planned to provide mobile services to a further 21 provinces[311].

ASAM as a service provider and advocate

'Under the MADAD project, we were providing protection services for education, health and economic needs. We are close to the PDMM building and were providing counselling services for registration, documentation etc. We were referring people to schools for school registration or to hospitals. We had a budget for medical needs. We were providing support for the special needs of the disabled. We had a psychologist conducting group and individual sessions. We were also providing legal counselling sessions. We were supporting people to write a petition to change their registered provinces, for instance. If people came to us with a security concern, we accompanied them to police offices or the public prosecutor'

– ASAM interview

The ASAM project stood out in the Facility portfolio as reaching out to provide protection services to non-Syrians in remote provinces where there were no other NGO service providers, and it was strongly supported by the Commission's humanitarian team. In its implementation it was governed by the relatively flexible project management and financial guidelines of the Trust Fund, and for this reason was marked by long-term planning, agility and a concern for capacity development that are not easily allowed by the Commission's humanitarian regulations. The project experienced many challenges and sustainability is a major concern, but all things considered this was assessed by several stakeholders[312] and by the evaluation team as being one of the better-performing and most cost-effective protection interventions of the Facility. In particular,

[307] Ibid. p. 37.
[308] See also the discussion below about Case Management and Individual Protection Assistance.
[309] This was a requirement imposed upon INGOs by the Commission, which played a major role in directing the distribution of INGO partners to ensure maximum coverage of Syrians, although the final distribution was determined by government approval of operating permits.
[310] A very important Commission project with the *Deutsche Gesellschaft Für Internationale Zusammenarbeit* (GIZ) (LIFT) co-financed by BMZ (The Federal Ministry for Economic Cooperation and Development – Germany) is supporting a large number of local CSOs and at least one municipal government to get engaged with refugees and to be introduced to the challenges of external donor funding. This project adds diversity and reach, provides protection services and supports social cohesion by working with refugees and host communities. The Commission funding for refugee protection was complemented by funding from other donors for host communities and capacity-building. This project was not assessed as it is funded under Facility Tranche II, but it needs to be noted as an important evolution in Facility programming in the direction of building local NGO and municipal capacities.
[311] A second EUTF-Madad project TF-MADA/2018/T04.170 was launched in 2019 and, as it is considered as a Facility Tranche II project, it was beyond the scope of this evaluation.
[312] KIIs.

ASAM was well regarded for reaching unregistered refugees, and for its commitment to protection results despite external factors beyond its control (limitation on outreach, handover of non-Syrian registration to DGMM, handover of the hotline to UNHCR, and COVID-19). In many ways TRCS and ASAM were complementary to each other: TRCS providing more mainstream services with good government connections and a Syrian emphasis, and ASAM providing services to more marginalised populations and non-Syrians. In those provinces where ASAM and TRCS were both present, then ASAM services were reported to be fading[313]. However, in provinces with no TRCS community centre, ASAM was usually the only non-government service provider, and in these locations there were sometimes better referrals from municipalities and PDFLSS to and from ASAM.

To deliver services, ASAM worked together with another local NGO partner 'Refugee Support Centre' to operate six relatively lean service centres (four larger 'Sustainable Living Centres' and two smaller 'field offices') providing a combination of awareness-raising, counselling and referral services (with special links to the Ministry of Health and UTBA for legal aid), training for local media and government officials, cash assistance (7,005 beneficiaries), language and life skills classes (see box), social cohesion activities including extensive media briefings, and, until July 2019, the operation of a busy refugee hotline (averaging 2,200 calls/month).

Turkish language is protection

'We highly believe in the importance of teaching the language in order to enable them to go to a hospital and talk about their health problems or go to school and discuss their children's progress on their own. For this reason, the language course is not only related to social cohesion. It is also related to protection'
– ASAM community centre manager

ASAM was heavily affected by the MoFLSS decision to limit outreach, and unfortunately was obliged to close its mobile units after a few months (mid-2018)[314]. Subsequently, after MoFLSS centralised operating permits to the national level, ASAM applied for permission to continue operations in the field, and as of mid-2020 was still awaiting a decision on their application[315]. Several observers remarked on the quality and commitment of ASAM staff[316], and in particular on the leadership skills of their office managers. ASAM has a highly decentralised management structure which has served them well. Even though ASAM has not yet obtained a country-wide protocol from MoFLSS, they have been able to sustain local relationships with PDFLSS and have been allowed to continue working with this implicit local approval. In the end, ASAM community centre managers are above all relationship managers, and local connections are possible when national ones are difficult[317].

The referral data provided in the ASAM Final Report is not very clear about unique beneficiaries, because referral data is repeated several times as referrals from the hotline or from the community centres, and to cash support or to government agencies. But there is no doubt that ASAM is very active in its referrals[318]. As far as the evaluation team can determine (seeking data comparable to TRCS), through this project ASAM referred 6,219 beneficiaries to government services [3,582 female, 2,623 male, 14 other] [5,031 adults, 1,188 children], [2,807 Iraqi, 2,306 Afghan, 660 Iranian, 339 Syrian, 107 other]. ASAM stated to the evaluation team that they do capture data on the destinations of referrals and on the completion of services after referral (much lower than the number of referrals)[319], and this was confirmed by interviews[320], although that data was not available to the evaluation team.

ASAM as a linking agency

'We became a mediator between different institutions. PDMM focuses on documents and does not have enough staff capacity. Other institutions do not have knowledge about legal rights and frameworks for refugees in Turkey … PDMM asked us to support them with our translators. They also asked to participate in our social cohesion activities. Their staff was not mobile and we were supporting them to accompany children to a hospital' – *ASAM interview*

[313] KII.
[314] KII, and ASAM. (2020). Final Report of project TF-MADA/2017.T04.56, Ankara.
[315] As of mid-2020, most (possibly all) NGOs are continuing their operations while awaiting a final decision from Ankara on their operating permits. This placed the NGOs and their employees in a very insecure position.
[316] KIIs.
[317] KIIs.
[318] KII.
[319] The referral data in ASAM. (2020). *Final Report of project TF-MADA/2017.T04.56*, Ankara. is not very clear, but it seems to suggest that around 3% of cases referred by ASAM to government received a satisfactory/full service (211 cases out of 6,219 referrals)
[320] KIIs, including with ASAM community centre managers.

From a contribution viewpoint, the ASAM project did not open up a new frontier, since ASAM was already working in many non-Syrian provinces with the support of UNHCR and other donors (altogether ASAM has 17 projects with approximately 2,000 staff nationwide and at any one time about 70 offices and community centres). However, it did amplify the services available to non-Syrian refugees, provided to the Facility its main window into the problems and priorities of non-Syrians.

iv. The Facility's proportion of overall funding to protection services

The evaluation team was not able to derive a useful estimate of the weight of Facility funding for protection services, in relation to other donors. However, the Facility was the major (sometimes only) donor to several key protection programmes: PDMM protection desks, MoFLSS SSCs (except for the SSCs in the Marmara region supported by UNHCR) and the TRCS protection units. Only the NGO service providers seem to have been funded by several donors alongside the Facility, including the INGOs, TRCS community centres, ASAM and NNGO partners of UNHCR.

3.3.3. Contextual analysis of Facility interventions supporting access to protection

This section contains a contextualised analysis of how some of the support provided through the Facility deliberately sought to strengthen access to specialised protection services. This begins with an examination of two activities of the Facility that aimed at opening up access and improving the quantity and quality of referrals (CM/IPA, and the referral functions of the Facility's other major programmes in Tranche I). The analysis then examines opposing contextual factors, considering a number of protection risks and vulnerable groups that were difficult to address in the Turkey context, and how effectively the Facility overcame those obstacles. Finally, the contextual analysis reflects on those external factors that have influenced access to protection services, independently of the EU's efforts.

i. Facility support for access to protection services and additional contributing factors

a. Case management and individual protection assistance

Prior to the ESSN, several Facility partners including NGO community centres provided cash to refugees with special needs. In most cases this was called a special needs fund (SNF), and it worked in a similar way to cash grants for basic needs provided by other donors to their partners. However, as planning was advancing for the creation of ESSN, the Commission decided that they would clearly differentiate between cash to meet basic needs (which would henceforth be provided by ESSN) and cash provided outside the ESSN which would be sharply focused upon protection. Creating the new 'protection cash' mechanism took 2 months, and it is now used by all the Commission's humanitarian protection partners[321]. CM/IPA has advantages and disadvantages (as we discuss below), but the key point to note is that by creating CM/IPA the Facility created a Turkey-specific mechanism to provide protection support to the most vulnerable refugees: it enabled a sharper focus on protection in a universe where the needs were far greater than resources available, and priorities had to be set.

CM/IPA is a two-track system where complex cases are supported over time and multiple types or rounds of support through case management. Complex cases are defined as

> *prevention of and response to violence (including GBV); response to the exclusion and specific needs of LGBTI refugees; response to child protection violations, including violence, abuse and neglect; support to unaccompanied or separated children, including alternative care placement; response to children associated with armed forces and armed groups; response to family tracing and reunification requests; response to detention situations (including judicial procedures and appeals); response to physical protection needs of individuals (including relocations, changes of satellite cities); and long-term support for psycho-social and medical needs or situations of disability*[322].

In the second track, specific time-bound protection needs are met by a one-time support (IPA) defined as

[321] KII.
[322] Standard Operating Procedures for Individual Protection Assistance.

accompaniment, transportation, translation (verbal/in-person or written), accommodation; rent assistance (in cash); shelter assistance (in cash or in-kind); assistive device (inside or outside Government of Turkey coverage, as prescribed by medical specialist); core relief items (in cash or in-kind); document issuing fees (ex. Notary); legal counselling (not legal assistance/aid); medical treatment (inside or outside Government of Turkey coverage, as prescribed by medical specialist); protection information counselling (including for self-referral); referral (internal/external; state service provider/humanitarian service provider); and unrestricted cash to meet urgent immediate needs (one-off or time-bound)[323].

Convinced by the protection value of this system, from the 2017 HIP onwards the Commission required all partners to convert to CM/IPA if they wanted to use Facility funding for cash support outside the context of ESSN and CCTE.

In 2019, the EC commissioned a study to consider how well the CM/IPA system was working. The study gathered data from six Commission-supported organisations including TRCS, and examined what had happened to 4,972 closed cases[324]. 74% of the cases were from the south-east (reflecting the IP location bias), 75% of cases were IPA and 25% were CM. In terms of demographics, coverage was about even between male and female beneficiaries, 50% of cases were children, very few cases (<5%) were persons aged over 60, 15% of the adult cases were illiterate or had no education, 8% had a disability. 60% of the GBV cases were female and 40% were male[325].

What the study found was that in 87% of cases the main protection issue was a denial of resources or essential services, of which the single largest problem (22%) was civil/legal documentation. Of all cases in the study (recall that these are only resolved cases) 29% had no valid registration, 9% had registration but were out-of-province, and 3% were pending registration. The study also provided data on the different uses of CM vs IPA This study is the only dataset the evaluation team could find with this much detail (see Tables 14 and 15)[326].

Table 14 Types of action in individual protection assistance

Actions Taken	% of all IPA actions
Transportation	16.70%
PDMM registration	13.77%
Basic needs support	11.80%
Shelter assistance, cash	10.03%
Translation, in person	9.95%
ESSN	6.04%
Health services	4.59%
NO INFO	3.12%
Shelter/WASH	2.49%
Accompaniment	2.30%
School registration	1.89%

Table 15 Types of action in case management

Actions Taken	% of all CM actions
PDMM registration	17.16%
Transportation	16.53%
Basic needs support	8.54%
Shelter assistance, cash	7.28%
Translation, in person	6.47%
MHPSS services	4.99%
School registration	4.58%
Health services	4.54%
Accompaniment	3.95%
Legal services	3.41%

The study's main criticism of the CM/IPA was that complex cases took too long to close:

when examining the average amount of time from assessment to closure, 14.40% of cases are closed within a year, compared to 37.29% of child marriage cases, 18.24% of child labour cases and 21.78% of gender-based violence cases were closed within a year. This shows that given the complexity and additional needs required to address complex and critical cases, the case management and IPA system is unable to expedite the process. The protection response, including all key stakeholders, is unable to make the process nimble enough to prioritise the most vulnerable[327].

[323] Standard Operating Procedures for Individual Protection Assistance.
[324] *ECHO Partners CM/IPA Data Review*, CARE, 2019 (internal study commissioned by ECHO).
[325] The incidence of GBV against men, some of which was trauma carried over from Syria, was a weak spot for the SSCs, which are organised to respond to violence against women.
[326] The study also recorded a very high proportion of cases referred to government as being resolved: 75%, but this number does not represent the total caseload as the study was limited to an analysis of completed cases (i.e. cases that had received a service or where other factor had led to the case being closed). Typically, cases that are not resolved are left open until resolved.
[327] *ECHO Partners CM/IPA Data Review*, CARE, 2019 (internal study commissioned by ECHO).

Interviews yielded more insights into CM/IPA, and the perspectives of INGOs and TRCS were particularly interesting since they currently use SNF (from other donors) and CM/IPA (from the Facility) within the same community centres at the same time. The consensus of the interviewees was that CM/IPA had been effective in raising partner understanding of protection, and about the importance of rigorous documentation and systematic referrals. It had also advanced a protection agenda in a context of many competing priorities, and had therefore advanced protection[328]. However, it was also felt that CM/IPA created a somewhat artificial distinction between needs and types of assistance that are often complex to categorise, and that it needed to be complemented by something like SNF to fill other gaps (see box). In the end, when possible, partners used CM/IPA for their protection support with Commission humanitarian funding, and used more flexible SNF with other donor funding (including Commission development funding)[329]. CM/IPA was also felt to be rather bureaucratic and inflexible, and less effective at addressing the needs of unregistered refugees[330]. The evaluation team asked interviewees if they felt they were likely to continue to use the CM/IPA approach without the Commission's insistence, or if they had heard of other organisations using CM/IPA without Commission funding; the answer to both questions was no.

> 'The project aims to facilitate the schooling of children but let's say you identify a child that is at risk of not going to school because of disability. How can we provide a wheelchair if we do not have any funding for this? In the end, our field people were exhausted. There were identifying protection cases but not doing anything for these people'
>
> *– Commission humanitarian partner*

The evaluation team's conclusion from this is that CM/IPA was effective at raising staff awareness of protection and had clear protection benefits. However, even if it was effective, it was not comfortable for partners to use, and it will not be kept by partners in its current form after Commission funding ends.

b. Protection referrals carried out by other Facility projects

PDMM, SSCs and Community Centres were designed to provide protection services and to make protection referrals, but several other Facility projects also made protection referrals as a secondary activity to their main purpose. Among these, the WFP/ESSN project, UNICEF/CCTE project, and the UNFPA/Women and Girls' Safe Spaces (WGSS) project were particularly important.

The ESSN design had some shortcomings with regard to protection: an evaluation in 2018 highlighted that the programme was not informed by any 'specific gender or protection assessments' and '[n]o programme documentation references gender-specific needs, nor does one show whether or how these needs were incorporated into the design of the ESSN.'[331] Also, as discussed earlier in this report (Section 3.1.3 (i)(d)), the ESSN targeting methodology increased some protection risks, and competition between UN organisations, compounded by lack of MoFLSS support, led to a situation where ESSN design missed the opportunity to include UNHCR in such a way that ESSN intake would include a step of systematic protection assessment[332].

[328] KIIs.
[329] KIIs.
[330] KII. CM/IPA was governed by a complex set of SOPs and partners risked criticism from the Commission if these were misapplied.
[331] Maunder, N., K. Seyfert, M. Aran, G. Baykal, M. Marzi, and G. Smith (2018*) Evaluation of the DG ECHO funded Emergency Social Safety Net (ESSN) in Turkey November 2016-February 2018*. WFP Turkey and Oxford Policy Management, Ankara.
[332] Private communication with UNHCR staff.

In the end, WFP built its own protection referral mechanism using existing contact points with refugees: (i) WFP and TRCS field teams collecting data for CVMEs and PDMs in the field sometimes came across families with unmet protection needs; (ii) WFP staff doing monitoring visits to SASFs and to the *Halkbank* branches likewise; and (iii) on the TRCS side, the M&E team, outreach team, service centre team, and call centre also came across refugees with protection needs beyond cash. When any of these contact points came across a protection case, they would note the key information and fill in a protection referral form. Cases identified by WFP teams were forwarded to the WFP protection focal points in seven regions, from where they were referred to service providers in their region (GoTR, TRCS and NGOs – most often ASAM). TRCS used a different pathway, and sent all their referrals to the TRCS protection teams in community centres (financed by the Commission project under HIP 2017) for case management and follow-up, which often involved service provision within the community centre (internal referral) as well as external referrals[333].

