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# **Operational Guidelines on Complementary Pathways**

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# INTRODUCTION

**The UNHCR Operational Guidelines on Complementary Pathways (CPOG) is the first operational guidance that aims at supporting UNHCR colleagues in Headquarters, Bureaux and the field when designing and implementing complementary pathways activities globally.**

**This document is comprised of two parts**: 1) definitions, typology and main protection principles; 2) UNHCR's role.

**Part I of the Guidelines sets out the stage defining key elements in the space of complementary pathways.** It covers the scope, rationale and vision of the guidance and provides the legal foundation behind complementary pathways. It also introduces key concepts, definitions and the types of complementary pathways with their specific features. The first part also provides guidance on establishing eligibility for complementary pathways and gives suggestions of how this can be achieved. Protection considerations and key principles that need to be mainstreamed in complementary pathways programming and implementation to maximize protection outcomes are also featured in part I.

**Part II of the Guidelines focuses on UNHCR's engagement in complementary pathways.** It spells out four concrete pillars of such engagement: (1) data; (2) partnerships; (3) advocacy for changes in policy and legal frameworks; (4) policy development and capacity building. It provides useful tools for planning specific activities and ensuring protection considerations are upheld within complementary pathways design and implementation. Suggestions around specific roles of UNHCR personnel in diverse functions form a part of this section, along with considerations around ensuring integrity of the procedures, fundraising tips and communication lines.

The Guidelines also include **a set of annexes** that complement the content of the two parts and provide further support for the operationalization of the Guidelines.

As the world of complementary pathways is continuously changing, UNHCR's role is expected to evolve over time. Colleagues are encouraged to consult with this website for further updates and developments.

# EXECUTIVE SUMMARY

**Refugees globally face many challenges**, and are in need of international protection, which limits their access to education and meaningful employment, and often means they lack documents, face financial constraints and other barriers. However, **they bring forward incredible resilience and desire to succeed using their skills and capabilities.**

**Complementary pathways open up opportunities** for refugees to use their skills, background, experience and credentials; to build their futures through work, study and family reunification in countries other than their first country of asylum; to be selected based on their skills and aspirations; and to be able to build a future from the education or work opportunity they are qualified for in another country.

**To scale complementary pathways, it is important for existing migration systems to be adapted and take into consideration the need to protect refugees from refoulement**. Legal and policy amendments considered under the Guidelines aim to enable refugees to navigate those systems independently without having to give up their international protection needs, and to take up international opportunities to work, study or reunite with family.

**For this vision to become a reality, a multi-partner approach is essential.** Hosting and receiving States, the private sector, refugee-led and diaspora groups, the academia, employers, development actors and other key stakeholders all have a role to play in empowering more refugees to access international opportunities.

**UNHCR is part of this ecosystem of actors, helping bring them all together.** Our work around complementary pathways focuses on four pillars of engagement: understanding populations and collecting data; building coalitions and partnerships; advocating for law and policy changes; and developing policy and building capacity.

**These Operational Guidelines provide UNHCR personnel** in a diversity of relevant functions, such as protection, solutions, livelihoods, private sector partnerships, education, programme, development, **with a blueprint to start or expand their engagement in complementary pathways.**

**"**

Our vision is a world in which refugees can safely and independently navigate migration systems that take into account their specific protection needs, and where refugees are empowered to thrive and take up opportunities everywhere on an equal basis with others. This Guidance reaffirms UNHCR's commitment to making this vision a reality by working with partners towards expanding complementary pathways that factor in refugee protection needs.

**Ruvendrini Menikdiwela**
Assistant High Commissioner for Protection, UNHCR

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*John, Magaret and Nyuok at the Kakuma airstrip ahead of their departure to Türkiye on undergraduate and postgraduate scholarships. © UNHCR/Charity Nzomo*

Refugees should have the opportunity to access safe and regular migration options–just like anybody else. Making these opportunities more available and systemic is fundamentally what complementary pathways are about.

# 1.  PURPOSE

These Operational Guidelines outline UNHCR's operational approach in relation to complementary pathways for admission of refugees (hereafter used interchangeably with "persons in need of international protection"[1]) to third countries and provide an operational framework to inform UNHCR's engagement at field, country, regional and headquarters (HQ) levels. They build on existing policy documents relevant to complementary pathways, including the Global Compact on Refugees, the Global Compact for Safe, Orderly and Regular Migration, the UNHCR Strategic Directions 2022-2026, and the Third Country Solutions for Refugees: Roadmap 2030.

They should be read in conjunction with UNHCR's Operational Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

# 2.  SCOPE

These Guidelines are limited in scope to complementary pathways for persons in need of international protection. While family reunification is also part and parcel of complementary pathways, family life is a human right and the attainment of family unity is closely aligned to UNHCR's mandate. UNHCR's engagement in family reunification-related work is included in the current Guidelines as far as family reunification falls under the umbrella of complementary pathways. It is covered, though, in more detail in UNHCR's Operational Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

As the world of complementary pathways is constantly changing, UNHCR's roles in this ecosystem may also evolve over time. Therefore, colleagues are encouraged to regularly check this website for updates and developments.

These Guidelines are primarily aimed at UNHCR personnel working in protection, solutions, registration, education, livelihoods, information management and external engagement functions as well as others engaged in protection delivery. **This guidance is non-mandatory**.

# 3.  RATIONALE

Through the development of practical tools and guidance, this document seeks to standardize and harmonize UNHCR's practices and ways of working in countries of destination and departure. In doing so, UNHCR's global commitments to advancing the inclusion of refugees in the global market of opportunities are strengthened. This guidance is designed to clarify UNHCR's roles and responsibilities in complementary pathways.

**Complementary pathways are a vital part of UNHCR's protection work and strategy.** UNHCR may play a more significant role during the initial stages of building systems that link up various service

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**1**    A person is in need of international protection when they are outside their own country and unable to return home because they would be at risk there, and their country is unable or unwilling to protect them. The term is not a legal term of art and is used to encompass in addition to refugees, beneficiaries of complementary forms of protection and stay arrangements, and people otherwise in need of international protection. They are similarly situated to refugees and often have equally serious international protection needs, which warrant extending them the same protections, rights and access to solutions as refugees. Any difference in treatment must be objectively and reasonably justifiable so as not to be discriminatory. See UNHCR, Persons in need of international protection, June 2017, www.refworld.org/policy/legalguidance/unhcr/2017/en/121440.

providers, governments, private sector and many other actors that have a role in ensuring the smooth functioning of pathways for refugees. The long-term vision of equal access to migration pathways for refugees relies on partners—with UNHCR maintaining a monitoring, advisory and coordinating role, streamlined under the existing resource framework.