Table 16 ESSN protection referrals 2018–2019

	2018-Q1	2018-Q2	2018-Q3	2018-Q4	2019-Q1	2019-Q2	Average
Health/Medicine	29	32	34	35	36	36	34
DGMM ID	19	19	18	18	17	17	18
Child Protection	13	11	10	9	9	8	10
In-kind/Financial Support	6	6	6	6	6	6	6
Education	6	5	5	5	5	5	5
Family Unification	5	5	6	6	6	7	6
DHR	4	4	4	4	4	4	4
ESSN Related	4	4	4	4	4	4	4
Informal Housing		3	3	3	2	2	3
Psychological Support	3	2	2	2	2	2	2
Legal		1	1	1	1		1
Shelter	1	1	1	1	1	1	1
Nufus		1	1	1	1	1	1
SGBV			1				1
Other	11	5	4	5	6	8	7

Source: WFP Monitoring Reports

Table 16 shows the profile of ESSN 2 referrals – altogether 8,621 referrals[334] up to the end of Q1 2020 (about 80% TRCS and 20% by WFP directly)[335]. There is no doubt that ESSN teams made a significant effort to address protection needs that they encountered; nevertheless the system had a structural gap in that it only addressed problems that the beneficiaries voluntarily brought to the attention of the ESSN teams, which usually did not include problems of child labour, early marriage, child protection or GBV, because highlighting those protection problems might lead to unwelcome state intervention or even disqualification from ESSN. The ESSN Mid-Term Review also confirmed gaps in some specific areas (see box).

> 'Referrals to specialist providers often take time before they are actioned. Key capacity gaps were identified in making referrals for women's shelters, child protection including services for unaccompanied children, specialist health services and gaps in the provision of special needs education.' – *ESSN Mid-Term Review*

Finally, there is no systematic data available on the outcomes of ESSN referrals, although the ESSN 2 evaluation's household case studies showed that five of six referred protection cases were still open.

UNICEF envisaged a protection component from the outset of the CCTE. This consisted initially of TRCS outreach teams following up children at risk of dropping out of school, and in the course of home visits conducting an assessment of the child protection needs of the family and possibly identifying other children who were out of school (some of whom would be working, and others simply not attending school). Later, the ASDEP component was added, by which MoFLSS outreach teams would similarly assess child protection needs during household visits. Up to the end of 2019, 61,985 children had been 'reached' by TRCS and ASDEP outreach teams, and TRCS and ASDEP teams have 'assessed' 7,586 of the OOSCs[336]. During a visit, families are given on-the-spot counselling on education attendance, early marriage and child labour (depending on the situation), and some children

[333] Within TRCS there was a structural problem that might have caused a few referral disconnects. TRCS is organised into teams: with an ESSN team and a protection team each funded by different donors (WFP or UNHCR), and for this reason TRCS saw a lack of registration as an ESSN team issue, not as a protection team issue: KII.
[334] There is a risk of double-counting of cases, because when WFP referred cases to TRCS they were usually counted twice, as WFP cases and also as TRCS cases.
[335] The primary source for this data is the Maunder, Nick et al. (2020). *ESSN Mid-Term Review*. Ankara. WFP. This was supplemented by the final *WFP Quarterly Monitoring Report Q4/2019-Q1/2020.*
[336] Data reported in the UNICEF logframe update documents submitted in July 2020 as part of Modification Request #6 for the CCTE project ECHO/TUR/BUD/2017/91007. The data is understood to be cumulative since the beginning of the CCTE, 'reached' is understood to represent all children reached, and 'assessed' is understood to represent only OOSCs who were assessed.

are referred onwards to MoNE, a TRCS community centre, or to other services (PDMM for registration including birth registration, MoFLSS for child welfare etc.). The evaluation team could not find data on the results of referrals, although the project reports stated that 14% of boys and girls assessed received a follow-up intervention.

UNICEF protection activities suffered somewhat from the same shortcomings as ESSN, in that (by design) UNICEF child protection actors only reached out to families who already had children in school who were at risk of dropping out. Typically, a team would be following up a known out-of-school risk case, and during the household visit would discover other similar cases, or even other protection risks. However, there are approximately 400,000 out-of-school children in Turkey, and only a fraction of them were assessed by the CCTE child protection teams. In particular, households where no children are in school fall completely outside the CCTE child protection net.

Table 17 UNFPA WGSS protection beneficiaries 2017–2019

UNFPA WGSS protection beneficiaries 2017–2019				
	Host	Syrian	non-Syrian	Totals
SGBV prevention services including awareness raising	12,353	276,948	3,448	292,749
SGBV response services including psychosocial support and referrals	3,425	34,169	1,432	39,026
Specialised treatment in the area of mental health and psychosocial support	9,020	124,539	3,131	136,690

Through three consecutive actions, the Commission supported UNFPA to establish and manage 25 Women and Girls' Safe Spaces (WGSS) in 14 provinces, two of which took place under Facility Tranche I for a sum total of EUR 24 million. All three projects combined (including the smaller project that took place under Facility Tranche II prior to WGSS being taken over by Ministry of Health (MoH) under SIHHAT) provided protection services for GBV and PSS as shown in Table 17[337]. All three sets of activities overachieved in relation to their targets. As far as the evaluation team can ascertain from the reports, all of the GBV response services were referrals to external parties for psycho-social support, legal and other response services, possibly some provided by SSCs and others by specialised PSS service providers. Referrals seem to have been mostly accompanied by an interpreter ('health mediator') and claim to have been followed up[338], but there is no data available on the outcome of GBV referrals.

The evaluation team also considered, albeit in less depth, a second Commission development project that aimed to enhance the livelihoods, protection and social cohesion of 5,000 Syrian women and girls in Gaziantep. EUTF Madad regional project T04.72 of EUR 12.5 million with UNWOMEN covering Iraq, Jordan and Turkey, and the Turkey component (EUR 5 million) worked with two local partners, ASAM (for protection and social cohesion) and International Labour Organization (ILO) (for livelihoods and skills training). The project established a women-only community centre in Gaziantep called the SADA Women's Centre, which provided a range of economic and social services to 5,000 women and girls, including (on the protection side) counselling for survivors of GBV, PSS counselling and protection-oriented SNF[339]. The project was assessed by SUMAF to be generally on track, and noteworthy for having identified and provided support to the most vulnerable women and girls in the Gaziantep refugee community. The project was making a substantial number of active referrals to government services and to other NGOs, mostly these seemed to be related to training and economic opportunities, but unfortunately the evaluation team was not able to obtain a precise cumulative number or breakdown of referral types for inclusion in the overall data analysis of referrals[340].

ii. Constraints encountered by Facility partners and attempts to overcome them

a. Overall policy and programming environment for refugee protection in Turkey

The evaluation team has chosen to highlight four major contextual factors that have shaped the policy and programming environment for refugee protection in Turkey: the underlying protection culture of

[337] Data from Calvo, A. J.et al. (2019). Evaluation of Women and Girls Safe Spaces (WGSS) Project. DARA.
[338] Calvo, A. J. et al. (2019). Evaluation of Women and Girls Safe Spaces (WGSS) Project. DARA, pp. 35–6.
[339] Subsidiary activities were undertaken in Mardin and Kilis in conjunction with the NGO RET.
[340] EUTF Madad project reports, and two SUMAF project monitoring reports from early 2019 and 2020, with the 2020 showing distinct improvement as the project progressed in implementation.

Turkey, the place of refugees within current Turkish political discourse, the relationship between Turkey and the EU, and the uncertainties of policy-making.

Citing several other academic sources, Volkan Yilmaz summarises well an argument also advanced by Ulmut Korkut[341] that Turkish society is unconducive (Korkut calls this 'selective') context for some of the protection problems facing refugees: 'Operating in a system "which does not yet have its own social work code of ethics", poor social services in Turkey have faced significant challenges, including the prevention of and response to violence against women and domestic violence, forced and underage marriages and child labour, long before the outbreak of the Syria crisis.'[342] Yilmaz also reminds readers of the European Court of Auditors' observation that the Facility did not include some possible key protection indicators because of government objections: the Facility has 'no aggregated indicators measuring progress with regards to sexual and gender-based violence, school dropouts, or child protection, due to disagreements with the Turkish government.'[343] In sum, there are some protection problems facing refugees that are also problems in Turkish society, and that the state has not yet managed to fully address, even though many of them are prohibited by Turkish legislation[344].

Regarding refugees in Turkish political discourse, it is important to note the changes that have taken place since the initial warm welcome offered by the government to 'Syrian guests' in 2014. Central among them, is the swing in Turkish public opinion against refugees, and the increasing challenges to social cohesion[345]. Although the government has remained firm in its commitment to provide safe haven to Syrians in Turkey, they are now doing so in a context where opposition politicians are using the spectre of refugees staying indefinitely in Turkey, to rally support for opposition causes. In this tense situation, which some observers feel the EU does not fully appreciate[346], the government seems to want to help refugees, but not in ways that the public can see (in order to avoid social reaction against refugees). This leads to the unusual situations where the government tries to verify Syrians in Turkey – but at the same time does not want to advertise the verification programme[347], and where the government extends ESSN with EU funding, while at the same time pronouncing loudly that the EU is 'doing nothing to help refugees in Turkey'[348]. The key point here is that despite the extraordinary reception that the government and people of Turkey have provided to refugees to date, there is no guarantee in law or in the system of public policy-making that this positive reception will stay forever.

This brings us to the third point: the difficult Turkey–EU relationship. At this fragile political moment in Turkey and in EU–Turkey relations, small moves by Turkey or by the EU could have big reactions within the Turkish political domain, or within and between EU Member States, and refugee protection could become collateral damage. In addition to this underlying fragility, the economic crisis in Turkey and COVID-19 have led to a general deterioration in refugee well-being in 2019 and 2020. In this light, it seems that if there is no continuation of large-scale assistance after Facility Tranche II, and especially if there is an abrupt end to ESSN without a proper transition to a successor state where refugees have realistic economic opportunities complemented by social assistance for those who cannot work, then there could be a sudden breakdown in the systems and services that refugees and humanitarian agencies have learned to take for granted[349].

Finally, regarding governance style, it was observed by several actors that the government has a tendency to make big, sudden and unconsulted policy changes, such as switching over camp responsibility from the Disaster and Emergency Management Presidency (AFAD) to DGMM, announcing camp closures, closing registration in some provinces, clamping down in Istanbul and changing health insurance for non-Syrians. These policy shifts are not always negative: for example, the decision to phase out Temporary Education Centres and admit refugee children to Turkish schools was a hugely positive measure for refugee welfare and protection, but when these changes took place

[341] Korkut, Ulmut (2016). Pragmatism, moral responsibility or policy change: the Syrian refugee crisis and selective humanitarianism in the Turkish refugee regime (Comparative Migration Studies, 2016, 4:2).
[342] Contextual policy analysis of the cash programme in a humanitarian setting: The case of the Emergency Social Safety Net: (2020), Cetinoglu, Talita, and Yilmaz, Volkan. See also Yilmaz, Gaye, Being Immigrant in a Conflict-Ridden Society in (2019). Integration through Exploitation: Syrians in Turkey. ICSS, Germany.
[343] European Court of Auditors (2018).
[344] To the short list provided by Yilmaz, could be added what the EU referred to as 'double disadvantaged' refugees: religious and ethnic minorities, Roma and similar communities, and socially marginalised groups with special needs such as LGBTI, sex workers, drug addicts, and people living with HIV and AIDS.
[345] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.
[346] KIIs.
[347] Commission project reports.
[348] KIIs. with EU officials.
[349] KIIs.

abruptly this often caught international agencies and even other parts of the government by surprise, and agencies doing their best to help refugees had to scramble to catch up. In some cases, major investments were undermined by these sudden changes[350].

b. Prohibition on outreach

As discussed earlier, since the attempted coup, the economic downturn, and again since the 2019 elections, the government has been clamping down on NGOs doing outreach[351]. NGO permissions are now very narrow and centrally managed by MoFLSS, and in 2020 (in the absence of widespread approvals) most NGOs are doing what they can with ad hoc local verbal arrangements and increased risks of their work being stopped at any point by the government[352]. As a result, outreach activities by NGOs are at an all-time low, especially inhibiting services in rural provinces where there are many SAWs and refugees scattered in small towns. Neither the EU nor other powerful donors have been able to make progress in dialogue with the government to overcome this obstacle[353].

c. Unregistered and out-of-province refugees

Understandably, as in European Union Member States, government policy favours protection for refugees who are registered and in-province. Recognising this protection gap, the Facility has made considerable efforts to bring refugees into registration, and to regularise refugees who are out of province. As argued earlier in this report, the Facility's efforts were largely successful regarding the registration of Syrians, and the two remaining gaps – both more difficult to address – are the registration of non-Syrians, and the regularisation of Syrians who are out of province. On this front, some observers argued that the Facility might have made more progress if the EU had been able to establish a stronger direct relationship with DGMM[354]. Meanwhile, Facility NGO partners have regularly provided services to unregistered refugees, both Syrian and non-Syrian, although these services were limited to what was within the direct domain of the NGOs (limited PSS, legal counselling, limited group awareness etc.). However, not all NGO partners report publicly on their assistance to unregistered refugees, in order to avoid attracting attention from the government[355].

d. Non-Syrian refugees

The challenges faced by non-Syrian refugees were discussed in some detail earlier in this report. Following the 'one refugee' approach advocated by UNHCR and the EU, the Facility made significant and successful efforts to include non-Syrians in some Facility programmes that were initially envisaged only for Syrians, crucially extending ESSN and CCTE to non-Syrians and ensuring nationwide implementation. Even though some non-Syrian groups such as Afghans have greater problems accessing services, it was a significant achievement that the overall rates of participation of non-Syrians in ESSN and CCTE was proportionately higher than for Syrians[356]. The Facility also ensured that non-Syrians had access to education and health services supported by the Facility, but the rates of inclusion of non-Syrians have been less complete in this regard, because the PICTES and SIHHAT projects were designed to support Syrians and geographically focused on provinces with large Syrian populations and with limited capacity for Farsi speakers, hence limiting coverage of non-Syrians. The ASAM project stands out as a clear attempt by the Facility to ensure that some of the constraints faced by non-Syrians were overcome.

e. Constraints experienced by physically and socially isolated refugees

There were several groups of socially isolated refugees ('double disadvantaged' – see Box 3) that the Facility made efforts to support, compensating for service 'blind spots' in the Turkish system by supplementing Turkish government agencies with NGO services. Among these, this report will discuss in more detail below the constraints facing SAWs, and the LGBTI community. The evaluation team was unable to identify activities aimed specifically at supporting religious minorities (Yazidi, Assyrians,

[350] KIIs.
[351] KIIs.
[352] KIIs.
[353] KII.
[354] KIIs. with EU officials.
[355] KIIs.
[356] European Commission. (2019). Evaluation of the European Union's Humanitarian Response to the refugee crisis in Turkey. Brussels: EU.

Christians), although it is well-established that Yazidis can have difficulty because they are socially isolated and do not trust authorities[357].

f. Seasonal agricultural workers (SAWs)

The evaluation team could not find a reliable estimate of the number of SAWs in Turkey, refugee or not, but it is certainly over 1,000,000 – and refugee SAWs could be in the several 100,000s. World Bank data on agricultural employment shows that agricultural employment was a steady 23% of the official labour force until 2014, when it dropped to 18% (2019–2020). Much of this gap of 2,000,000 SAWs (5% of all employment in Turkey) might have been filled by refugees working unofficially in the agriculture sector.

Refugees in Turkey are permitted to work in the agriculture sector without a work permit[358]. This employment is favoured by many Syrian refugees with little education, 30% of whom worked in agriculture in Syria or even as migrant agriculture workers to Turkey before the Syria crisis. Syrians are at the bottom of the SAW hierarchy – they have the hardest jobs and the least tenure – below Turkish Kurds and other Turkish citizens. The academic literature does not agree on whether refugees have displaced other workers, or simply filled a new gap as others have moved up the Turkish employment hierarchy[359]. Typically farm labour is organised by labour intermediaries, also known in Turkish as *elçi*. These are brokers who recruit, manage, transport and often also supply the workers with land, water and food – although these latter services are usually on a for-profit basis. Even though the intermediaries are generally regarded as exploitative, they are an essential component of the agriculture labour system, they provide services that refugees need if they want to access agricultural work, they help refugees relate to Turkish institutions that do not speak Arabic, and in some cases help refugees access health care.