# 4. UNHCR'S VISION

**UNHCR's long-term vision** is a world in which refugees can make informed choices about their migration options and enjoy the freedom of movement to do so. In this world, refugees, have access to documentation and rights, and can independently navigate migration frameworks which can maintain their own purposes while being adjustable to the specific needs of refugees.

**To get there,** UNHCR advocates that the laws and policies governing migration are adapted to be more inclusive of refugees in order to permit their full, unhindered and independent access. UNHCR supports initial project work, driven by the need to diagnose hurdles, formulate solutions and develop partnerships.

**The short-term vision** involves supporting the growth of partnership networks and systems to broaden access to opportunities by creating linkages between departure and destination countries with appropriate regulatory systems, while advocating for the removal of obstacles over time. As the necessary partnerships are being put into place, UNHCR plays a coordinating and capacity-building role focusing on ensuring protection, mobilizing support, acting as a bridge between partners, and promoting the inclusion of refugees in a globalized world.

# 5. LEGAL FOUNDATION

As a subsidiary organ of the United Nations General Assembly, UNHCR is entrusted with the mandate to provide international protection and, together with governments, seek permanent solutions for refugees,[2] which complementary pathways can contribute or lead to. The Statute confers responsibility on UNHCR to promote the admission of refugees to the territories of States, promote accession to and supervise the application of international conventions for the protection of refugees,[3] including but not limited to the 1951 Convention relating to the Status of Refugees and its 1967 Protocol[4] ("the 1951 Convention"). The 1951 Convention sets out the rights of refugees and obliges State parties to cooperate with UNHCR in the exercise of its mandate and provide the organization with information and statistical data.[5]

The legal basis for States facilitating refugees' access to complementary pathways is rooted in several provisions of the 1951 Convention and regional refugee law instruments.
Notably these include:

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**2** UN General Assembly, Statute of the Office of the United Nations High Commissioner for Refugees (the Statute), 14 December 1950, A/RES/428(V), para. 1, www.refworld.org/docid/3ae6b3628.html. Refugees are broadly understood to include all persons outside their countries of origin who are in need of international protection because of a serious threat to their life, physical integrity or freedom in their country of origin as a result of persecution, armed conflict, violence or serious public disorder. See UNHCR, Persons in need of international protection, June 2017, fn. 6, https://www.refworld.org/policy/legalguidance/unhcr/2017/en/121440.

**3** Ibid, para. 8(a) and 8(d). In addition, para. 9 of the Statute is relevant in that it directs UNHCR to engage in activities aimed at finding solutions for refugees as the UNGA may determine.

**4** UN General Assembly, Convention Relating to the Status of Refugees, 28 July 1951, United Nations Treaty Series, No. 2545, vol. 189 www.unhcr.org/refworld/docid/3be01b964.html. UN General Assembly, Protocol Relating to the Status of Refugees, United Nations, Treaty Series, vol. 606, p. 267, 31 January 1967, www.refworld.org/legal/agreements/unga/1967/en/41400.

**5** Ibid., Article 35 and Article II of the 1967 Protocol.

- **Article 28 of the 1951 Convention and Article 6 of the 1969 OAU Convention Governing the Specific Aspects of Refugee Problems in Africa (OAU Convention)** requiring States to issue travel documents to refugees lawfully staying in their territory and recognize/accept such documents;
- **Article 27 of the 1951 Convention** requiring States to issue identity documents to any refugee in their territory, which is essential to fulfil the administrative requirements of complementary pathways;
- **Article 25 of the 1951 Convention** requiring State parties to provide administrative assistance where the exercise of a right would normally require the assistance of authorities of a country that an individual cannot contact due to international protection concerns. Such assistance may include delivering documentation as well as providing and recognizing documents in lieu of the original document issued by the authorities of the country of origin.
- **Articles 17, 18, 19 and 24 of the 1951 Convention** providing for the right to decent work. Accessing (self-)employment opportunities and social security services is crucial for persons in need of international protection to build their skills. Similarly, accessing public education including by the recognition of certificates, diplomas and degrees, as provided for under **Article 22**, is essential for qualifying for education or employment pathways.
- **Article 26 of the 1951 Convention** providing refugees lawfully the right to choose their place of residence in the territory of a State party with freedom of movement within the territory. This is important for individuals to be able to access education and employment opportunities to enhance their skills and qualifications and to access the administrative and financial services in order to fulfil complementary pathways requirements.
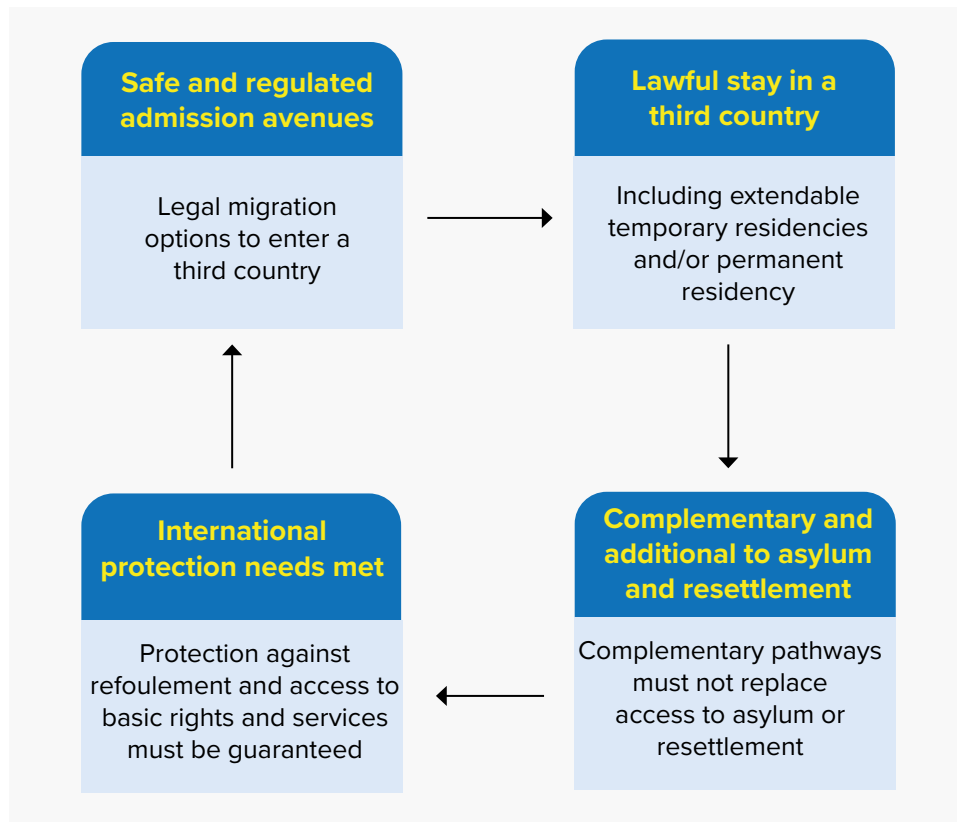
Other rights provided for in the 1951 Convention, regional refugee law instruments and human rights law may also facilitate access to complementary pathways, paving the way for refugees to find a durable solution. Importantly, persons in need of international protection who move through complementary pathways to another country enjoy all rights and duties provided for under the 1951 Convention, regional refugee law instruments and human rights law in the country of destination.

In the Third Country Solutions for Refugees: Roadmap 2030 ("Roadmap 2030") the global community set a target of at least 2.1 million refugees successfully accessing complementary pathways by 2030. This follows from the Global Compact on Refugees (GCR) which emphasizes the need to make pathways available to refugees on a more systematic basis. UNHCR's Strategic Directions 2022-2026 also affirm the need to expand, pursue and adapt complementary pathways.

The UNHCR Executive Committee Conclusion No. 117 on Durable Solutions and Complementary Pathways adopted in 2024 is the first conclusion to comprehensively address complementary pathways, and highlight their essential role as a facilitator of solutions. It reaffirms key principles of international refugee law and human rights, and can support UNHCR advocacy on these issues. Despite their non-binding nature, ExCom Conclusions are widely recognized as a source of "soft law" that can inform the implementation of legal obligations. This ExCom Conclusion contains a number of important and positive affirmations by States and can be referred to as clear evidence of political will at the international level by States to promote access to solutions to displacement.

# 6.    DEFINITIONS

**COMPLEMENTARY PATHWAYS** | Migration pathways with refugee-specific flexibilities built in that allow refugees and others in need of international protection to access work, study and other opportunities outside of their country of asylum, while their international protection needs are respected. Complementary pathways can also take the shape of programmes created specifically for refugees and others in need of international protection to access opportunities internationally outside of UNHCR-assisted resettlement.

| **Safe and regulated admission avenues** | **Lawful stay in a third country** |
|---|---|
| Legal migration options to enter a third country | Including extendable temporary residencies and/or permanent residency |

| **International protection needs met** | **Complementary and additional to asylum and resettlement** |
|---|---|
| Protection against refoulement and access to basic rights and services must be guaranteed | Complementary pathways must not replace access to asylum or resettlement |

| **Figure 1:** Key attributes of complementary pathways

Complementary pathways fall broadly into four categories (see Annex 1 for key differences between complementary pathways):

- **rights-/dependency-based** (travel for family reunification of immediate or extended family members based on a right to family life and the principle of family unity);
- **qualifications-/skills-based** (travel for work or study, or for sport and the arts, academic research, and other pursuits);
- **needs-based** (including evacuations from high-risk areas; short stay arrangements during natural disasters, etc.); and
- **sponsorship-based** (when extended family members, communities and others in destination countries identify and support visa applications and then offer settlement support).

**PERSON IN NEED OF INTERNATIONAL PROTECTION** | Used to encompass in addition to refugees, beneficiaries of complementary forms of protection, temporary protection and stay arrangements, as well as people otherwise in need of international protection. They are similarly situated to refugees and often have equally serious international protection needs, which warrant extending them the same protections, rights and access to solutions as refugees. Any difference in treatment must be objectively and reasonably justifiable so as not to be discriminatory. UNHCR in its

2017 Guidance on the topic outlines that "the need for international protection arises when a person is outside their own country and unable to return home because they would be at risk there, and their country is unable or unwilling to protect them". This definition follows closely the definition under Article 1(A) of the 1951 Convention as well as the expanded definitions considered under regional refugee instruments.[6]

**REFUGEE TRAVEL DOCUMENTS** | Identity and travel documents issued to refugees for the purposes of international travel. These documents should be machine readable and issued in conformity with regulations stipulated by the International Civil Aviation Organization (ICAO). They should provide protection from return to the holders' country of origin (non-refoulement), be renewable at the diplomatic representations of issuing countries abroad, carry an extended validity period of five years or more, and allow ideally for the right to return to the issuing country. The 1951 Convention Travel Document (CTD) is the most known type of refugee travel document issued in accordance with Article 28 of the 1951 Convention or Article 6 of the OAU Convention to refugees by the State where they are legally staying.

Refugee travel documents may also take other forms.[7] These forms may include foreigner passports with special provisions; regional travel documents valid for cross-border movements within economic communities; one-way laissez-passers issued by destination States (particularly for family reunification or humanitarian pathways where permanent status and identification documentation are available upon arrival); boarding foils, etc.

As per the UNHCR Executive Committee Conclusion No. 114 on Machine-Readable Travel Documents for Refugees and Stateless Persons (2017),[8] States party to the 1951 Convention and the OAU Convention are under an obligation to issue a travel document to refugees lawfully staying in the country and to mutually recognize travel documents issued by other State parties. They are also encouraged to issue travel documents to other refugees in their territory with particular consideration for refugees who are unable to obtain travel documents from their country of lawful residence.
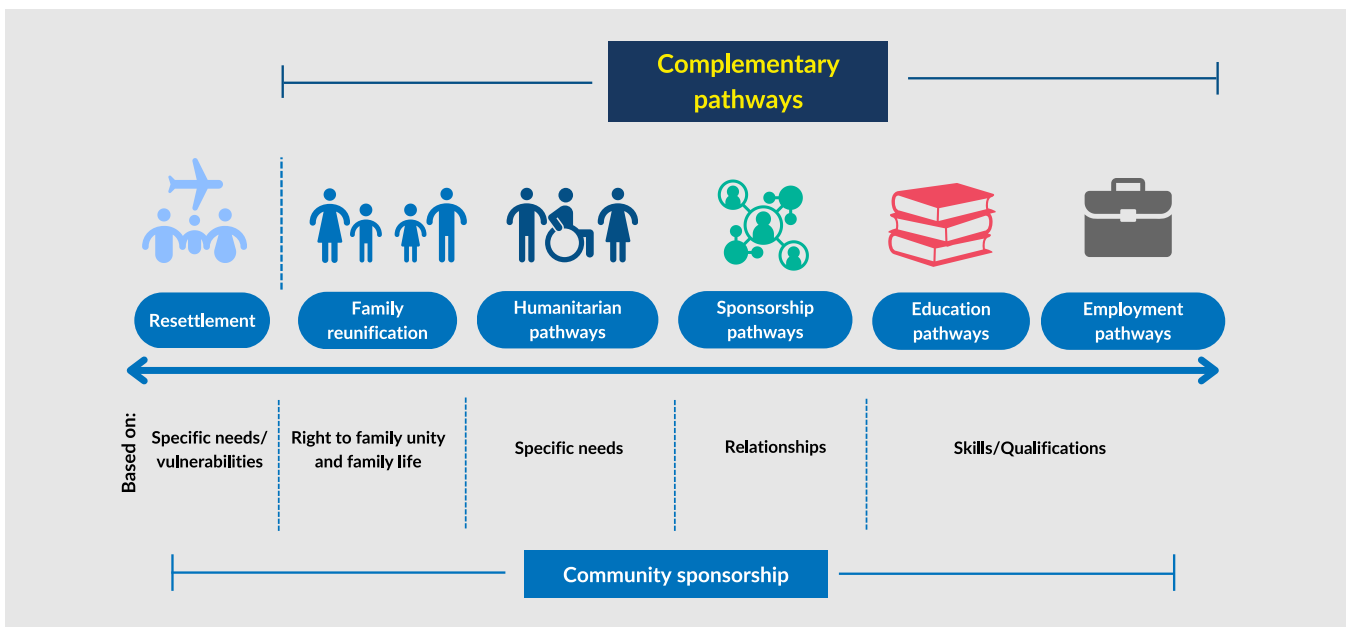