SAWs are physically isolated, usually they live in tent settlements near the farms where they work, and well out of sight of the general public and city-based service providers. Given the general prohibition on outreach, this population is very rarely visited by refugee support agencies[360]. There is a particular sub-set of agricultural workers who are even more isolated – water mill workers, who live with their families at remotely situated irrigation junctions and who are responsible for switching the irrigation channels between different fields.

> 'These tent households have very little by way of kitchen equipment or food, and even their basic needs are not met. The Syrian labourers work for long hours in difficult working conditions. Their wages are less than those paid to local workers, and are sometimes not paid at all. Child labour is widespread among families with many children, and is particularly high for girls' – *Development Workshop*

SAWs are partly regulated, in particular the wages are set in each seasonal context by a committee of government officials, farmers and intermediaries, and are typically at or just above minimum wage. Interviews and academic studies report that most Syrians do receive base pay at minimum wage[361], but then there are deductions made by the intermediaries for facilitation and other services that the intermediaries might provide, so that refugees usually only take home 70–90% of their basic pay. Some refugees complain of not being paid, but the more common complaint is being paid late[362]. From a protection viewpoint, the bigger problem is that the payment system of family and team contracting creates strong incentives for child labour.

SAWs face six particular protection problems by virtue of their work and living context: inadequate shelter (although often this is also free), difficult working conditions (long hours of repetitive manual labour in harsh outdoor conditions), child labour, near total absence of education services, difficult-to-access health services, and (arguably) low wages[363]. In the Development Workshop survey (conducted in 2016) 88% of the refugees were registered (presumably this percentage is higher by 2020 given the

[357] KIIs.
[358] Regulation on Work Permits for Foreigners under Temporary Protection (2016/8375) published in the Official Gazette on 15 January 2016, allows Syrians refugees to work in agriculture without a work permit but requires them to be paid minimum wage.
[359] Development Workshop. (2016). Fertile Lands, Bitter Lives The Situation Analysis Report on Syrian seasonal agricultural workers in the Adana Plain. Ankara; Pelek, Deniz. (2018). Syrian Refugees as Seasonal Migrant Workers: reconstruction of unequal power relations in Turkish agriculture, in Journal of Refugee Studies vol 32; and Kavak, Sinem. (2016). Syrian refugees in seasonal agricultural work: a case of adverse incorporation in Turkey in New Perspectives on Turkey, vol. 54.
[360] KIIs.
[361] Development Workshop. (2016). Fertile Lands, Bitter Lives: The Situation Analysis Report on Syrian seasonal agricultural workers in the Adana Plain. Ankara, and AIDA (2020). Country Report: Turkey.
[362] Ibid.
[363] KIIs.

intense verification effort), but 40% of the SAW refugees were out of province, and in any case they move frequently between provinces as they follow the annual agricultural labour circuit[364].

Regarding child labour, 50% of children (under age 17) in the field survey were working: 'the distribution of working boys by age group shows 33.9% of them to be aged between 6 and 14, 22% to be 15 and 44.1% to be 16 or 17. Of working girls, 41% are aged 6–14, 20.5% are 15 and 38.5% are aged 16–17.'[365] A shocking 97% of the children in the surveyed households were not in school[366], and 24% of girls aged 15–17 were married. The evaluation team could not find data on whether SAWs are accessing ESSN, but it is unlikely since most SAWs are out of province, and furthermore, as residents of tent settlements they cannot easily obtain a *nüfus*.

The Facility was aware of the particular constraints facing SAWs, and in Facility Tranche I provided a little support from the Commission through one small focused project with the NGO GOAL in association with Development Workshop[367]. In addition, the evaluation team heard reports of SSCs reaching out to help SAWs in remote locations get registered so they could access health services[368], and a number of organisations were trying to assist SAWs in the course of their normal work[369]. But in the end, it seems that this large population of very vulnerable refugees is not accessing most protection services.

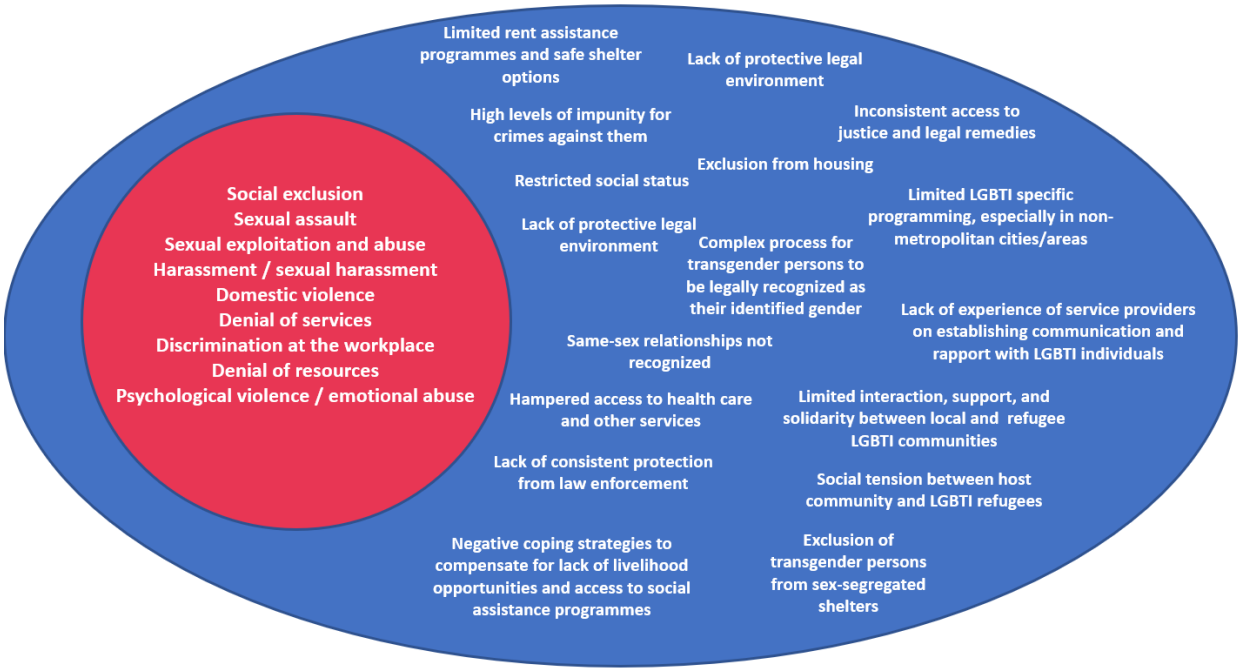
g. LGBTI refugees

The total number of LGBTI refugees in Turkey is not large, but the protection risks they face are severe, and the services available are limited. The latest available data on the protection sector LGBTI dashboard (data to end 2018) shows that there were 3,095 LGBTI individuals who received a service in 2018, the vast majority in the Marmara and Aegean regions[370]. In a 2019 survey conducted by the NGO KAOs, [371] 75% of the surveyed refugees were Iranian, including 90% of the transgender refugees in the survey[372]. The survey showed that LGBTI refugees faced discrimination, harassment and withholding of service in every sector, including PDMM and NGOs. LGBTI are inter-sectionally vulnerable, many are very poor, socially isolated, some also have HIV, they have difficulty getting service from government, they are pushed to more negative coping strategies, and need more PSS support[373].

[364] Agriculture work is available in every season somewhere – hence the itinerant lifestyle and tent accommodation. Indeed, SAWs must keep moving if they are to sustain their income. SAW is usually 7 days/week and then with unpaid breaks when the weather prevents farm work.
[365] Development Workshop. (2016). Fertile Lands, Bitter Lives: The Situation Analysis Report on Syrian seasonal agricultural workers in the Adana Plain. Ankara.
[366] Child labour and early dropout from school are also serious problems for Turkish SAWs (UNFPA 2012 study).
[367] EUR 1.5m in Facility Tranche I, and another EUR 3.5m in Facility Tranche II. This first project was aimed at supporting SAWs and Dom, but the resources were mainly allocated for research and only a smaller proportion for direct assistance.
[368] KII.
[369] KIIs.
[370] *Turkey Protection Sector LGBTI thematic dashboard*, March 2019, UNHCR, Ankara. It is not clear if this regional distribution is because LGBTI self-declare more easily in these regions, or (more likely) because LGBTI refugees have moved to these regions. When UNHCR and ASAM were registering non-Syrian refugees, the practice when identifying refugees as LGBTI was to assign them to satellite cities that were known to be more conducive to the LGBTI community, but since September 2018 there has been no more information on how DGMM is handling this assignment process.
[371] Turkey's challenge with LGBTI refugees, 2018, KAOS, Ankara.
[372] In addition to Iranian LGBTI being the largest nationality within the refugee LGBTI community in Turkey, they also seem to be the best educated and best organised. Their primary focus is on resettlement.
[373] KII.

The Protection Working Group has identified several risk factors for LGBTI individuals (see Figure 29),

Figure 29 LGTBI risks and contributing factors identified by the Protection Working Group



and a Commission 'Call to Action' workshop on GBV identified six main challenges in providing services to LGBTI refugees (see Box 4).

Box 4 Challenges to providing services to LGBTI refugees in Turkey (Call to Action 2018)

- Lack of reliable information
- Lack of service providers and adequate translation services
- Lack of capacity of NGOs to provide services to these groups – this also leads to these groups being invisible
- Limited number of [LGBTI] specifically focused NGOs/CSOs
- State services do not include [LGBTI], no specific [LGBTI] targeted services
- There is no legislation on LGBTI, but also no legislation on hate crimes

UNFPA submitted a proposal to the Commission in 2017 to support three distinct marginalised refugee groups: LGBTI, people living with HIV and AIDS, and sex workers (grouped under the title 'Key refugee groups' – KRG) but it was not approved. Instead, the Commission agreed that KRG would be added to the existing project for WGSS, and a separate KRG project was supported in Facility Tranche II. The LGBTI component within the WGSS project assisted 613 refugees identifying as transgender (464 non-Syrian and 142 Syrian), as well as 1,973 refugees identifying as gay (gay or lesbian) and 258 as bisexual[374]. Support was in the form of counselling and referrals, PSS and cash. The 3RP dashboard reported that in 2019, 8% of 'protection cash' recipients were 'gender non-conforming,' suggesting that cash has become the primary vector of assistance for LGBTI refugees in Turkey.

The consensus of interviewees was that LGBTI (as well as sex workers and to a lesser extent people living with HIV and AIDS) will never be fully recognised or supported by government agencies in Turkey – the society and especially its government institutions are too conservative – and that NGOs are the

[374] Final Report of UNFPA project ECHO/TUR/BUD/2017/91001.

only effective pathway for them[375]. One interviewer remarked that they are not seen as a group with human rights in Turkey, not even Turkish LGBTI[376].

The Facility, through a project with UNFPA[377], has risen to the challenge posed by providing services to LGBTI refugees in Turkey, and seems to the evaluation team to have caused a proportionate response to the special needs of this community. It is to be hoped that this work could somehow be connected with the work on LGBTI rights in Turkey that is included in the Commission's programme for Turkey under IPA 2[378]. From interviews, it seems that the planned MoFLSS direct grant for social protection will focus upon the vulnerable groups that are prioritised by the Ministry (children, women survivors of violence, the disabled, and the elderly), but that it will not support some marginalised groups at special risk such as Dom, HIV positive and LGBTI refugees, and sex workers.

'KRGs can often not access public services because of language barriers, stigmatization, discrimination, abuse and violence, visibility problems, invisibility of service information, poverty, precarity, or because of lack of services that would respond to the vulnerability and needs of the key refugee groups' – *UNFPA 2017 project Final Report*

iii. Constraints recognised by the Turkish government

Even if the Turkish authorities do not fully recognise the constraints faced by SAWs[379] and LGBTI refugees, they do recognise the constraints faced by women survivors of violence, and children (including early marriage and child labour). Unfortunately, these risk factors are also prevalent in Turkish society.

a. Gender-based violence

GBV is a widespread personal (physical) protection risk facing refugees in Turkey, and every protection partner has a GBV component. The constraints to services for GBV survivors in Turkey were summarised by an EU Call to Action workshop in November 2018[380] (see Box 5). Although GBV is also a concern in Turkish society, the protection risk was thought to be greater for Syrians because of social conservatism, social isolation, lack of knowledge of recourse mechanisms, language barriers to accessing services, and less capacity in

Box 5 Barriers to providing services to GBV survivors in Turkey

- Very little information available
- Language barriers to access services
- Unwillingness of survivor to disclose
- Reluctance of governmental services to assist – based on issues of staff capacities, staff knowledge, and staff attitudes towards domestic violence
- Limited funding for governmental institutions to work with survivors
- Limited exchange of knowledge/best practices between public institutions
- Policies and laws in place but the implementation is lagging behind
- Survivors seem hopeless – do not see a way to get out of abusive patterns
- Ineffective complaints mechanisms
- Economic dependency of the survivors
- LGBTI victims are criminalised
- No specific law for the protection of LGBTI victims
- LGBTI cannot access shelters
- Capacity of shelters to accommodate the caseload and the way the shelters operate (incl. time of stay, no empowerment options for survivors in shelters and restrictive rules)

[375] KIIs. Evidence of discrimination against LGBTI individuals and lack of state protection is found in US State Department Turkey 2019 Human Rights Report, and Turkey UPR 2020 (where 22 recommendations affected LGBTI persons, and where UNHCR made a specific statement regarding the discrimination and social isolation of the LGBTI community in Turkey). The main issue is that there are no laws protecting LGBTI persons from hate speech or from discrimination (including housing and employment discrimination), or providing family rights to LGBTI persons. There are also some cities that consistently ban the assembly of LGBTI persons despite contrary court rulings. Widespread media reports in 2020 refer to an increase in anti-LGBTI statements from the President and senior officials (health, religion). The International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA) rates Turkey as 48th of 49 countries in the greater European region in terms of respect for LGBTI rights.
[376] KII. It should however be noted that LGBTI is reportedly one of the protection risk categories used by PDMM protection desks.
[377] UNHCR also has an initiative to support LGBTI refugees in Turkey, but not with Facility funding.
[378] 'As regards fundamental rights, reform efforts need to result in improved protection for human rights and fundamental freedoms, the rights of persons belonging to minorities and in vulnerable groups, including lesbian, gay, bisexual, transgender and intersex (LGBTI) people, and other groups affected by discrimination and violence.' *Indicative Strategy Paper for Turkey (2014–2020*). Brussels, EU.
[379] The government of Turkey is placing some emphasis upon the problem of child labour in the Agriculture sector, in an effort to meet its UN convention commitments, but progress is lagging behind the policy commitments, and implementation is expected to slow further during the current economic crisis which has placed upward pressure on food prices and downward pressure on agriculture wages.
[380] DG ECHO. (2018). Report on workshop 'Call to Action on Protection from Gender-Based Violence in Emergencies.' Ankara.

the government to intervene or to provide support[381].

In general, women and girls are reluctant to go to government authorities for support, and referral pathways are reportedly not working as well as they should, although referrals from PDMM Protection Desks did take place (see 3.3.2.i)[382].

Unfortunately, Turkey does not use the global standard system for reporting GBV: Gender-Based Violence Information Management System (GBVIMS), so there is no systematic collection of data on response and referral of GBV cases to government agencies and other service providers. However, GBV data is captured in different ways. GBV data reported to the 3RP (Table 18) shows a significant number of adult men participate in GBV activities, although adult women and girls make up the two largest categories of beneficiaries. Table 18 represents data from 2019–2020 only, and the main point to note is the relative sizes of the different categories. Some men and boys have experienced GBV, mostly before coming to Turkey[383], but GBV services for men are scarce (especially in SSCs) and mostly centred on awareness rather than response.

The vast majority of reported GBV beneficiaries (men as well as women) are participants in prevention information sessions. The Facility's own reporting on GBV used different parameters before and after Q3 2019: before Q3 2019 the main reporting parameter was GBV prevention activities (237,094 beneficiaries recorded since the start of data capture in 2017), but since Q4 2019 the main reporting parameter is '(S)GBV survivor' as a 'type of need' (n=572) in Q4 2019.