| **Figure 2:** The spectrum of third-country solutions

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**6**    See the 1969 OAU Convention, the 1984 Cartagena Declaration, the EU Qualification Directive and other relevant instruments of the EU asylum acquis Communautaire, and the 1966 Bangkok Principles.

**7**    DIP has commissioned a study on the alternatives to CTDs for the purposes of international movement. The reference to the outcomes of the research and a relevant toolkit will be forthcoming.

**8**    Other relevant ExCom Conclusions of importance include No 13 (1978), Conclusion No 18 (XXXI) 1980, para (i), and Conclusion No 49 (XXXVIII) 1987, as well as Conclusion No 112 (LXVII) 2016 on international cooperation from a protection and solutions perspective.

# 7. COMPLEMENTARY PATHWAYS TYPOLOGY

## 7.1 Humanitarian pathways

**Programmes which offer a pathway for admission to individuals in need of international protection through their identification and transfer from the first country of asylum to a third country where they can enjoy effective protection. Eligibility criteria for such programmes are decided by States, sometimes jointly with other actors in the receiving country, and are discretionary.**

Humanitarian pathways are flexible, effective protection tools that can lead to durable solutions for refugees. They can be used in the early stages of emergencies as a solution for particularly vulnerable groups and as a complementary tool to other pathways such as to facilitate extended family reunification. It is important that humanitarian pathways carry the maximum protection impact possible and are designed to complement and not replace other methods of securing international protection, including access to asylum procedures, resettlement or commitments to secure durable solutions by other methods.

**Eligibility is determined by each destination State** but may be based on humanitarian/protection needs and vulnerability criteria in the country of asylum, or family links and other connections to the country/community of destination. Beneficiaries of these programmes may therefore be selected against broader eligibility criteria than those applicable to resettlement which may include general humanitarian needs or existing links to the receiving country.

**Humanitarian pathways often follow an expedited process used to respond to situations of large-scale displacement.** Admission under these programmes is often granted on a temporary basis and can be extended through an application for asylum upon arrival. Ideally, they render refugees eligible for permanent residency and nationality under the same provisions as holders of other visas.

In some situations, humanitarian pathways are used for persons in urgent need but without verified international protection needs. Such programmes can include migrants in vulnerable situations, extended family members or persons in need of medical assistance and care. Some programmes are only open to specific nationalities and countries of asylum, populations fleeing specific conflicts, people with certain identities or convictions, or individuals with family links in receiving countries.

Humanitarian admission programmes tend to vary between countries. Examples of such programmes include the US Humanitarian Parole programmes for specific nationalities and the Humanitarian Corridor Programmes in Italy.

**Humanitarian visas** may be used as a tool to facilitate admissions for humanitarian pathways or other complementary pathways programmes, including employment or education opportunities and family reunification. UNHCR's roles in humanitarian pathways are featured in Annex 2.

## 7.2 Qualifications-/skills-based pathways (education and employment)

**Legal channels that permit persons in need of international protection to move to a safe third country for the purposes of employment or higher education, while also having their protection needs met. Refugee eligibility for skills-based pathways is assessed based on professional**

**qualifications and experience, or academic merit and relevant qualifications, provided refugees opt to apply for the opportunities at hand.**

The success of individual applicants depends largely on the cross-sector collaboration which supports refugees in leveraging their skills and experience, facilitates their inclusion in national education and labour systems and improves their access to training and support in preparation for complementary pathways. Considering complementary pathways opportunities when planning economic inclusion activities and advocacy lines would further support refugees in attaining such opportunities independently. To this end, UNHCR serves as an advocate and a bridge between partners and refugees, and advocates for policy change or adaptation.

### EDUCATION PATHWAYS

Access to third-country education opportunities corresponds to UNHCR's objectives set out by both Roadmap 2030 and the Education 2030 Strategy. A diverse range of actors is needed to contribute distinct areas of expertise to make education pathways effective and scalable. This can include universities, non-governmental organizations (NGOs), refugee-led and student-led organizations, civil society and faith-based organizations, refugee settlement and support services, local communities, language training providers, credentialling and testing services, country of asylum and third-country governments, and Technical and Vocational Education and Training (TVET) institutions. The Global Task Force on Third Country Education Pathways is the first port of call for information on coordination, best practices and technical support in developing and implementing education pathways.

This 2023 Global Refugee Forum pledging document provides more information on UNHCR's key advocacy points around education pathways. UNHCR's roles in education pathways are featured in Annex 3.

### EMPLOYMENT PATHWAYS/LABOUR MOBILITY

Like other complementary pathways, employment pathways aim to promote refugee agency and self-reliance. In many countries around the world, refugee talent can help to address labour market shortages. Essential to this process is securing the support of employers who are keen to recruit and employ appropriately skilled refugees. Ensuring that political support is strengthened and governments are adequately supported to launch and implement employment pathways remains a priority. UNHCR is a member of the Global Task Force on Refugee Labour Mobility, which works to expand labour mobility pathways globally by engaging private sector, States and non-State actors engaged in global migration and works closely with the members of other fora to ensure that opportunities are nurtured.

This 2023 Global Refugee Forum pledging document provides more information on UNHCR's key advocacy points around employment pathways. UNHCR's roles in employment pathways are featured in Annex 3.

## 7.3   Family reunification

**The legal, rights-based and State-provided avenues that allow refugees to access their right to family life regulated by national, regional and international law. Family reunification procedures include individuals with close and extended family relations based on the concept of dependency which ensures that family members—who may not be close family members but are nevertheless dependants—are able to enjoy the right to family life and family unity.**

Family life is a human right. Respect for the right to family life and the principle of family unity requires States to refrain from conduct which would result in family separation, but also to take measures to maintain family unity and ensure the reunification of separated families.

**The reunification of refugee families is first and foremost the responsibility of States**. A part of UNHCR's job is to support States meet their obligations under international law and uphold the principle of family unity. Even though States are the central figure in family reunification procedures, refugees navigating these systems often need the support of multiple actors in sending and receiving countries. While States often have adapted legislative frameworks to facilitate family reunification of refugees, in many cases these frameworks suffer from multiple shortcomings. When seeking to reunite, refugee families are subjected to migration system requirements such as requests for passports, documentary evidence of relationships, in-person interviews in foreign States, which do not take into consideration their international protection needs.

For extensive guidance on UNHCR's roles in family reunification, consult UNHCR's Operational Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

## 7.4  Sponsorship pathways

**Programmes in which private individuals, entities or organizations (nomination sponsors) directly engage in admission efforts by identifying, selecting and supporting the entry and stay of nominated individuals in need of international protection. Sponsorship can often include the provision of financial, emotional, social and/or settlement support in a third country (an integration tool which UNHCR refers to as "community sponsorship").**

**UNHCR's main role in sponsorship pathways is to advocate for protection safeguards, transparent selection processes, effective monitoring systems and complementarity to resettlement quotas**. On the departure country's side, **UNHCR also negotiates with States to ensure smooth departure**, including through issuance of travel documentation and exit permits.

Sponsors are the ones identifying, selecting and supporting the entry and stay of persons in need of international protection. State authorities manage the visa process and work with sponsors to ensure the well-being of refugees and that their post-arrival needs are met. Even though sponsors lead the process, it is States that retain the ultimate responsibility over the admission decisions. States are also responsible for the protection of refugees, including by ensuring that they have access to rights and services upon arrival and that their sponsors are vetted and trained in line with pre-established criteria.

Sponsorship programmes present important opportunities to increase access to third-country solutions by leveraging public support for refugees. They engage a broad range of actors across communities and are an important tool for family reunification; while sponsors can choose whom to support, sponsored individuals often include close and/or extended family members of the sponsors (or people known to the community). UNHCR's specific roles in sponsorship pathways are featured in Annex 4.

**What is the difference between sponsorship pathways and community sponsorship?**

**Community Sponsorship:** Community sponsorship is a reception and integration tool that involves the pairing of resettled refugees or persons admitted under complementary pathways with individuals, groups of individuals or organizations (i.e. sponsors such as local clubs, businesses, university communities, faith groups, etc.). These entities commit to providing clearly defined financial and/or in-kind contributions, emotional support and volunteer services to help refugees or other persons in need of international protection upon arrival.

**Sponsorship Pathways (private sponsorship or naming programmes):** Sponsorship pathways (sometimes referred to as "private" or "named sponsorship") are a third-country solution that should

lead to an overall net increase in the number of persons in need of international protection admitted to receiving countries. Scenarios where communities have greater involvement, for example, in identifying beneficiaries and/or facilitating admission are sponsorship pathways. Such pathways, are likely to be accompanied by the expectation that sponsors will take on settlement support upon arrival.

Information is also available through the Global Refugee Sponsorship Initiative (GRSI).



*Yohannes, an Ethiopian refugee evacuated from Sudan, is reunited with his mother and welcomed by his step-grandmother at Brussels airport, Belgium.*
*© UNHCR/ Olivier van Naemen*

# 8. WHO CAN ACCESS COMPLEMENTARY PATHWAYS?

It is important to recall that any person in need of international protection should be protected from refoulement at any moment in time. In the context of complementary pathways this means that those travelling on such opportunities cannot be asked to give up their protection status at any point and must remain protected from refoulement throughout their pathways journey.

To qualify for various types of complementary pathways, refugees need to show **skills, experience, language capacity or have family members in other countries**. They also are often required by States and other partners to provide proof of their international protection needs, relied upon by these parties to justify applying concessions for refugee inclusion in pathways programmes. Documents confirming an individual's recognition as a refugee by a national asylum authority or UNHCR could serve as a proof of eligibility for complementary pathways concessions. This can include documents such as a **UNHCR-/State-issued card or certificate that indicates refugee status, or a documentation or card issued by a State indicating complementary or temporary protection status**.

While many refugees hold such refugee documentation, there are many individuals with international protection needs who may not have access to asylum procedures or may not be able to have their international protection needs recognized in a timely manner. This particularly applies to those residing in States without an asylum framework or asylum procedures, or in States with asylum procedures facing processing delays. Additionally, persons in need of international protection may not need to rely on the asylum procedures in place as they are allowed legal stay through other types of statuses that are available and more accessible to them (e.g. temporary protection or other regularization procedures/migration status).

Given this consideration, **UNHCR advocates for a broader approach to eligibility confirmation for complementary pathways that is not exclusively linked to refugee status determination. Alternatives may include asylum-seeker documentation or proof of registration for asylum** with a national asylum authority or UNHCR for nationalities with high recognition rates, as per UNHCR country guidance (e.g. international protection considerations or guidance notes) or as per recognition rates in the receiving State, region or globally.

If none of the above options are feasible in a particular context, modalities could be explored whereby the receiving State confirms eligibility for refugee status according to their refugee legislation.

**In contexts where there is no fair and efficient national asylum system in place, UNHCR may conduct refugee status determination (RSD) under its mandate where it is the most effective intervention to promote protection and solutions.** Such RSD is at times required by programme providers for the purposes of eligibility (e.g. Canadian sponsorship through the Group of Five programme).

**The use of mandate RSD should only apply after an analysis of whether it is the most appropriate protection intervention**, in consultation with the Regional Bureaux and the Division of International Protection. This analysis can take into account the following considerations:

- the operational context;
- the likelihood that the complementary pathway departure will materialize in the short to medium term;
- the scale of the mandate RSD that would have to be conducted; and
- the availability of other complementary pathways that could provide quicker solutions to refugees

(e.g. through work, study or family opportunities ) where RSD would not be necessary.