Table 18 GBV beneficiaries reported by 3RP 2019–2020

GBV beneficiaries	
Adult women	58,001
Girls	50,195
Adult men	39,265
Boys	1,357
Adult LGBTI	73
LGBTI children	10

The Facility made significant efforts to address GBV and to overcome the constraints identified in Box 5. The central activity focused on GBV was a series of three projects with UNFPA, including the WGSS project referenced above (Table 17), which provided GBV response services to 39,000 refugees. In addition, the Commission funded a small GBV project with DRC, which unfortunately did not achieve its intended results due to weak delivery, and regulatory constraints. These GBV-focused activities were supplemented by GBV identification and referral through all of the Facility's other protection partners. While GBV remains a concern for the refugee population, the evidence does not show that this is a major unmet need – it does not seem to be a prominent service gap. With this in mind, the overall assessment of the evaluation team is that the Facility has adequately addressed GBV risks in Turkey, and taken appropriate measures to provide GBV awareness and response services, within a difficult operating environment. However, the team does have a concern with the future of GBV services for refugees in Turkey. Currently, most of the prevention and response services are provided by NGOs or provided by MoFLSS with direct support from UNFPA. If these NGO and UN mechanisms are not sustained, and GBV prevention and response is left entirely to the Turkish state system, it seems likely that the level of coverage and support would decrease.

b. Psycho-social support

Most of the Facility community centres and SSCs provided PSS as part of their service. Because of constraints on the NGO delivery of mental health services (restricted to government health institutions and requiring official permits from MoH), most PSS in community centres seemed to consist of group counselling and 'psycho-social first aid'. This was sometimes delivered by psychologists, but because of the stigma associated with mental health there were reportedly few male beneficiaries of these services. These community centre services might help some refugees, but are not likely to resolve deeper problems that need more intense, individual and professional psychological counselling, or psychiatric support. At least one EU official believes that there is a serious mental health crisis among refugees – with as many as half of all refugees suffering some measure of PTSD or dislocation-related stress (based on reporting of mental health problems experienced by refugees who have moved on to Europe). However, this might be underreported by the government either because this is not something

[381] KIIs.
[382] KII.
[383] KII.

they measure, or because treating mental illness is difficult and expensive, and not the government priority[384].

The accompanying Health Sector Report discussed mental health services in more detail, and the main conclusions of that report are that there is a gap between the needs and the available mental health services in Turkey, in part because of lack of qualified mental health professionals especially psychiatrists and above all psychiatrists who can speak Arabic, but also because many mental health problems such as PTSD, depression, anxiety and stress are not well-recognised or treated in the Turkish mental health system. Despite efforts made by the Facility, it seems that refugee mental health is insufficiently addressed in Turkey, and that this remains a significant protection risk.

c. Child protection

Child protection risks can be separated into four main categories: the risks facing children not in school, children who are working, early marriage (which is also considered to be a sub-set of GBV), and children who are unaccompanied or separated.

Through the CCTE project, TRCS provided follow-up support to refugee children at risk of dropping out of school, thereby helping keep children in school (a clear protection benefit even if not technically a protection service). Being out of school is not just a short-term problem, but is also a very significant long-term risk factor for Syrians in Turkey, as much of this generation could be 'lost' as a result of missing some or all of their schooling[385], and might require a different sort of structural and long-term support in order to prevent severe social problems in the future.

However, as discussed earlier in this report, the number of children directly assessed by TRCS outreach teams was 7,586 – a fraction of the estimated 400,000 out-of-school children in Turkey[386]. A TRCS a study of children who had dropped out or who were at risk of dropping out surveyed 5,304 school age children in 14 (Syrian refugee) provinces in order to analyse their child protection risks (see Figure 30)[387]. The risks were spread evenly between boys and girls, except that boys faced a much higher prospect of child labour, and girls faced a much higher prospect of 'harmful traditional practices' (early marriage).

In further analysis of the 'solutions' found to these cases, there was high variation in success rates (i.e. children returning to or staying in school) depending

Figure 30 TRC survey of protection risks facing children out of school or at risk of dropping out of school

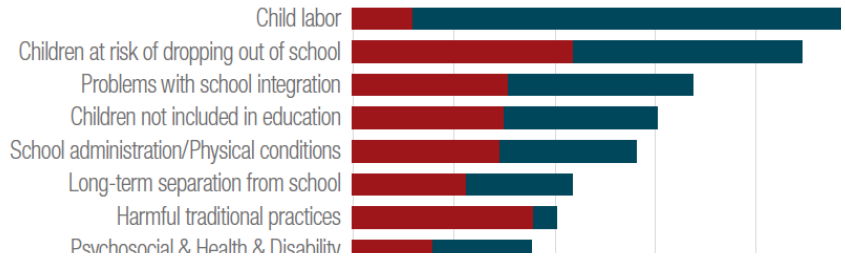
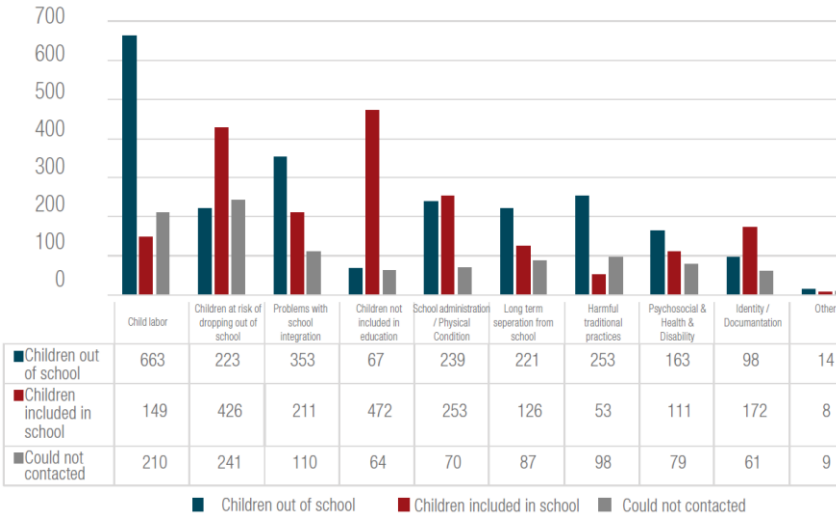


Figure 31 Solutions to the protection problems faced by out-of-school children, or children at risk of dropping out



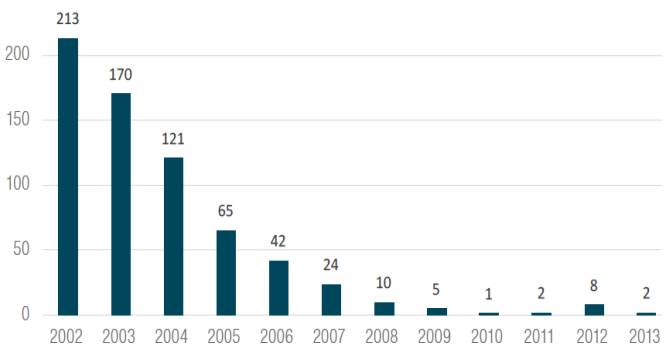
	Child labor	Children at risk of dropping out of school	Problems with school integration	Children not included in education	School administration / Physical Condition	Long term seperation from school	Harmful traditional practices	Psychosocial & Health & Disability	Identity / Documantation	Other
Children out of school	663	223	353	67	239	221	253	163	98	14
Children included in school	149	426	211	472	253	126	53	111	172	8
Could not contacted	210	241	110	64	70	87	98	79	61	9

[384] KII.
[385] KIIs.
[386] https://www.unicef.org/appeals/files/UNICEF_Turkey_Humanitarian_Situation_Report_MidYear_2019.pdf (2019). *UNICEF Turkey humanitarian situation report.*
[387] Situation analysis of school access and attendance by children under international and temporary protection in Turkey: (2019) TRC, Ankara.

on the nature of the protection problem. As can be seen in Figure 31, more intractable problems were child labour, problems with integration (presumably bullying, language barriers), long-term separation from school and 'harmful traditional practices' (parental belief that teenage girls should not be in mixed-sex classes, and child marriage). In the middle of the range is the problem of schools not making it easy for children to access: either frozen enrolment, or high administrative/paperwork barriers, or cost barriers such as transport and uniform costs. Finally, other problems easier to solve were documentation, 'being at risk of dropping out,' and 'not being included' (it is not clear to the evaluation team what that means as a category). The big conclusion from this data is that (male) child labour is both the biggest risk group in terms of numbers, and the most intractable problem to solve.

In the TRCS study, the distribution of child labour cases is very regular (Figure 32) but note the study was carried out in late 2018 so children born in 2002 were 17-years old), and consistent with the age distribution found by the Development Workshop research cited earlier[388]. Unfortunately, other data from TRCS[389] shows that the incidence of child labour in surveyed families increased from 10% to 15% over the lifetime of the project, particularly in families not receiving ESSN[390].

Figure 32 TRC study: child labour age distribution (survey end 2018)



TRCS data was confirmed by a UNHCR protection assessment, which found that 'child labour was the highest reported protection risk among all refugee nationalities (63%). The main reported causes were financial needs and the lack of ability (due to health issues and old age) of the accompanying adult family member/s in the household. Many participants also indicated that the informal market prefers hiring younger males to adult ones, citing as potential reasons the fact that they are sometimes perceived to be more able bodied and flexible in the workplace, as well as cheaper to hire.' [391]

The evaluation team was not able to find recent data on the total number of child workers in the refugee population, but given the interruption in schooling due to COVID-19, the diminishing real value of ESSN and CCTE in relation to inflation, and the constrained labour market in Turkey due to the economic downturn compounded by COVID-19, it is considered very likely that the incidence of child labour is increasing in Turkey, despite the efforts of the humanitarian community. Given the rate of poverty among refugees and the powerful market incentives for child labour, as well as the absence of effective regulation of child labour in Turkey, it seems unlikely that this trend can be reversed in the short to medium term.

The refugee perspective

'For cheap labour, children are preferred by employers. They are paying them 20 TL instead of 120 TL.'

– Somali mother in Isparta (source: UNHCR)

[388] Development Workshop. (2016). Fertile Lands, Bitter Lives: The Situation Analysis Report on Syrian Seasonal Agricultural Workers in the Adana Plain. Ankara.
[389] UDA Consulting. (2020). Responding to protection needs of refugees in Turkey – endline data collection and comparative analysis, TRC, Ankara.
[390] This TRCS figure of 15% is similar to WFP data on child labour as a negative livelihood coping strategy that showed a slight but statistically insignificant drop in child labour between CVME3 and CVME5.
[391] Participatory Assessment on Livelihoods, 2018, UNHCR, Ankara.

d. Child marriage

Early marriage is recognised as one of the most difficult child protection problems to solve in Turkey – most of all because it is seen by Syrian parents themselves as a solution not as a problem. The TRCS endline survey showed that it was widely understood by refugees that the legal age of marriage in Turkey is 18 (or 17 with parental consent)[392], and yet it also showed that the incidence of early marriage remains high – demonstrating that the legal age of marriage is not a deterrent. Challenges with addressing early marriage were identified by the EU 2018 Call to Action workshop (see Box 6)[393].

Box 6 Constraints to addressing refugee early marriage in Turkey

- Causes of child marriage are challenging (economic/religious/social norms/etc.)
- Legal framework available but implementation is patchy and difficult
- Negative effects of the legislation on girls – the incarceration of husband/father might lead girls not to disclose
- Self-reliance decreases with the marriage (reduced possibilities to decide about the future)
- Limited space to cooperate with governmental bodies on these issues
- NGOs need to be active in the field on this
- No attention to boys that are affected by this
- Challenges with the engagement of men and boys (for prevention)
- Lack of multi-disciplinary survivor-centred approach for this group
- Lack of Information Management System

All protection partners placed emphasis upon preventing child marriage in their information and counselling work, and on identifying early marriage cases. However, as Box 6 illustrates, many married children and especially their families, conceal this relationship for fear of sanctions on their family or husband that might place them at greater risk, and some reports claim that the incidence of child marriage is increasing due to the same economic hardships driving child labour[394]. Readers will also recall the earlier discussion on the way that the demographic targeting methodology of ESSN created incentives for families to marry their children young, in order to maintain their ESSN eligibility.

The contribution conclusion of the evaluation team is that the Facility has made appropriate efforts in this regard, but has made little progress. Also, short-term prospects for reversing this trend seem to be diminishing as there is increasing tolerance in Turkey for *nikah* marriages (traditional religious marriages without legal weight), and draft legislation would reduce the penalties for people convicted of sexual abuse of children if they marry their victims[395]. This is an area where the EU could do more, but the evaluation team also concludes that Facility programming is unlikely to make much progress – what is needed first is a clear policy signal from the Turkish authorities, for which EU policy dialogue through the bilateral channel and IPA 2 instrument would likely be needed.

e. Unaccompanied and separated children

There is little data on unaccompanied children. For the most part, Syrian children travelled to Turkey with relatives, and they seem to be able to remain with relatives[396]. TRCS is also part of the Red Cross/ Red Crescent movement's global network aiming to restore family links and trace relatives, including relatives of unaccompanied children. The most significant group of unaccompanied children seems to be Afghan teenagers, reported by ASAM and IOM to be travelling alone or with friends and mostly intending to travel onwards to Europe. These Afghan teenaged children are not treated well, some are subjected to a 'bone-test' in order to determine their age[397], and many are treated and detained as adults. There are also reports of unaccompanied minors coming from Syria to the border provinces (especially Hatay) for medical treatment, and after the treatment they are returned to Syria[398].

[392] Legal age of marriage in Syria is 18 for boys and 17 for girls, but can be 15 years for boys and 13 for girls with judicial consent.
[393] Report: 'Call to Action on Protection from Gender-Based Violence in Emergencies' Turkey Workshop, November 2018
[394] For example, ECPAT. (2020). Briefing paper on the sexual exploitation of children in Turkey. Ankara, International Crisis Group. (2019). Mitigating Risks for Syrian Refugee Youth in Turkey's Şanlıurfa.
[395] https://www.globalcitizen.org/en/content/child-marriage-Syrian-refugees-Turkey-covid-19/
[396] Readers will recall that there were some reports of children being 'loaned' to other families for registration purposes in order to qualify for ESSN – which might create a protection risk for those voluntarily separated children.
[397] KII.and AIDA (2020). *Country Report: Turkey.* Bone testing is reportedly a discredited methodology.
[398] KII.

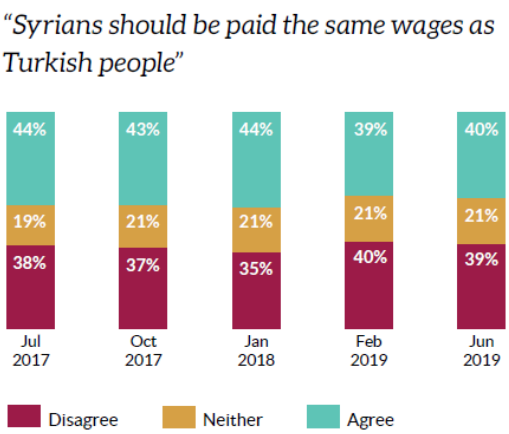
f. Irregular work

> 'Out of 2.16 million Syrians of working age in Turkey, 1 million are estimated to participate in the labour market, most of them informally in low-skilled and low-paid jobs' – *ILO*

There are millions of irregular Turkish and refugee workers – they are needed by the agriculture and industrial sectors, and there is such a large informal economy (perhaps 10,000,000 jobs) that it can absorb the available supply of one million Syrian workers[399]. Irregular work exposes refugees to some protection risks (being paid less than minimum wage, not being paid at all, being employed underage or in dangerous conditions etc.)[400]. But the government understands that refugees need to work to survive[401], and as a result the risk of being apprehended by the security agencies does not seem to be high, especially not for Syrians[402].

When asked about their protection risks in the informal market, the majority of participants in the 2018 UNHCR study referred to issues relating to exploitative conditions, including non-payment or unequal payment of salaries compared to other employees (see Figure 33). Many participants in the UNHCR FGDs also cited that they felt unable to complain about ill-treatment on the part of employers, for fear of losing their jobs. Women spoke of sexual harassment and sexual exploitation; one Iranian woman stated that she was not paid by her employer but her colleague 'always got her wages on time because she had a relationship with the owner'[403].