**When considering whether to embark upon large-scale mandate RSD, the following considerations can be taken into account:**

- the length of the procedure before departure on the complementary pathways programme requiring RSD;
- the population readiness to compete for other opportunities, including work or study pathways;
- the population needs in accessing family reunification;
- the availability and feasibility of humanitarian admission programmes either in place or potentially available;
- the availability of infrastructure to support individual refugees accessing various complementary pathways and identified needs to enhance the support structure;
- the potential dividends of having a support structure in place in the long-term that could assist refugees accessing complementary pathways options.



*Jordan. Ziad, a Syrian refugee, seeking carpentry job in a third country through UNHCR partner. © UNHCR/ Nisrine Benyahia*

# 9.  PROTECTION CONSIDERATIONS AND KEY PRINCIPLES

Mainstreaming the principles below, listed in no particular order of importance, will allow to maximize the protection impact of complementary pathways.

## AGENCY AND SELF-RELIANCE

Complementary pathways serve the objective of enhancing refugee self-reliance and helping refugees attain a durable solution in the future. This is particularly the case for education and employment opportunities that can also be beneficial for third countries by helping to address labour or skills shortages and build public support for refugees by demonstrating their positive contributions to receiving societies. While these pathways may initially provide refugees with temporary stay arrangements, they could be part of a progressive approach to solutions. By harnessing refugees' capacities and providing them with opportunities to learn new skills, acquire more knowledge and showcase their talents, these pathways make refugees better able to contribute to their own future solutions. The work around complementary pathways, therefore, focuses on establishing systems and mechanisms that are sufficiently flexible and accessible so that **persons in need of international protection can use them independently and without intermediaries**. That, in turn, may enable them to make decisions and utilize their skills and knowledge to shape their future.

## PROTECTION AGAINST REFOULEMENT

Systems and procedures need to be put in place by the destination and departure States to guarantee protection from refoulement for refugees accessing complementary pathways.

Clear ways of preserving this protection are:

a) **Access to multi-trip machine readable refugee travel documents—and the ability to renew them at the embassies of issuing countries:** Refugees participating in work, education or other temporary opportunities should, in principle, have the right to re-enter the first country of asylum where they are protected from refoulement and enjoy the same rights and status that they had prior to departure; and

b) **Meaningful access to asylum in receiving countries without time limits:** When refugees are unable to return to their first country of asylum and have not managed to secure their stay through legal means in their complementary pathways country, they need to be able to seek asylum that protects them from refoulement and allows them to remain in the third country as long as they are in need of international protection.

> Refugees must not be required to return to or contact their country of origin as part of a process to access complementary pathways, extend their stay in a third country or for any other reasons.

## PROGRESSIVE APPROACH TO SOLUTIONS

A solution is achieved when a durable legal status is obtained which ensures national protection for civil, cultural, economic, political and social rights. **While solutions-oriented, complementary pathways do not always lead refugees directly to a solution**. They also may vary by country, eligibility, processes, duration, access to residency and solution outcomes. In some cases, a refugee

may choose to relocate for study to one country and then move to a different one for another opportunity through a legal pathway with a temporary legal status (work or study permit) before becoming eligible for permanent residency and eventually citizenship— thus allowing them to cease their refugee status. In others, the work, study and even family reunification or sponsorship opportunity may allow the refugee and their family to continue with their lives in relative peace while awaiting return to their home country and the chance to contribute to the rebuilding effort using the skills and savings gained while in exile. Refugees who arrive in third countries on legal pathways with a temporary legal status linked to employment or education often must navigate steps towards permanent residence and naturalization to extend their stay. This, for example, may mean that refugees are able to acquire a temporary work-related residence upon completion of a study course and subsequently access permanent residence following the required length of stay, on the same basis as other individuals migrating to other countries for such opportunities.

## ADDITIONALITY TO ASYLUM AND RESETTLEMENT

Complementary pathways should not substitute the protection afforded to refugees under the international protection regime in terms of access to international protection through asylum procedures, and they should not serve to diminish resettlement programmes. **The right to seek asylum is a fundamental human right for which complementary pathways cannot substitute.** By definition, complementary pathways are accessible on the basis of skills and experience, family and community links and other factors. In contrast, resettlement offers a solution in another country to those with acute protection needs that cannot be addressed in their countries of asylum. **Complementary pathways should lead to an overall net increase in the number of people accessing third-country solutions** without jeopardizing or replacing resettlement quotas that offer solutions based on specific protection needs.

## FAMILY UNITY

**Preserving family unity should be at the core of the design for all complementary pathways,** ideally by ensuring that family members can travel together or are able to reunite without delays through family reunification procedures with refugee-specific concessions built into them. This applies to situations of longer-term relocation or permanent settlement through complementary pathways. Access to fast and effective refugee-specific family reunification is one of the flexibilities that could be considered when designing complementary pathways to prevent family separation over extended periods of time. For shorter-term opportunities, the same rules that apply to work/student migrants should apply to refugees travelling on such opportunities.

## NON-DISCRIMINATION

**Complementary pathways are based on the premise that refugees should have equal access to the opportunities offered by regular migration**, without discrimination on the basis of their status as refugees. It is equally important that complementary pathways are non-discriminatory and accessible without distinction of any kind such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Pathways should be based on objective criteria, taking into consideration the specific situation of the refugees concerned, such as gaps in education or work experience, lack of available certification of skills and previous qualifications, and/or medical or psychological needs as well as the overall protection context in the country of asylum. **Ensuring equal access and opportunities for all refugees should inform the expansion of complementary pathways**. For example, barriers may obstruct access to complementary pathways for women, people of diverse sexual orientation, gender identity, gender expression and/or sex characteristics (SOGIESC), ethnic and religious minorities, gender-based-violence survivors, people living with disabilities and other potentially marginalized groups. All complementary pathways should prioritize equity and

protection. In programme design, this can mean introducing specific quotas for women and others; adjusting eligibility criteria to promote greater parity among successful candidates; and working at community level to challenge gender norms and obstacles relevant to specific individuals and groups.

## PROTECTION FROM EXPLOITATION, AND ACCESS TO RIGHTS, SERVICES AND JUSTICE

Countries of destination are obliged to provide **minimum standards of treatment for refugees**. These minimum standards draw from key international conventions and cover a range of categories including access to protection, personal status and legal documentation, education, work rights, social security and public relief, health, housing, freedom of movement, religion and access to the courts. Refugees travelling on complementary pathways also require access to justice, including fair hiring and employment practices, occupational health and safety, freedom from discrimination, exploitations or other risks associated with third-country mobility, irrespective of their legal status. In this regard, the International Labour Organization (ILO)'s Guiding principles on the access of refugees and other forcibly displaced persons to the labour market and the UNHCR Guidelines on International Legal Standards Relating to Decent work for Refugees are key references. Essential services such as health, insurance, education, legal aid/assistance, housing, financial services, counselling and psychosocial services, and language support are also important. Providing initial targeted support upon arrival in the third country and adequate social and legal support until a longer-term option or durable solution is found needs to be considered.

## BEST INTERESTS OF THE CHILD

Complementary pathways must be child-sensitive and incorporate appropriate child-focused protection safeguards. They should be grounded on the principle of the **best interests of the child** and on the protection and fulfilment of the rights of the child.[9]

## PROTECTING PERSONAL DATA

At each stage of the process and especially when handling sensitive information, UNHCR, governments and other actors need to understand their **legal obligations (as data controllers) vis-à-vis individual data subjects** and be aware of potential risks. This includes obtaining consent and informing individuals, knowing how data should be safely stored and transferred, how long it needs to be retained and when personal information should be deleted, and having in place organizational and technical measures of data and information security (e.g. encryption). Such a "privacy by design and by default" approach ensures that data is processed safely and contributes to successful programming. All personal data processing by UNHCR needs to comply with applicable data protection rules, mainly UNHCR's General Policy on Personal Data Protection and Privacy (GDPP) and implementing instruments. Data-sharing agreements between departure and destination States and, where applicable, UNHCR should be set in place when UNHCR is requested to share individual data, owned by the country of first asylum (in situations of government registration and asylum procedures for status issuance).

## INCLUSION OF REFUGEES' PERSPECTIVES IN DESIGN, MONITORING AND EVALUATION OF PROGRAMMES

The integration of refugees' perspectives in the design and implementation of complementary

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**9**     UNHCR, 2021 UNHCR Best Interests Procedure Guidelines: Assessing and Determining the Best Interests of the Child, May 2021, www.refworld.org/policy/opguidance/unhcr/2021/en/122648.

pathways is key to ensuring that their specific situation is taken into account. Regular feedback mechanisms and consultations with refugees on the barriers that may prevent uptake and on the ways to improve structures can ensure that pathways are appropriate, safe, scalable and accessible for refugees.

## Complementary pathways and the Route-Based Approach

UNHCR's shift towards an operational Route-Based Approach (RBA) that plans around and responds to the entirety of a refugee's journey focuses on reception, asylum systems, inclusion, development action, return and complementary pathways.

There is wide recognition that work opportunities and family unity imperatives drive much irregular movement—including onward movement from countries of first asylum. Greater access to complementary pathways and family reunification may serve to mitigate irregular and unsafe movement, thus helping refugees to avoid traffickers and other risks along the route.

As such, supporting and lifting obstacles to the use of complementary pathways at the origins of and along mixed migration routes is one of UNHCR's key protection priorities.

Ensuring protection and respect for rights of migrants and refugees along key routes

| Protection sensitive entry and admission | Strengthening asylum systems for refugees and rights-focused migration management | Addressing immediate protection & assistance needs and comprehensively addressing trafficking and smuggling | Protection and rights centered options in countries (inclusion & development) | Safe, legal and complementary pathways | Safe and dignified return, readmission and reintegration of migrants and voluntary repatriation of refugees |

| *Figure 3:* Pillars of UNHCR's Route-Based approach

# 10. UNHCR'S ROLE AND ENGAGEMENT IN COMPLEMENTARY PATHWAYS



**UNHCR'S ENGAGEMENT IN COMPLEMENTARY PATHWAYS**

- Understanding populations and collecting data
- Building partnerships and coalitions
- Advocating for law and policy changes
- Developing policy and building capacity

| **Figure 4:** Pillars of  UNHCR's engagement in complementary pathways

As explained in chapter 4, UNHCR's long-term vision is a world in which persons in need of international protection can make informed choices about their migration options, enjoy freedom of movement and are able to navigate migration frameworks that are cognizant of refugee-specific limitations (with relevant support services available, if needed). These longer-term goals are focused on amending migration systems and frameworks to allow for refugee inclusion through linking development, training, certification, entry rules and systems, support frameworks and integration structures together.

UNHCR's role in this space lies in **ensuring that persons in need of international protection are included in national and international systems, their international protection and other needs are taken into account, and the institutions that serve them both understand those needs and are equipped to address them in the context of cross-border legal pathways.**

As an advocate for refugee inclusion and as per its Global Livelihoods and Economic Inclusion Strategy (forthcoming), UNHCR plays a pivotal role in **providing policy and legal analysis of refugees' access to opportunities, facilitating the collection of socio-economic data** to **enrich demographic profiles and utilizing evidence-based information to advocate for inclusive solutions**. In contexts where livelihood and economic inclusion interventions are already under way, a facilitation and advocacy role—avoiding the creation of parallel systems—may be most suitable for UNHCR.

**In some operational contexts,** local service providers, including but not limited to civil society organizations, NGOs, refugee-led organizations, do not have the resources (e.g. skills, knowledge, training, funding, staffing) to work on complementary pathways. **UNHCR may step in to fill the gaps** and, consequently, play a temporary capacity-building role, support with fundraising efforts, strategy building and link local initiatives with existing development and migration initiatives and with international partners involved in sourcing refugees for specific pathways opportunities.

**UNHCR's engagement in complementary pathways organizes around the following four pillars. When deciding the exact type of engagement, UNHCR Operations should consider an analysis of the local protection and solutions context, the availability of partnerships and access to development initiatives, among other things.**

## PILLAR I: UNDERSTANDING POPULATIONS AND COLLECTING DATA

More systematic data collection is essential to building complementary pathways for refugees. Collecting pathways-related data allows project partners to plan and design pathways and interventions, assess the protection impacts of complementary pathways programmes, extract lessons learned and ensure evidence-based programming in the future for more effective outcomes. Data and evidence are also essential in monitoring progress against UNHCR's commitments under the GCR and the objectives set in Roadmap 2030.

### A)     Know the population and build profiling data

Collecting information about the refugee population is an essential first step in planning for pathways at both the departure and destination sides. In the first countries of asylum capturing up-to-date individual information (including education and work experience, family links in third countries, languages spoken, specific needs and other data points relevant to complementary pathways) through the self-service tools of UNHCR and partners and through proGres enables UNHCR Operations to assess the viability of different pathways in their context and plan accordingly. Such data-collection efforts could be embedded within the larger population skills mapping undertaken by migration and development agencies and other actors for sourcing individuals for specific work opportunities abroad.

> The current development and forthcoming launch of the UNHCR Digital Gateway will empower refugees to own their data and update it in real time. It will also enable UNHCR and its partners to have more up-to-date and comprehensive information on the population's skills, capacities, experiences, etc.