Figure 33 Turkish opinion on refugee wage equality (source WFP)



Among the seven major migrant vulnerabilities assessed by IOM, working without receiving the agreed payment was the biggest vulnerability factor for Iranians and Afghans, less so for Syrians and less still for Iraqis. Underpayment was more common in the construction sector than other sectors. Nearly all respondents in the IOM research had encountered children working against their will in Turkey with little or no pay[404].

As far as the evaluation team can determine, the protection risks of irregular work were not a major focus for the Facility. Given the level of official tolerance for irregular work, the nature of the informal labour market in Turkey and of the role of Syrians in that market, the importance of irregular work for refugee survival in Turkey and as a source of dignity, empowerment and self-reliance, the evaluation team agrees with the conclusions of Murat Erdogan[405], that there is little benefit or likelihood of success in advocating with the government for the formalisation of refugee labour. Instead, as Prof. Erdogan argues, the emphasis should be on improving the conditions of informal labour, for example allowing refugees to regularise their employment-driven inter-provincial transfers, so that they can at the very least access the normal range of public services when working informally.

g. Absence of an integrated referral system

Several interviewees remarked that effective referrals are hindered by uneven and therefore unpredictable service standards between locations and agencies, and the absence of a standardised referral system. In part the problem is that services can legitimately vary according to resources, capacities and mandates, but without a more transparent system of referrals, cases can be 'ping-ponged' around between service providers[406].

An inter-agency service referral form was developed as part of the 3RP process in Turkey and rolled out in 2018, but adoption and use were still a work in progress. Some organisations with well-

[399] KIIs.
[400] KII.
[401] This has also been proven in a court case: where the need to survive was considered to outweigh the punishment for irregular work.
[402] KII.
[403] Participatory Assessment on Livelihoods, 2018, UNHCR, Ankara.
[404] 2018, Migrant vulnerabilities Report, IOM, Ankara.
[405] Migration and Integration Research Centre, (2020) *Syria Barometer 2019*, Ankara.
[406] KII.

established systems for referrals continued to use the old systems (i.e. ASAM and Human Resource Development Foundation (HRDF) referrals to UNHCR)[407], both TRCS and WFP had their own forms, and as a result the inter-agency referral form was mainly used by NGOs referring cases to each other. One of the gaps in the system was that MoFLSS did not want to use the standard inter-agency form (indeed they did not generally welcome referrals from NGOs at all), preferring a more generic 'social inquiry form'[408]. However, in Istanbul, where UNHCR was proactive and PDFLSS was receptive, PDFLSS agreed to pilot a simplified version of the inter-agency referral form to help the overloaded SSCs prioritise urgent cases in a more systematic way[409].

The Facility did not seem to place a priority on building an improved referral system, but in fairness this is more the responsibility of the Protection Working Group than any particular donor. However, as the Facility is starting out on a new direct grant with MoFLSS, there is an opportunity to engage with MoFLSS on validating and adopting the model piloted in Istanbul, to improve the systematic referral of protection cases from NGOs and TRCS to SSCs.

h. COVID-19

Finally, there are indications that that the protection needs of refugees have grown sharply, and that services have also decreased, during COVID-19. The most serious impact has been economic: the sudden loss of informal jobs has hit refugees hard because they nearly all depend on informal labour to survive (ESSN is not enough to meet basic needs)[410]. Also, refugees reliant on informal labour cannot benefit from government COVID-19 relief, and yet they are experiencing other COVID-19-related pressures such as increased prices and evictions. According to the academic Franck Düvell, it is anticipated that the vast majority of previously marginal but surviving informal workers will need to resort to negative coping strategies[411].

> 'As another consequence, 50% of men and 35% of women concluded that "there is an increase in protection risks faced by the community due to COVID-19", such as exploitation, 30%, violence, 80% or early marriage, 20%. Finally, "3RP partners have started to observe a notable deterioration in individual mental health resulting from the impact of COVID-19"' – *Franck Düvell*

In addition to the economic hardship and its multiple consequences, services were also restricted. PDMMs provided limited services targeting only persons with specific needs for 3–4 months, and even though they reopened in July 2020 the regular PDMM work was reportedly backlogged[412]. ESSN continued throughout COVID-19, and the EU importantly approved an additional contribution of EUR 485 million to extend ESSN and CCTE beyond the amounts allocated in the Facility, and also provided an additional COVID-19 top-up of TRY 1,000 paid in two instalments over summer 2020[413]. Furthermore, it was reported that SSCs and SONİMs remained open, but most in-person services of community centres were suspended and counselling moved online or onto the telephone. As of June 2020, there was no visible increase in social tensions due to COVID-19[414]. In the long run, the interruption in education might have a serious long-term impact, as some children who were already struggling might just drop out altogether if catching up becomes impossible[415].

iv. How well has the Facility addressed these constraints to service access?

The Facility and its many partners demonstrated that they were aware of the constraints facing refugees that need to access protection services, but they were only partially successful in overcoming those constraints. Two channels for increasing protection services that worked well were PDMM protection desks and community centres. Among the community centres, TRCS centres were institutionally stronger, better positioned as referral hubs, and had better access to government – but

[407] KIIs.
[408] KIIs.
[409] KII.
[410] KIIs.
[411] German Journal of Forced Migration and Refugee Studies, vol. 4, issue 1, 2020 *Turkey: The Coronavirus-Emergency and its Impact on Refugees,* Franck Düvell.
[412] KIIs.
[413] EU Press release (10 July 2020). Turkey: Extension of EU humanitarian programmes supporting 1.7 million refugees receives green light.
[414] German Journal of Forced Migration and Refugee Studies, vol. 4, issue 1, 2020 *Turkey: The Coronavirus-Emergency and its Impact on Refugees,* Franck Düvell.
[415] KII.

were also somewhat inflexible and rules/process-oriented. In contrast, NGO community centres were more limited in the scope of what services they could offer and refer, but they were also more flexible and results-oriented. The third main Facility protection service provider, MoFLSS SSCs, still had room for improvement. SSC case management seems not to have been consistent, the range of services offered was somewhat narrow and not well-differentiated from other service providers (not focused on the comparative advantages of SSCs as GoTR institutions), and their assistance was heavily based on rules and processes.

The main tool introduced by the Facility to sharpen focus on protection was the package of guidance and funding for case management and individual protection assistance. This was effective in raising protection awareness on the part of IPs and in obtaining more protection outcomes, but it was not popular with the IPs because of its rigidities and bureaucratic requirements, and it is not likely to remain used by IPs after the conditional support from the Commission ends.

Regarding services to address the main protection risks faced by refugees, the Facility made significant efforts on all fronts, but was held back by GoTR policies on outreach and registration, and also did not seem to have the programme and policy leverage to overcome structural protection problems for refugees that are also prevalent in Turkish society (for example child labour and early marriage). Areas where the Facility could place more effort, and where the evaluation team thinks progress could be made, are addressing the particular problems of seasonal agriculture workers (SAWs), out-of-school children, refugees needing psycho-social support and non-Syrians generally. Areas where the EU could use the policy leverage afforded by Facility funding to advocate for change include relaxing restrictions on NGO registration and outreach (this could be a condition of direct grants to MoFLSS), and modifying the regulations so that SAWs and refugees who are out of province for reasons of employment are able to access social services wherever they are working in Turkey.

v. Other factors causing changes in access to protection services

Beyond the technical factors of protection services (eligibility, registration/regularisation, service supply and referral), the main factors affecting refugee access to services were GoTR policy, and culture. Notwithstanding the technical shortcomings described in preceding sections of this report, one needs to remember that the general context for refugee protection and access to services in Turkey is very favourable; more favourable than in Lebanon and Jordan. Refugees in Turkey are not confined to camps: they are able to work albeit informally; they have access to government health and education services; they have some access to specialised government services such as the *SONIM*; and the host population remains welcoming. All of that is provided to refugees even without the Facility, although the Facility has certainly helped to bridge refugees to those underlying rights and services. To a large extent, this conducive protection environment is thanks to the policy commitments of the Government of Turkey, and to the resources provided by the Turkish taxpaying public.

In the opinion of the evaluation team, some of the successes and gaps in access to services can be ascribed to cultural factors[416]. On the part of Turkish service providers, government and non-government, there is a culture of welcoming and of assisting the poor – in particular Syrians, and among Syrians there is a strong emphasis on helping children. However, in the GoTR institutions in particular, there are also cultural blind spots, where officials do not recognise some risks or feel that it is their responsibility to address them. Among these blind spots we can consider psycho-social needs resulting from the refugee experience, and ‘double disadvantaged’ groups such as LGBTI, ethnic and religious minorities, sex workers, addicts etc. Refugees also have their cultural biases. Among these we can consider the low participation of refugee women in the (informal) labour force, the low priority some parents place upon education (not all the 400,000 out-of-school children are absent because of life-and-death economic choices facing their families), the reluctance by some refugees and especially men to seek psycho-social support, and the continuing parental practice of allowing (sometimes encouraging) children to work, and girls to marry early. These are areas where the Facility has made sincere efforts, but seems to be pushing against cultural factors that are more powerful than the Facility.

[416] This term is intended in a very broad and general sense, not aiming to distinguish between religious, ethnic, linguistic, socio-economic, class or other factors.

3.3.4. Contribution considerations

Relating to providing basic services, the two most important packages of services to refugees in Turkey were provided by the government: health, education. The contribution of the Facility was to increase refugee access to those essential services, and also to increase the quantity and quality (refugee receptivity) of those services. The other Sector Reports of this evaluation discuss those in more detail.

For targeted protection services, the Facility made significant contributions in several different ways. First and most importantly, a third essential service provided by the government was registration – essential because it unlocked refugee access to all of their rights in Turkey. The contribution of the Facility to registration was substantial and discussed in Section 3.1 of this report. Beyond registration, the Facility made a substantial contribution, arguably causal, to opening up MoFLSS and the network of SSCs to refugees. Even though the delivery of services by SSCs is still far from reaching its potential, the opening up of this government service channel was a very important breakthrough in protection. The Facility also contributed to the direct provision of GBV services through migrant health centres, and to providing a range of counselling services through community centres. Some NGOs were working in areas that were gaps in government delivery (PSS); and for supporting LGBTI refugees and SAWs, the NGO services were the only services received by refugees.

The area where the Facility made a particularly strong contribution was the system of case management and referrals designed by the Commission's humanitarian team at the outset (OICR), which included the PDMM protection desks, systematic referrals from the ESSN and CCTE programmes, legal services and, above all, the system of case management and individual protection assistance through community centres. Taken together, this was a robust package of support for referrals, and created the bridge that connected refugees to their protection services.

Areas where the Facility's protection contribution could have been stronger were in reaching SAWs and non-Syrians. Finally, and despite some efforts by the Facility, there was little progress in four areas of great concern for protection, but these were areas where the constraints were more political and cultural: outreach, registration (specifically registration of non-Syrians and regularisation of Syrians), child labour and early marriage. In these areas the whole humanitarian response was weak, and all actors were constrained by the same factors.

3.4. **Judgement criterion 11.4:** The Facility has put in place provisions for the sustainability of protection interventions

3.4.1. 'Sustainability of protection services' as an evaluation criterion

Sustainability of protection services was not a planned outcome of the Facility Tranche I, it is not a dimension of Facility reporting, it is not captured by the Facility Results Framework, and it is not a component of the reconstructed intervention logic. Furthermore, the Commission's humanitarian team is responsible for most of the protection-focused programming, and does not usually aim for their time-bound and delivery-oriented humanitarian responses to become sustainable. And finally, this is the evaluation of Facility Tranche I, and sustainability would be more likely measurable after Facility Tranche II.

The question of sustainability is nevertheless relevant, given the imminent scale-down of humanitarian activities in Turkey as the Facility transitions firmly towards development approaches mainly through GoTR systems.

The clearest statement of the Facility strategy for sustainability in the protection sector is found in the 2019 *Note on sustainable transition* (see Box 7)[417]. Using the four areas of intended focus for protection in Facility Tranche II as a guide, the analysis below looks at UN and NGO support (**filling gaps**) under indicator JC 11.4.1, then at GoTR support (**SSCs** and **national institutional capacity**) under indicator JC 11.4.2, including an examination of the handover of protection from humanitarian to development actors. Finally, under the contextual analysis, this section looks at the fourth component of the protection sustainability strategy, **advocacy**.

For this part of the evaluation, the team relied heavily on the interviews with Facility partners and stakeholders, as well as assessment of the Facility Tranche I actions, in particular through review of the project documents, which usually discussed some aspects of sustainability in the project proposals as well as in the final reporting and staff reviews.

Box 7 Note on sustainable traction

'Under the second tranche, the focus should be on ensuring the sustainability of Facility achievements in the protection sector. This should include measures to build local capacity, including of non-governmental actors, strengthening of policies and institutional capacity to bolster the delivery of protection services by the Turkish authorities and national CSOs.

The Facility should continue to promote the protective environment by increasing refugees' equitable and meaningful access to social services with a handover of the support to national institutions and development actors. Protection actions should focus on four specific priority areas:

- Supporting **Social Service Centres**, possibly complemented by further protection schemes run by the Turkish government, such as mobile outreach to children at risk and specific care for elderly refugees, all with a view to strengthen the delivery of public services sustainably;
- Increasing **national institutional capacity** to improve refugees' protection and social inclusion, including but not limited to registration, meaningful and equitable access to social services and ultimately formal employment: prioritise addressing barriers to inclusion into national services, active labour market activities and social assistance schemes, including increased outreach activities and establishment of referral integrated pathways;
- **Filling gaps** to respond to specific refugee protection needs that cannot be fully addressed by national systems. Targeted and locally adapted protection services to specific at risk groups and individuals.
- **Advocacy** to promote access to registration and civil documentation, as well as responses to the needs of specific at-risk refugees to ensure that the most vulnerable individuals and groups have access to protection and social services.'

[417] EU. (2019). 12th Meeting of the Steering Committee. *Note on Sustainable Transition*

Table 19 Summary of observed outcome: strengthening access to specialised protection services

Expected outcome	The Facility has put in place provisions for the sustainability of protection interventions
Observed outcome	Facility support for GoTR and TRCS service delivery has enhanced prospects for sustainability of some protection services, but NGO service delivery is not sustainable and will require continued external support.
Facility results contributing to the outcome	**Indicator 11.4.1:** Extent to which humanitarian protection interventions have established links with non-governmental support programmes to ensure ongoing access to legal and other protection services. NGO services are inherently unsustainable unless they benefit from a predictable philanthropic base, are financed by the government (donor or national), or charge some sort of fee for service from beneficiaries. International NGOs are unlikely to receive this sort of support, but national NGOs might, in particular TRCS and UTBA, both of which have legislated special status with the government, and GoTR financial support. **Indicator 11.4.2:** Extent to which humanitarian protection interventions have established links with governmental support programmes to ensure ongoing access to legal and other protection services Some aspects of humanitarian protection in Turkey are governed by legislation, notably the LFIP and the accompanying TPR. Other aspects of protection, including the sustainability of GoTR programmes, are public policy choices. Sometimes a donor such as the EU can influence these public policy choices, and help shape both the direction and the scale of GoTR support for refugee protection. The analysis below examines sustainability from both the NGO and government viewpoints, and also assesses how well protection is being handed over from humanitarian to development actors as the Facility evolves from Tranche I to Tranche II.

i. Hypothesis on the Facility's sustainability

On the NGO side, it is expected that most INGO and NNGO activities will wind up in an orderly fashion, and hand over a few remaining aspects to TRCS, UTBA and government for continued implementation at a reduced scale. TRCS and UTBA are expected to continue providing refugee services indefinitely, although at a smaller scale than under the Facility. Some UN programmes are expected to continue at a reduced scale.

On the government side, it is expected that core services will continue to be provided by all the major concerned ministries (DGMM, MoFLSS, MoH, MoNE), in accordance with legislation. However, it is also expected that the quantity and quality of services to refugees will diminish even as they increase their geographic reach (broad but shallow coverage), and that inherent preferences in the Turkish government system will be accentuated (favouring Syrians, favouring protection issues that are within the mainstream of SSCs). Finally, it is anticipated that municipal authorities will play a greater role as refugees integrate and become more confident social and economic actors in their communities.

3.4.2. Assessment of the likely sustainability of Facility protection interventions

The Commission's DG ECHO is the Facility channel for most of the protection activities in Facility Tranche I, and its general strategy for sustainability is clearly laid out in every HIP since 2016: it consists of consultative planning, mainstreaming, and then handover to development donors and government systems (see box opposite).

> 'Humanitarian actions supported by ECHO under the Facility have been and will continue to be developed in close collaboration with other EU instruments as well as with the Government of Turkey, while prioritizing the integration of humanitarian safeguards. As such, the assistance strategies described under this HIP aspire to develop workable models to address the basic needs and protection of vulnerable populations of concern that integrate their transition to development and government ownership. To restate: pre-defined exit strategies for transition to development programmes or integration with government services will be expected of all ECHO supported actions' – *HIP 2016*

In practice, few of the reviewed projects in Facility Tranche I gave significant consideration to sustainability and exit strategies[418]. However, sustainability and transition became more prominent in Tranche II. The Tranche II projects were not considered for this evaluation, and this question of sustainability should be further assessed in the eventual Tranche II evaluation.

i. Filling gaps: sustainability of UN and NGO protection interventions

a. UN agencies

UN agencies have received the vast bulk of humanitarian funding under Facility Tranche I. This funding has in turn been split between the UN's own work (UNHCR's technical support for DGMM capacity-building, UNICEF's technical support for child protection, and UNFPA's technical support for social policies including social assistance and GBV), pass-through funds for government programmes (registration and verification, SSCs, CCTE, ESSN), and sub-contracted NGO programming. Even after development actors have taken over most of the pass-through funding for government programmes, the UN agencies are likely to receive small amounts of funding from donors for their work with NGOs (especially UNHCR, and UNFPA for its work with double disadvantaged refugees outside the government safety net). Most importantly, UN agencies' quiet, steady, core work to strengthen government systems and accompany government delivery will likely continue indefinitely, and is inherently sustainable.

b. TRCS community centres

The Commission action documents for TRCS referred in passing to sustainability, but did not provide any details in the proposals or in the reporting. The project with TRCS has an output for sustainability: Output 3.1: '[TRCS has] sustainable institutional and organisational capacity and [is] collaborating on various levels (local, regional, national) with relevant authorities and communities,' but the only indicators of sustainability are numbers of staff and volunteers trained and their percentage level of adequate knowledge – neither of which usefully measure sustainability[419]. In sum, none of the Facility projects with the TRCS seriously considered sustainability of services or exit.

> 'We believe we should put more emphasis on livelihoods. In the following 4–5 years, people will have to make a living on their own and have a profession' – *TRC community centre manager*

Nevertheless, there has been an important transformation in the orientation of the TRCS community centres over the life of the Facility. Initially they were focused on in-kind relief, then in a second stage (with humanitarian support) they built up a range of services around protection, and now, in a third stage, the focus of services has moved to livelihoods. This reflects the change of refugee priorities described earlier, as refugees' immediate material and protection needs have mostly been met, and their concerns have turned towards the skills and connections needed for integration[420]. Evidence of this change in refugee priorities was also found in UNHCR's 2018 Participatory Assessment, which focused on refugee concerns about livelihoods[421]. From a larger point of view, this

[418] Review of Facility Tranche I protection project proposals in HOPE.
[419] *Madad Dashboard*, provided by Danish Red Cross.
[420] KIIs.
[421] *Participatory Assessment* (2018), UNHCR. Internal Report.

suggests that the bulk of the protection job has been done, and that the heavy lifting has moved to socio-economic actors.

The main sustainability challenge regarding the TRCS community centres is their high cost in relation to their beneficiaries: there are 16 well-established full-service community centres in 15 provinces, providing a comprehensive service to relatively few refugees – a 'five-star approach' that is most unlikely to be maintained at its current scale[422]. At least one knowledgeable observer considered that, in retrospect, it might have been better to have a smaller set of core services with more outsourcing to specialised partners of activities like livelihoods that are not a Red Cross/Red Crescent comparative advantage[423]. TRCS is considering if it can lower its costs by getting more engagement with provincial and municipal governments, in order to obtain rent-free accommodation and some local financing of activities, but these are tentative steps at this point[424].

The big question facing TRCS community centres, as the development and humanitarian projects are ending, is whether the government will step in. On this matter, the interviewees were divided. On the one hand, there is some sense of competition between SSCs and community centres, and MoFLSS reportedly made a policy statement that Turkey would not continue with the TRCS community centre model[425]. However, this was somewhat contradicted by other government statements, the President reportedly sees TRCS as 'the Turkish Airlines of the humanitarian world', and academics regard TRCS as a core component of Turkey's foreign policy strategy of 'humanitarian diplomacy'[426]. TRCS itself is not shy in its ambitions: see its Vision statement 2016–2020 (opposite). TRCS believes strongly in their brand, and as far as the evaluation team could determine from interviews, TRCS intends to maintain its services and even expand, assuming that government or donor funding will continue, simply because they are so essential to the refugee support system in Turkey[427].

> 'Organisation which is taken as a model in Humanitarian aid service in Turkey and in the world; and the Organisation which is with people in their hardest time' *TRC Vision statement from 2016–2020 Strategic Plan*

One way or another, the evaluation team concludes that TRCS will remain standing as the single largest and strongest refugee support agency in Turkey[428]. However, how it is funded will also determine what it focuses on. TRCS' core business and Red Cross/Red Crescent roots are relief supplies and assistance to large numbers of people in times of disaster. If it is funded by some combination of development actors, the Turkish government and local philanthropic supporters, which seems the most likely scenario, then the consensus of interviewees is that it will probably reduce some of the more 'humanitarian protection' work that is there now, and continue the move towards livelihoods[429].

c. Legal aid services

Through two successive humanitarian actions (one in Facility Tranche I, and one in Tranche II), UNHCR has worked with UTBA to train lawyers and judges in refugee law, build an online case management system, operate specialised legal clinics and deliver legal aid services through 18 bar associations. However, even though Syrian and Turkish citizens are subject to the same laws and have the same rights to legal representation from the bar associations[430], UTBA does not receive enough government funding to meet domestic demand, and bar associations will not usually take refugee cases unless the fee is covered by the UNHCR project[431]. Now the precedent is established for donors to fund

[422] KIIs. High-cost 'quality' approaches seem to be the preferred approach for the government's showcase refugee programmes, such as the Temporary Accommodation Centres.
[423] KII.
[424] KII.
[425] KII
[426] Altuninik, M. B. (2019). Turkey's Humanitarian Diplomacy: The AKP Model, and Davutoglu, A. (2013). Turkey's humanitarian diplomacy: objectives, challenges and prospects.
[427] KIIs.
[428] KIIs.
[429] KIIs.
[430] This goes beyond a right. Only UTBA has the authority to provide free legal representation in Turkey: NGOs cannot provide this even if they have the resources.
[431] KII.

services that theoretically should be provided by the state, there is an expectation that donors will fund legal aid for refugees, and a bigger risk that services will be cut when the funding stops[432].

State funding for legal aid through UTBA is provided through the budget of the Ministry of Justice. In an attempt to reach towards sustainability, UTBA drafted a legislative amendment (with help from United Nations Development Programme (UNDP) and UNHCR) that would have provided more structural government financing for refugee legal aid. This draft amendment was very complex, as it required amendments to 14 other pieces of legislation governing various aspects of UTBA[433]. It was reportedly approved by the Minister of Justice, but not presented to Parliament before July 2018, when constitutional reform was enacted that converted Turkey from a parliamentary to a presidential system. As a result, all of the earlier work on a parliamentary amendment has apparently been lost, and what would now be required is a presidential decree, which will need the President's support and a whole new drafting and approval process.

In the end, capacity for legal services has been built by the Facility, but as a consequence of this triple constraint, a UTBA monopoly on the provision of free legal representation, insufficient state resources, and no dedicated allocation for refugee legal aid, it seems that legal aid for refugees in Turkey will need continued donor financing for the foreseeable future.

d. NGO services

NGOs are themselves rarely sustainable, although some can benefit from a philanthropic base or government financing. However, several interviewees remarked that staff working with NGOs had introduced more durable skills and awareness into Turkish society. All projects with NGOs and UN agencies have recruited and trained a large cohort of young Turkish citizens to be aware and equipped to support refugees: this substantial cohort of dynamic young Turkish professionals (a 'social job market') has a new mindset on integration and inclusion, and might in the long run influence how Turkish society sees refugees and human rights in general. If this does take place, it would be an aspect of sustainability that goes beyond the projects.

Most INGOs have worked in close association with a Syrian local counterpart organisation, and have invested substantially in building local capacity – but that was the only gesture towards sustainability that could be observed through document review. The evaluation team could not find evidence of a well-developed exit strategy in any INGO documentation in the Commission's humanitarian database HOPE[434]. Some INGOs are likely to be supported for several years to come by donors including the EU, which sees INGOs as essential for 'filling gaps', i.e. providing support to 'double disadvantaged groups' and unregistered refugees who fall outside the scope of government agencies[435]. Some INGOs are able to keep costs down by piggybacking on office and staff resources working on the cross-border programmes into Syria out of Gaziantep. However, the costs of working in Turkey are relatively high, the operating environment is difficult, and the government will not finance INGO projects. As a result, INGOs are very unlikely to be able to continue their work in Turkey after external donor financing ceases.

Some of the smaller NNGOs addressing 'niche' protection needs (asylum seekers in detention, LGBTI, SAWs, Dom, GBV) existed before the recent refugee influx, usually based on a combination of small-scale philanthropy, volunteers and direct funding from affiliate INGOs. Possibly with a view to sustainability, organisations like HRDF, Refugee Rights Turkey, Mavi Kalem, KAOS and Development Workshop have resisted expanding and diversifying rapidly. Instead, they made strategic decisions to keep a few offices with focused services, and then deliver those services at small scale with quality, and over a longer time frame[436]. These values-driven specialised organisations might be able to provide limited protection services indefinitely, albeit at a limited scale. For the most part, the specialised NNGOs working with refugees in Turkey appear to be lean and effective, and the most efficient way to support them in the long run is probably through UNHCR, which can provide long-term accompaniment and some measure of cushion in the event of sudden policy changes.

[432] KIIs. A similar risk faces SSC services to refugees.
[433] KII.
[434] Recall that the Evaluation Team did not consider projects being implemented in Facility Tranche II.
[435] KII.
[436] KIIs.

Some other small NGOs might close as we know them, but live on in a different form: they might be handed over to a municipality, or become repurposed according the interests of their donor. For example, private funding from the Gulf States might turn some NGO facilities into schools for Arabic learning and Islamic teaching[437]. This sort of organic evolution is not necessarily a problem. It can be part of a healthy renewal as well, but the problem is that many NGOs do not think ahead and plan these transitions and closures properly[438].

Larger NNGOs that provide a fuller range of services, such as Support to Life and ASAM, have strong capacity, but they have been built up on the basis of project funding, and despite some optimism expressed by EU officials that they might be able to survive without donor funding[439], the evaluation team is not so convinced that they are sustainable.

EU Trust Funds are instruments designed to address complex problems in holistic ways, and usually have the advantage of combining aspects of humanitarian, development and peace programming. EUTF Madad was designed along these lines, and allowed direct long-term funding at scale for two key 'full-service' NNGOs, TRCS and ASAM – something that Commission humanitarian regulations do not allow, and that DG NEAR cannot do with the Facility funds[440]. The closure of EUTF Madad is leaving a big hole in the EU's system of protection funding that NGOs were hoping could be filled by some sort of 'NGO window' in Facility Tranche II[441], but the evaluation team was informed that the Facility Tranche II funding has now been allocated, so there is no more opportunity to discuss this idea[442], even though the value of this was reportedly recognised in a meeting between EU senior management and NGOs in Turkey[443].

In a closer look at ASAM, the evaluation team identified three factors that limit ASAM's prospects for sustainability. First, despite the quality of ASAM's work and the dedication and professionalism of their staff[444], ASAM is entirely dependent on donor funding: offices open and close, staff are hired or moved around, sectors are created and disappear – all according to donor funding. Unfortunately, there has been little investment in core institutional capacities, there is no strategic planning, and no sustainability discussion[445]. In interviews with the evaluation team, it seemed that the general assumption among ASAM staff is that the crisis is continuing, and ASAM is doing a good job, so the donor money will therefore keep coming[446]. A second constraint on ASAM's sustainability is the government itself, which clearly favours TRCS as the long-term full-service NGO agency for refugees, and has little incentive to create the conditions for ASAM to become strong and sustainable[447]. And finally, it is hard for ASAM to become sustainable because they have difficulty retaining key staff. Many staff join ASAM young and are trained up, then they move on to other organisations that can offer better conditions and better tenure. In this way, ASAM seems to be a training ground for TRCS and UNHCR: this is an important contribution to the overall system, but does not help ASAM's own sustainability[448].

> 'When people with trauma demanded to continue their individual PSS sessions, we had to reject them. When we started working for the Madad project, people here were resisting to attend PSS sessions and we broke this resistance with groups sessions and workshops. After our efforts, people started to ask for individual sessions but we cannot continue providing these sessions anymore' – *ASAM community centre manager*

[437] KII.
[438] KII.
[439] KIIs.
[440] DG NEAR can fund NGOs directly through the Instrument for Pre-Accession 2 programme for Turkey, but the team was informed that the negotiated terms of the call for Facility Tranche II excluded direct grants to entities that are not 'pillar assessed'.
[441] KIIs.
[442] KIIs.
[443] KII
[444] KIIs.
[445] KIIs.
[446] KIIs.
[447] KIIs.
[448] KIIs.

These shortcomings were evident in the way that ASAM has handled the end of project T04.56[449]. At the end of this project, and apparently without forward planning, ASAM centres supported by that project suddenly stopped providing protection services. This meant that protection work stopped but social cohesion continued (funded by project T04.170 or by other donors), and protection staff were reassigned to new sectors[450]. Since the closure was not properly prepared, many beneficiaries were reportedly left stranded, sometimes in the middle of an assistance programme. There did not seem to be a robust system for wrapping up active cases or handing them over to another agency[451], although reportedly some beneficiaries were later transferred to other service providers[452]. Some of this abruptness can be ascribed to the unusual circumstances of COVID-19, but not entirely.

> 'We dropped the protection services and are continuing with social cohesion activities but it is hard to tell this to beneficiaries. Imagine that you are being invited to social cohesion activities by an NGO which was supporting you with protection services before' – *ASAM community centre manager*

The evaluation team did consider and discuss with stakeholders whether ASAM should develop a strategic plan with a multi-year programme, in order to attract some structural financing and put ASAM on a more sustainable footing. However, the team concluded that this would not be likely to succeed in getting enough funding in the post-EUTF Madad era. The further conclusion of this discussion was that ASAM seemed to do best when it remains agile, locally anchored and low key.

ii. Government services

It needs highlighting, again, that the most important steps towards sustainability have been taken by the Government of Turkey. This is rooted in the generous provisions of the LFIP, and complemented by a number of tactical policy decisions such as closing the Temporary Education Centres and taking over registration of non-Syrians. Even as we discuss below the continuity of various special programmes of supplementary support to refugees, we need to remember that including refugees in government programmes (health, education, social assistance) provides them with a firm foundation for their sustainable future in Turkey.

a. Mainstreaming of protection in regular government services

The Facility's two broad assumptions for sustainability of protection were that protection would be mainstreamed, and that the government would eventually pick up funding of social protection. It was not expected that NGOs' activities delivering 'humanitarian protection' would become sustainable, and hence the Facility anticipated the need to provide humanitarian funding for these activities for some time to come (see opposite).

> 'Protection would be mainstreamed and civil society would continue to be supported in addressing specific protection needs' – *DG ECHO statement on sustainability and transition of protection: 12th Steering Committee Meeting*

For mainstreaming, as discussed earlier, the evaluation team concludes that the government is likely to continue to include refugees within government programmes (health, education, social assistance etc.) for as long as government policies and regulations support this, which provides a solid base of sustainability for the vast majority of Syrians in Turkey. However, government programmes are unlikely to address (mainstream) the needs of unregistered refugees, or socially marginalised 'double disadvantaged' refugees including some non-Syrians, and as a result there will be a smaller group of refugees that are not fully covered by government programmes. That will require some measure of external assistance for the foreseeable future.

[449] Readers should recall that there is a second ASAM project 2018/T04.170 that is still operational, but as far as the evaluation team could determine there is no sustainability plan for T04.170 either.
[450] As far as the evaluation team could see, staff who were protection experts were reassigned to other sectors without regard to whether they had relevant experience or qualifications.
[451] Some cases for GBV were handed to its partner Mudem/Refugee Support Centre.
[452] KIIs.

Funding is at the core of the dialogue between the EU and Turkey as Facility Tranche II funds are now fully allocated. It appears that every day refugees (mainly Syrians) are becoming more settled in Turkey and yet, at least in the current economic crisis, also more in need of assistance than ever before. It seems that the EU is quite pragmatic and accepts that continued EU assistance will be necessary. A signal of this came when the EU agreed to top up the ESSN and CCTE by EUR 485 million beyond the EUR 6 billion allocated to the Facility, in response to the continuing needs of the refugees in Turkey, including the exceptional stresses experienced by refugees as a result of COVID-19.

> 'it had become clear that there could be no guarantee of Facility sustainability exclusively based on continued Turkish support. Turkish calls for continued EU support had increased over the last few months and [Turkey] had made it clear that it would not take over the full scope of EU financed programmes' – *Draft minutes, 13th Steering Committee Meeting*

b. Registration

Two important steps for sustainability were taken when DGMM built their comprehensive Syrian refugee registration system in 2016/2017, and then in September 2018, when UNHCR stepped back from non-Syrian registrations and refugee status determination[453]. In another positive step, DGMM has decided to maintain protection desks in several PDMM offices, with a further round of support from DG ECHO and UNHCR (under Facility Tranche 2). However, DGMM staff were concerned that the Ministry might not be able to afford to keep up such a high level of service, and there were signs in some locations that staff cutbacks were affecting this added protection function[454]. UNHCR has argued that sustainability of protection would be better anchored if the Facility would also provide a direct grant to the DGMM's Directorates responsible for refugees[455]. The evaluation team can see how this would further strengthen capacity[456], but is not convinced that this would necessarily increase sustainability.

> 'I do not think that unless the project continues, the same quality of services would be provided. We can only provide those services within our own capabilities and resources. Given the currently available resources and the high influx of refugees, we will not be able to cover all these people' – *PDMM officer*

c. Social service centres

From a protection viewpoint, a major difference between DGMM and MoFLSS is that DGMM has a long-standing and facilitative relationship with UNHCR, and is open to continued technical advice and 'accompaniment' from UNHCR as it grows into its expanding role. In contrast, MoFLSS does not have the same sort of relationship with other UN agencies, partly because its mandate is broader and overlaps with those of UNHCR (refugees), UNICEF (children) and UNFPA (GBV). These three UN agencies have established a task force to better organise their support for SSCs, but unfortunately the task force is not fully engaged with MoFLSS or with the Facility, and therefore not yet able to contribute their collective wisdom to improving the SSCs' performance in protection[457].

Although beyond the scope of Facility Tranche I, the evaluation team expects that the new Facility direct grant for MoFLSS is a step forward for sustainability in two respects. First, it will continue to support the already existing SSCs (27 additional SSCs were established under the Facility Tranche I and currently 355 SSCs are present across the country). Second, the grant will provide core support to reinforce the existing systems and also will not pay salaries. These are not in themselves guarantees of sustainability, but the more alignment there is with government systems, the easier and more likely it becomes that the government could eventually absorb these services into their regular work. While the evaluation team is optimistic that having refugees included within the mandate and work practices of

[453] KII. Readers will recall concerns expressed earlier in this report about dilution of the quality of registration and status determination processes after they were handed over fully to DGMM. UNHCR continues to provide steady, practical, relevant and low-key support to DGMM in these areas: KIIs.
[454] KIIs.
[455] KII.
[456] One capacity development in DGMM that would be very welcome and enhance effectiveness and efficiency throughout the system would be a unified case management system attached to refugee registration, so that cases could be coordinated and referred between government agencies and NGOs The ESSN 2 Mid-Term review called for this, when it recommended that 'ESSN, in conjunction with the [TRC] protection unit, should explore possibilities to work with UNHCR to build a comprehensive protection case registration system. This should include protection cases registered through PDMM or SASF.'
[457] KIIs. Readers will recall that there is an exception to this in the Marmara region, where there is a long-standing locally established partnership between UNHCR, municipalities and PDFLSS: KIIs.

MoFLSS will enhance sustainability, the team remains concerned that this will not provide an improved quality of service (services will be 'wide but shallow'), that the SSCs will continue to be under-resourced and overloaded[458], and they will still not improve their linkages to CSOs[459]. In sum, the evaluation team expects that the Facility's direct grant with SSCs will provide more sustainable support for refugees, but that this support will not be on a larger scale or greater quality.

d. Sustainability of other MoFLSS programmes for refugees

MoFLSS is also a key player in the future of social assistance to refugees in Turkey. With a second Facility direct grant under Facility Tranche II, MoFLSS will manage a new social assistance programme that is destined to replace part of the ESSN and capture a smaller number of the most vulnerable refugees (elderly-headed families, single-parent households with no other adults in the family and with at least one child under 18 years old, and families with one or more persons living with disabilities). It seems likely that the transfer value of this new MoFLSS project could be based on the regular social assistance programmes of MoFLSS.

e. Sustainability of GBV services

The WGSS project evaluation was somewhat optimistic about the sustainability of GBV services, although it anticipated a drop in quality as the outreach and GBV technical support end:

> *Sustaining the contribution of the WGSS project to fill the gaps in access to SGBV services for Syrian women-girls (achieving more than 100% of targets for promotion and case response and 73% for MHPSS counselling …) has been partially secured due to the transfer of staff. In the conversations, the providers expressed that after the transfer of the WGSS to the MoH, the women's demand for SGBV services will change due to the loss of the outreach services of the health mediators, particularly those services related to identification of vulnerable cases at household level and their referrals to the Facility. Additionally, it was pointed out that the SGBV case response management can be affected because it is likely that the transferred psychologists will probably no longer have access to the SGBV training packages[460].*

The evaluation team shares this concern, especially if the other components of the GBV system (NGO referrals and SSC services) also diminish.

f. Municipal services

In the long run, working more with municipal authorities might lead to more sustainability, as it is municipalities that have the day-to-day challenge of managing populations and their problems, and who have the most immediate interest in social cohesion. Turkish municipal authorities are not currently permitted by law to use state resources to support non-citizens, and national transfer payments are only based upon the population of citizens. However, many municipalities do support refugees in different ways, out of compassion and/or concern for social cohesion. One group of academic experts is advocating for municipalities to be allowed to provide services to refugees, and for a rebalancing of the funds received from the national government to take into account the refugee populations, preferably with the additional funds provided by the EU[461]. This argument is taken further and built up into a three-part prescription for more Turkish stakeholder engagement, a national strategy, and more burden-sharing with donors:

> *the Turkish government would be well-served to engage the experience and know-how of municipalities and civil society to develop and implement a strategy for integration. In turn, the international community should be more receptive to Turkish government efforts to achieve a greater say for refugee hosting countries and to ensure that burdens are more evenly shared.[462]*

[458] KIIs.
[459] KII.
[460] Calvo, A. J. et al. (2019). Evaluation of Women and Girls Safe Spaces (WGSS) Project. DARA
[461] (2019). Demographical Development of The Syrian Refugee Population And Its Potential Impacts on the Education, Employment and Municipality Services in Turkey In Near Future, QUDRA. Similar arguments are advanced by the same author in (2020) Syria Barometer 2019, Ankara.
[462] Kemal Kirisci, Jessica Brandt, Murat Erdogan. (2018) *Syrian refugees in Turkey: Beyond the numbers*, Brookings.

Engaging with municipalities is a somewhat new development. Several interviewees agreed that, if central government allows it (which they might not) this could be a positive way forward[463]. Even if the engagement is initially stimulated by external donor financing, in the long run it could prepare the ground for better integration of refugees into municipal services, and eventual sustainability.

iii. Sustainability of protection in the handover from Facility Tranche I to Tranche II

Throughout the life of the Facility there have been several transitions, and for the purposes of this discussion we will consider the transfer from humanitarian to development approaches, from UN/NGO delivery to government services, and from 'humanitarian protection' to 'social protection.'

The transition from humanitarian to development approaches is entirely desirable: it is a clear move towards sustainability fully in line with the principles of the humanitarian-development nexus, the *Global Compact for Refugees* and the EU policy statement *Lives in Dignity.* In the Facility, there was evidence of nexus-thinking from very early on in the response, and these transitions were well under way at the time of this evaluation.

The transition from UN/NGOs to government services is likewise desirable, but as discussed earlier, in this process there was some loss of protection service quality, together with substantial gains in protection service coverage, as well as in sustainability. We have characterised this as a transition in protection services from narrow and focused, to broad and shallow.

Finally, in the transition from 'humanitarian' to 'social' protection, the evidence suggests that the vast majority of refugees in Turkey (especially Syrians) are obtaining, and are likely to continue to obtain, a high level of social protection. At the same time, a small but still important proportion of refugees are likely to remain outside the social protection system: notably unregistered refugees (Syrian and especially non-Syrian) and marginalised social groups. For these groups, it is necessary to maintain a thread of humanitarian protection support through UN agencies and NGOs – support which cannot aspire to become sustainable at scale.

3.4.3. Contextual analysis of sustainability of protection

i. Contributing factors to sustainability

After 8 years, the government commitment to support refugees remains high, especially for Syrian refugees. This is for at least three underlying reasons: demographic, economic and geopolitical. Demographically, Turkey is already an ageing society, although there is a measurable east–west divide as western Turkey has an ageing demographic closer to a European than a Middle Eastern profile. Second, and notwithstanding recent economic problems, Turkey has enjoyed a prolonged period of economic growth, as a result of which a large segment of the population has moved upward to better jobs, leaving a structural labour deficit in informal work such as construction, textiles and agriculture. The combination of demographics and growth created labour shortages in certain areas (sectors and regions, especially the Marmara region) that refugees can and do fill without competing with Turkish citizens. In short, the Turkish economy needs refugee labour[464]. The third factor underpinning the welcome for Syrian refugees in particular is the long-standing policy position of Turkey presenting itself to the Muslim world as a champion of refugee rights, and as hosting their Muslim refugee brothers and sisters. It is these factors that seem to have driven favourable government policies on registration and rights, and the extraordinary welcome provided by the Turkish people. As a result of these underlying factors, refugees are now integrating into Turkey – with ups and downs – but as every year goes by, their level of de facto integration becomes greater, and their risks of refoulement diminish.

ii. Constraining factors to sustainability

Counterbalancing these conducive factors, as explained at length earlier in this report, more recently there has been a rise in social tensions between refugees and host communities, and refugees have become factors in domestic political dynamics (e.g. the Istanbul removal policy of 2019), as well as in EU–Turkey bilateral relations (e.g. the late 2019 Turkish 'Operation Peace Spring' to create a safe zone in Syria, and the Edirne crisis of early March 2020). Furthermore, refugees themselves have reportedly

[463] KIIs.
[464] KIIs.

suffered a sharp welfare and protection downturn as a result of the recent economic crisis and compounded by COVID-19. In other circumstances these factors might have encouraged refugees to reconsider staying in Turkey, but unfortunately the political and economic situations in their countries of origin have also worsened (Syria, Iran, Iraq, Afghanistan) with the end result that staying in Turkey is still a better option than return. While the evaluation team's overall assessment is that factors favouring sustainable support for Syrian refugees are stronger than the countervailing factors, the heightened geopolitical pressures on Turkey increase the risk of sudden and unpredictable policy reversals especially for non-Syrian refugees, but even for Syrians.

iii. How well did the Facility address the constraints to sustainability?

The Facility has welcomed the government's commitments to support refugees in Turkey and has worked with the GoTR to achieve this goal. As part of this overall Facility strategy, the Facility has shifted the weight of funding and effort from humanitarian to development channels, and from NGO/UN delivery to implementation by GoTR ministries[465]. By thus aligning with the GoTR political will, and providing substantial additional resources to GoTR programmes, the prospects for programme sustainability are improved. However, as we have argued above there will be gaps in this transition: 'some people will be left behind'. To offset this gap, the Facility would need to continue to support some programming with a more specific 'humanitarian protection' focus – indeed, it would be desirable from a protection viewpoint, but this would not be sustainable.

To better address the constraints to sustainability of protection would require support from beyond the Facility, notably effective political engagement and advocacy on the part of the EU and likeminded donor governments. This need for an advocacy component was recognised in the 2019 Note on Sustainable Transition (see box), but this intended advocacy component of the strategy has not advanced very far. On the one hand, policy dialogue on the technical questions such as non-Syrians, out-of-province refugees, 'double disadvantaged groups', data-sharing, outreach and NGO operating space has made little progress. At the same time, the strategic policy dialogue between Turkey and the EU has been marked on the government side by requests for EU political endorsement of Turkey's regional political strategies, and for continued funding ('burden-sharing') for refugees in Turkey. On the EU side, the main policy message since late 2019 has been the EU's rejection of 'Turkey's use of migratory pressure for political purposes' and reassertion of its expectation that 'Turkey will implement fully the provisions of the 2016 Joint Statement,'[466] implying the provision that 'Turkey will take any necessary measures to prevent new sea or land routes for illegal migration opening from Turkey to the EU, and will cooperate with neighbouring states as well as the EU to this effect.'[467] Given this trajectory of EU–Turkey policy dialogue, it seems unlikely that technical questions underpinning sustainability of protection will be accorded much attention by either party in the short term.

> **'Advocacy** to promote access to registration and civil documentation, as well as responses to the needs of specific at-risk refugees to ensure that the most vulnerable individuals and groups have access to protection and social services' – the fourth pillar of sustainability in the protection sector, according to the Facility's
>
> *2019 Note on Sustainable Transition*

3.4.4. Contribution considerations

The Facility strategy has appropriately been to mainstream protection in all sectors, hand over to government what can be handed over, and to maintain in the humanitarian space some support for protection risks that government is unlikely to address.

The Facility contributed somewhat to building the capacity of NNGOs, partly through UN intermediaries like UNHCR, UNICEF and UNFPA, but also through contract-holding INGOs with NNGO subsidiary partners[468]. Commission support for ASAM and TRCS through EUTF Madad made a particularly important contribution in this respect (more funding for capacity-building, longer-term funding, more flexibility). This investment in capacity-building should enhance the performance and sustainability of

[465] This was also an explicit recommendation of the European Court of Auditors: 'The Commission should develop and implement a transition strategy, with the final objective of handing over both humanitarian and non-humanitarian activities to the national authorities.'
[466] Statement of the EU Foreign Affairs Council, 6 March 2020.
[467] *EU–Turkey Statement*, 2016. More recent differences between the EU (Greece) and Turkey regarding Turkey's economic ventures in the Eastern Mediterranean have moved the dialogue still further from refugee protection in Turkey.
[468] Important capacity-building work is taking place in Tranche II through GIZ.

specialised NNGOs with values-driven support constituencies, but will not be sufficient for large multi-sector NNGOs to become sustainable. Unfortunately, there was little evidence of NNGOs planning for programme handover and orderly closure.

Through a number of initiatives (direct support as well as ESSN, CCTE) the Facility contributed substantially to building the capacity and protection work of TRCS, but the longer-term sustainability of TRCS will most likely be guaranteed not by the EU but rather by the Government of Turkey, who see TRCS as a strategic national and global partner, and 'too big to fail'. Finally, Facility support for protection through UN agencies (UNHCR, UNICEF, UNFPA) was helpful, but those agencies do not depend upon the Facility to sustain their activities in Turkey.

On the government side, the Facility contributed significantly to building capacity especially in DGMM and MoFLSS, and was instrumental (causal) in opening the door for refugees to access protection desks and SSCs. DGMM and MoFLSS seem likely to continue to provide these new services to refugees for the indefinite future, although the protection quality of those services is expected to diminish after the humanitarian funding reduces.

Strong points for Facility contribution were the support for DGMM protection desks and MoFLSS SSCs, the building of NNGO capacity (especially with support from EUTF Madad), and the deliberate planning to shifting programming weight from humanitarian to development channels.

Weaker points for Facility contribution were the absence of sustainability and exit planning (see socio-economic support sector report), the lack of progress in advocacy, and insufficient attention to protection mainstreaming in the development portfolio, as a result of which the Facility programming in Tranche II is expected to lose some of the protection benefits that were found in Tranche I.

4. Facility protection response to the COVID-19 crisis

4.1. Impact of COVID-19 on refugees in Turkey

This overview discusses protection-specific impacts and responses to COVID-19 in Turkey. However, because some measure of protection is provided by all sectors, and protection is furthermore mainstreamed in most activities, **a broader overview of the protection impact of COVID-19 on refugees in Turkey is provided in Volume III (Annex 1).**

Surveys conducted show that there is a differential impact of COVID-19 on refugees, depending upon their nationality and location. On the whole, non-Syrians are more heavily impacted than Syrians, and among non-Syrians the Afghans are most affected, followed by Iranians. According to the Protection Working Group (PWG) survey[469], Afghan refugees have suffered the most from loss or reduction in employment, experienced higher levels of stress, have the most difficulty accessing health and education services and are the most dependent on social assistance. The PWG survey also showed that there was a differential geographic impact of COVID-19, with refugees in Marmara region less able to cover their expenses (possibly because they were more dependent upon informal work than the Emergency Social Safety Net (ESSN), and also might have higher living costs). Furthermore, the protection-specific analysis showed that Marmara region had a slightly higher proportion of reported protection concerns than other regions.

Data captured by the PWG and supported by other NGO reports confirms three of the findings of the main protection sector report relating to refugee awareness of COVID-19 and their information sources.

1. Refugees think that they are not sufficiently aware of COVID-19, but when questioned they revealed that they are more aware than they thought. 'The results of the inter-agency assessment indicate high levels of both perceived and actual levels of COVID-19 awareness.'[470]
2. The main method that refugees use to obtain information on COVID-19 is social media, followed in the case of COVID-19 by public media (TV and newspaper) and then family and friends. Government sources are low on the list[471].
3. The vast majority of counselling and information services moved from in-person to online. It seems likely that this movement online will in the end be a system-wide structural shift in service delivery[472]: and that a consequence of this will be to increase the access gap between refugees with access to connectivity or technology – and those without such access.

Protection-specific impacts of COVID-19 on refugees identified by surveys include:

Social isolation – the PWG survey found significant increases in domestic and community stress and conflict among household members, and suggestions of small increases in domestic violence and conflict between communities[473].

Curtailed access to psycho-social services – PSS and mental health services provided by the Facility, government or others remained available (often online), but uptake by refugees was reduced, for example because MoH services were only made available in Turkish[474]. Refugees who were already socially isolated seem to have been particularly affected; for example, there was evidence that LGBTI refugees were less likely to get services[475].

[469] The Protection Working Group (PWG) has developed a standard methodology for COVID-19 impact assessment that brings together the work of 13 participating UN agencies and NGOs, and has published a report in June 2020 which provides a protection-sensitive perspective.
[470] Interagency protection sector needs assessment analysis (June 2020). Protection Working Group.
[471] ASAM (2020). *COVID-19 Salgınının Türkiye'de Mülteciler Üzerindeki Sektörel Analizi* [in Turkish]. Retrieved from: https://data2.unhcr.org/en/documents/download/76640. [Access date: 26.10.2020] Similar data was found by the Relief International survey.
[472] COVID-19 Needs Assessment Report (June 2020), TRCS.
[473] United Nations (2020). *COVID-19 Socio-Economic Impact Assessment Report*. P.93 TRCS also reported an increase from 12–36% in the reported incidence of stress disorders as a result of COVID-19.
[474] United Nations (2020). COVID-19 Socio-Economic Impact Assessment Report.
[475] Heinrich-Böll-Stiftung e.V (2020) *How does the COVID-19 pandemic affect LGBTI+ community in Turkey?.* Retrieved from: https://eu.boell.org/en/2020/04/17/how-does-covid-19-pandemic-affect-lgbti-community-turkey Confirmed by UNFPA's Modification Request to DG ECHO.

Evictions – many households were doubly affected by lost income and rent increases, leading to a situation where 16% of refugees in the south-east reported that landlords were threatening evictions (although by May 2020 the rate of evictions was still quite low at 3%)[476].

Travel restrictions – restrictions on inter-provincial travel affected SAWs, but they also affected regular workers and newly unemployed workers seeking to reunite with their families in other provinces, as well as non-Syrians seeking to travel to their designated satellite cities. It is likely that many refugees were 'stranded' out of province due to COVID-19 travel restrictions, and therefore unable to access some services in their provinces of registration.

Curtailment of direct protection services – several normal protection service providers closed between March and June 2020, including PDMMs (resulting in registration backlogs). Legal assistance reduced, and resettlement interviews and movements were suspended until July 2020, thus exposing some of the most vulnerable refugees to risks for longer.

4.2. Facility response

In general, the protection portfolio has adapted well to COVID-19, in particular the projects approved in 2018 and 2019 that were still being implemented when COVID-19 struck. While in-person services slowed or stopped across the board, partners responded in these ways:

1. Counselling, referrals and whenever possible social cohesion services moved to telephone or online delivery.
2. New awareness-raising content and campaigns were developed in Arabic and Farsi around COVID-19 and around the anticipated protection risks of COVID-19 (domestic and gender-based violence, child labour, child marriage etc.)
3. New surveys were designed and implemented to assess the needs.
4. New alliances were formed between protection actors (for example the PWG joint survey and analysis).
5. Previously unspent funds, contingency reserves and newly freed-up funds from curtailed activities were redirected to either in-kind assistance (food delivery, hot kitchens, non-food items, PPE, health kits etc.), or to cash supplements that were designed to match the TRY 1,000 COVID-19 transfers provided by the government to Turkish eligible citizens and to ESSN beneficiaries.

Most EU-funded projects in the protection sector in Turkey have unspent surpluses. As such, most Facility protection projects did not require additional funding in order to respond to COVID-19, but rather permission to reallocate resources and also to extend project durations. Note, however, that funding provided under HIP 2020 (including for example the cash grants provided by UNHCR to refugees who are not eligible for ESSN) was not funded from the Facility, but from 'post-Facility' humanitarian allocations.

It seems likely that there will be unspent surpluses even after the project extensions and reallocations due to COVID-19. Hypothetically, these funds could be (or could have been) provided by many partners to more vulnerable refugees as further cash transfers for protection outcomes, but this does not seem to have been requested by partners or proposed to them by the Commission. The evaluation team is unsure why this is the case, but hypothesises that the potential for further cash transfers could be limited by two factors: (i) the agreement that cash transfers would be standardised across all agencies and channels to TRY 1,000 (such standardisation is good practice in cash programmes, to reduce competition between agencies, to ensure fairness and transparency, and to ensure equity with national programmes in order to support social cohesion); and (ii) that the numbers of beneficiaries that can be directly reached by community centres is rather limited, because (as argued in the main protection report) community centres only ever reach a relatively small proportion of the refugee population, many of which already have access to ESSN.

A significant consequence of the conversion of unused surpluses to new cash programmes within the Commission's humanitarian portfolio, is that this had the effect of moving the Commission's partners beyond the narrow framework of case management and individual protection assistance (CM/IPA) (see

[476] CARE (May 2020), *COVID-19 impact assessment South-east Turkey* http://www.careevaluations.org/wp-content/uploads/Southeast-Turkey-COVID19-assessment-infographic.pdf

Protection Sector Report in Annexe II). With these COVID-19 cash supplements, refugees supported by protection partners were no longer limited to narrowly defined cash support for a specific protection outcome (IPA). Instead, they were able to receive general purpose cash (closer to a special needs fund – SNF), with broader eligibility criteria and more general protection benefits. It is possible that this (re)opening of the door to more of a SNF approach shift heralds the start of a gradual wind-up of the CM/IPA approach that was the Commission's hallmark during the Facility.

For a more detailed review of action-level adaptations in Protection see Volume III (Annex 1).

4.3. Impact of COVID-19 on Facility protection results

4.3.1. Summary of impact on outputs

While most projects had to curtail many of their planned activities, at least for four months and sometimes longer, most of them were able to convert to new COVID-19 programming. In this sense the projects were impacted, but were still able to achieve results – albeit sometimes different results.

The team's overall assessment of the protection partners is that the stronger the partner (the more secure their status in Turkey and their institutional sustainability) the better they were able to weather the shocks of COVID-19. In this perspective, UN agencies were the most resilient followed by the Turkish Red Crescent Society (TRCS). NNGOs (ASAM) were the most at risk, with INGOs somewhere in between.

4.3.2. Reflections on the overall impact for Facility protection objectives

The protection sector is made up of actors who are sensitive to risk, and protection partners are mostly UN agencies and NGOs, and therefore relatively agile. As a result of these underlying factors, protection activities have continued, albeit with some different delivery methods (i.e. online instead of face-to-face counselling). In the long run, it is the slow-down or shrinkage of government services (DGMM, MoFLSS/SSCs) that will probably have the most impact on protection, especially if these services do not resume at full scale after the COVID-19 period. This is more of a concern for SSCs than for DGMM, because DGMM's main client is the population of foreigners and migrants, whereas the SSCs are providing services first of all to the host population, whose needs have increased sharply as a result of COVID-19, and it remains to be seen how much bandwidth the SSCs will have for refugees in the future.

It is too soon to be confident in this assessment, but the evaluation team is cautiously optimistic that COVID-19 could have some positive effect as a disruptor in the hitherto lethargic relations between government and NGOs. It is possible that government will (i) see greater value in the work of NGOs as agile responders and able to fill gaps in-between government programmes, and (ii) that government will relax some of the restrictions on data collection and outreach – recognising the value of these activities in difficult times.

In general, the evaluation team concludes that COVID-19 has accentuated coverage and access gaps that were inherent in the system before COVID-19, and that as a result of COVID-19, groups of refugees who were already underserved or excluded will become further excluded and fall further behind.

5. Recommendations

This section presents the recommendations made by the evaluation team to the European Commission. These are the result of the evaluation findings, conclusions and a participatory process with EC staff to arrive at recommendations that are relevant and actionable. Recommendation 1 is also presented in the overarching strategic recommendations (Volume I) but is duplicated here due to its particular relevance to protection. Recommendations 2 and 3 are sectoral and relevant only to protection-specific interventions.

Recommendation	Links to conclusions and EQs	Time frame
Recommendation 1 (strategic): Strengthen the mainstreaming of protection across the Facility response (also Strategic recommendation 12 in Volume I)	Strategic Conclusion 7 (Volume I)	
Who: European Commission, in close cooperation with Turkey		
How:		
1.1 Develop and deliver a practical training programme, tailored to the Turkey context, to bring the understanding of protection by EU–Turkey field staff and partners to the same level. Maintain this understanding by ensuring that ongoing protection mainstreaming technical support is available to all EC staff in Turkey	EQs 2, 11	Immediate
1.2 Encourage Facility partners to undertake protection needs assessment and analysis to strengthen project implementation, using guidance that the EU already has available	EQs 2, 11	Immediate
1.3 Develop a methodology for assessing protection mainstreaming in each sector (i.e. indicators of inclusion and protection-sensitive response). Based upon this methodology, include a protection mainstreaming assessment in all future project-level monitoring of EU support to refugees in Turkey	EQs 2, 4, 11	Medium term
1.4 Encourage cross-fertilisation of ideas and knowledge between the EC services, for example encouraging humanitarian teams to share their understanding of protection, encouraging development teams to share their understanding of sustainability, conducting joint analysis, joint planning and joint field visits	EQs 2, 3, 6, 11	Immediate
Recommendation 2 (sectoral): Implement a more systematic approach to refugee awareness-raising and information	Protection sector report	
Who: European Commission, in close cooperation with Turkey		

Recommendation	Links to conclusions and EQs	Time frame
How:		
2.1 Advocate for the Protection Working Group to coordinate actors and service standards across the spectrum of refugee information and awareness-raising, so that all information providers work in a coordinated way to make accurate and relevant information available to refugees in the most effective and cost-efficient ways	EQ 11	Medium term
2.2 Encourage Facility partners (including government agencies) to leave no-one behind by making additional efforts to ensure that relevant information reaches underserved refugee and asylum seeker populations	EQ 11	Immediate
2.3 Allocate programming support across the awareness-raising and information portfolio so that there is a planned division of labour and appropriately scaled investment between (a) services telling refugees where to get information, (b) remote services meeting the basic information needs of most refugees, and (c) in-person services meeting the advanced information needs of refugees unable to solve their problems remotely	EQ 11	Medium term
Recommendation 3 (sectoral): Strengthen referral and case management services	Protection sector report	
Who: European Commission, in close cooperation with Turkey		
How:		
3.1 Propose that the Protection Working Group to undertake a service tracer study, aimed at assessing the extent to which refugees receive satisfactory services (all channels, all sectors) after referral	EQ 11	Immediate
3.2 Complete a review of how well the model of case management/individual protection assistance is working	EQ 11	Immediate
3.3 Using the evidence from the tracer study and the CM/IPA review, convene a workshop with partners to discuss the stakeholders' views on the optimal approaches to referral, and make adjustments as required	EQ 11	Medium term

6. Annex 1: Table of EU protection spending under the Facility Tranche I

Inputs		Activities		Sampled
Instrument	EU contribution to protection (EUR)	Action	IP	
ECHO	43,251,517	Providing protection and durable solutions to refugees and asylum seekers in Turkey	UNHCR	X
ECHO	33,100,000	Protection and improved access to services for refugees and asylum seekers in Turkey	UNHCR	X
EUTF Madad	32,399,356	Addressing vulnerabilities of refugees and host communities in five countries affected by the Syria Crisis	Danish Red Cross	X
EUTF Madad	10,000,000	Enhanced support to refugees affected by the Syrian and Iraqi crises in Turkey	ASAM	X
ECHO	9,157,929	Responding to protection needs of refugees in Turkey	IFRC	X
ECHO	8,000,000	Proactive Actions to reduce protection vulnerabilities among displaced populations in Turkey	DRC	X
ECHO	7,835,870	Improving access of most vulnerable refugees, particularly women, girls and key refugee groups to sexual reproductive health and better protection services including sexual and gender-based violence in Turkey	UNFPA	X
ECHO	7,000,000	Improving access of most vulnerable refugees to Social Services in Turkey	UNFPA	X
ECHO	4,410,000	Support to most vulnerable refugee women and girls to access sexual reproductive health and sexual and gender-based violence services	UNFPA	
ECHO	3,719,999	Urgent protection assistance for refugees in Turkey	CARE	X
ECHO	3,679,187	Aegean region and Turkey emergency refugee response programme	MC	
ECHO	3,192,000	Providing information and protection assistance to vulnerable refugees in Turkey, and linking them to protection services	WV	
ECHO	3,085,068	Humanitarian response to Syrian vulnerable refugees in southern Turkey	DRC	X
ECHO	2,876,773	Enhancing protection in the humanitarian response in Turkey through better addressing basic needs, supporting access to education and integrated service provision	IOM	
ECHO	2,700,982	Enhancing access to effective services and protection for people of concern in Turkey	DKH	
ECHO	2,700,000	PIPS – Providing Integrated Protection Services for the most vulnerable people in Mardin province	GAC (WHH)	
ECHO	2,287,737	Improving the health and protection of vulnerable Syrian and marginalised migrants in southern Turkey	GOAL	X

ECHO	1,775,386	Increased access to protection and basic needs support for vulnerable refugee children and families	UNICEF	
ECHO	1,758,531	Providing life improving protection support to vulnerable refugees and host families in Turkey	WV	
ECHO	1,503,600	Emergency protection and education support to refugees in Turkey	Concern	
ECHO	1,308,277	Turkey population movement	IFRC	
ECHO	1,260,758	Urgent basic humanitarian assistance, and coordination of information needs, for refugees in Turkey	CARE	X
ECHO	1,147,092	Improving the well-being of Syrian refugees through physical rehabilitation, protection mechanisms and primary health care services in southern Turkey	IMC	
ECHO	1,054,332	Emergency intervention for the most vulnerable Syrian crisis affected people in Turkey	HI	
ECHO	997,876	Proactive actions to prevent sexual and gender-based violence in south-east Turkey	DRC	X
ECHO	879,260	A multi-stakeholder and multi-sectoral response mechanism improves the access to inclusive and quality services for the most vulnerable Syrian and non-Syrian refugees including people with disabilities in west Turkey (Izmir and Istanbul city)	HI	
ECHO	693,891	Unconditional cash assistance and protection for out-of-camp Syrian and Iraqi refugees settled in south-eastern Turkey	DKH	
ECHO	680,071	Refugee protection response in Turkey	MC	
ECHO	357,120	Addressing the issue of food insecurity through cash card assistance in Turkey	GAC (WHH)	
ECHO	101,227	Provision of lifesaving health care and GBV protection to the most vulnerable refugees in southern Turkey	IMC	
ECHO	27,908	Provision of lifesaving health, physical rehabilitation, mental health, GBV and protection services in Turkey	IMC	
Total	**192,941,748**			