While the Digital Gateway remains in development and in locations where it will not be readily accessible, verification exercises, participatory assessments, community fora and individual counselling sessions provide opportunities to collect relevant population data, including family links in third countries, skills, languages and education levels. Self-service modalities [such as kiosks, my unhcr.org scheduling tools, Safe Mobility Offices (SMOs) and other tools that will form a part of the upcoming Digital Gateway] should include specific fields to improve the ability of refugees to record, access and update their information.

The quality of UNHCR's operational data may also be improved through the deployment of supplementary tools like KoBo forms to capture additional knowledge of the refugee population concerning skills, languages and family linkages. Understanding the data landscape outside of UNHCR can also support in this.

Once the skills, capacities, needs and relevant gaps of the population are better understood through regular data collection, specific interventions in upskilling, certification, referrals to relevant service providers and support for skills-based or rights-based pathways referrals can be incorporated in regular livelihoods, education and protection programming and service delivery.

Similarly, at destination States, data on profiles and needs of the population in the departure countries could instruct specific programme design, including the need and availability of training, the relevance of pre-existing migration agreements and frameworks for refugee inclusion, integration support upon

arrival, etc.

While UNHCR data on the population remains useful, partners working with communities, and particularly refugee-led organizations and diaspora groups, often have information background of individuals or could include routine questions to capture this data in interactions and outreach. Data-sharing agreements (DSAs) can also improve efficiency by streamlining information-sharing between UNHCR and partners. In situations where States, UNHCR and other partners maintain parallel data-collection systems to enable wider access to mobility pathways, UNHCR may wish to work with the relevant actors to ensure that those feed into national migration systems through innovative tools such as SMOs and similar initiatives.

The collection of data to better understand the population profiles could also include assessment of reasons for onward movement that could form the programmatic response under Pillar V (Safe, regular and complementary pathways) of UNHCR's Route-Based Approach. Refugees often move onwards due to lack of options for work or study and perceived eligibility for family reunification, among other reasons. UNHCR needs to be consistent in understanding the reasons for this movement and identify partners along the route who are actively involved in building a comprehensive response to the root causes as they relate to economic or education opportunities, family reunification or protection needs particularly in the context of complementary pathways.

**B)      Empower refugee self-ownership of data (Digital Gateway self-reporting)**

Refugees should be able to continuously access, verify and update their personal information to galvanize opportunities around complementary pathways—and these modalities should centre around the principle of individual data ownership. UNHCR is enabling these opportunities through the progressive development of self-service modalities that allow for continuous recording of data and for its individual ownership. The development and launch of the Digital Gateway will be an important breakthrough in providing data ownership to refugees. The VerifyPlus feature embedded in the registration attestations potentially also available through the Digital Gateway that will issue QR-coded certification on registration/legal status will also service to enhance integrity within complementary pathways processing.

**C)      Record complementary pathways assistance**

UNHCR's role in building the overall evidence base extends to ensuring that operational data is as reflective as possible of complementary pathways departures from countries of first asylum. This includes steps on the way to departure such as any forms of assistance, counselling, referrals, travel support, assistance with visa issuance or exit formalities. The UNHCR Operational Guidance Note – Complementary Pathways for Admission to Third Countries, Data Recording in proGres explains these procedures and should be socialized across all UNHCR field functions.

**D)      Data collection and sharing**

The work of complementary pathways requires efficient multi-stakeholder coordination, including information and data-sharing. Coordination between partners avoids duplication of data and is important for ensuring that partner data is triangulated with proGres and other sources of information. Before sharing personal data with third parties, UNHCR should assess related risks and generally whether the level of data protection afforded by third parties with whom personal data is shared is adequate (para. 44 GDPP). Prior data-sharing agreements between partners may be necessary, particularly where transfers of personal data are likely to be large, repeated or structural. Agreements also allow to specify data transfer modalities, limitations to onward sharing, mutual breach notification and the question of limited data retention.

## E) Monitoring and evaluation

It is essential to collect and assess information pertaining to the long-term protection outcomes of complementary pathways, including whether individuals can access durable solutions, through monitoring and evaluation frameworks. UNHCR is equally invested in ensuring parity of access, especially in terms of age, gender and diversity factors among individuals departing on pathways. The development and improvement of monitoring systems together with refugees and other partners (including State authorities) in destination countries will help enhance the global understanding of how these programmes contribute to third-country solutions and respond effectively to the protection needs of refugees, while benefitting the communities and States welcoming refugees.

Work on the comprehensive framework for programme evaluation is only commencing. However, UNHCR's participatory assessment framework may provide a useful tool when considering assessment of existing initiatives and using the outcomes of such assessment to improve programme implementation.

## PILLAR II: BUILDING PARTNERSHIPS AND COALITIONS

**For complementary pathways to scale, UNHCR relies on the knowledge and experience of its partners** such as refugees and their communities, States, IOM and other migration agencies, development banks, local partners, civil society, private sector entities and others.

UNHCR is part of this ecosystem of actors and often catalyses action around pathways-related work, while learning from all other stakeholders. In particular, UNHCR:

- **Galvanizes local inclusion and migration support initiatives:** UNHCR works closely with various development partners to ensure that refugees are included alongside their host communities in education, livelihoods and economic inclusion initiatives in the countries of first asylum. Destination States often have agreements with one or multiple States on support with accessing the labour market in sectors with significant labour shortages. The inclusion of refugees in such initiatives enhances their ability to compete for labour or education complementary pathways opportunities as well as leads to scale in skills-based complementary pathways.

- **Supports with accessing opportunities:** UNHCR's longer-term vision relies on sustained efforts to identify and strengthen local partnerships in the first countries of asylum and on the gradual strengthening of skills among appropriate actors to support refugees' access to pathways. At the start of this journey, UNHCR personnel, particularly in the first countries of asylum, are heavily involved in partner identification, capacity building, the development of advocacy strategies for law and policy change, and the creation of linkages with development and migration training initiatives. Once fully functional, these sourcing/support mechanisms are expected to work independently by drawing in local actors who are fully trained to provide the necessary support and preparation for refugees considering departing on pathways, while UNHCR retains a coordination role.

- **Builds in protection safeguards:** Partners offering opportunities in the destination States define their own eligibility and selection requirements around complementary pathways and fulfil pivotal roles in programme design, candidate identification, selection, transfer, entry and post-arrival support. UNHCR focuses on ensuring protection safeguards and, consequently, coordinates the engagement of various actors to ensure pathways are available to refugees, sustainable and protection-driven.
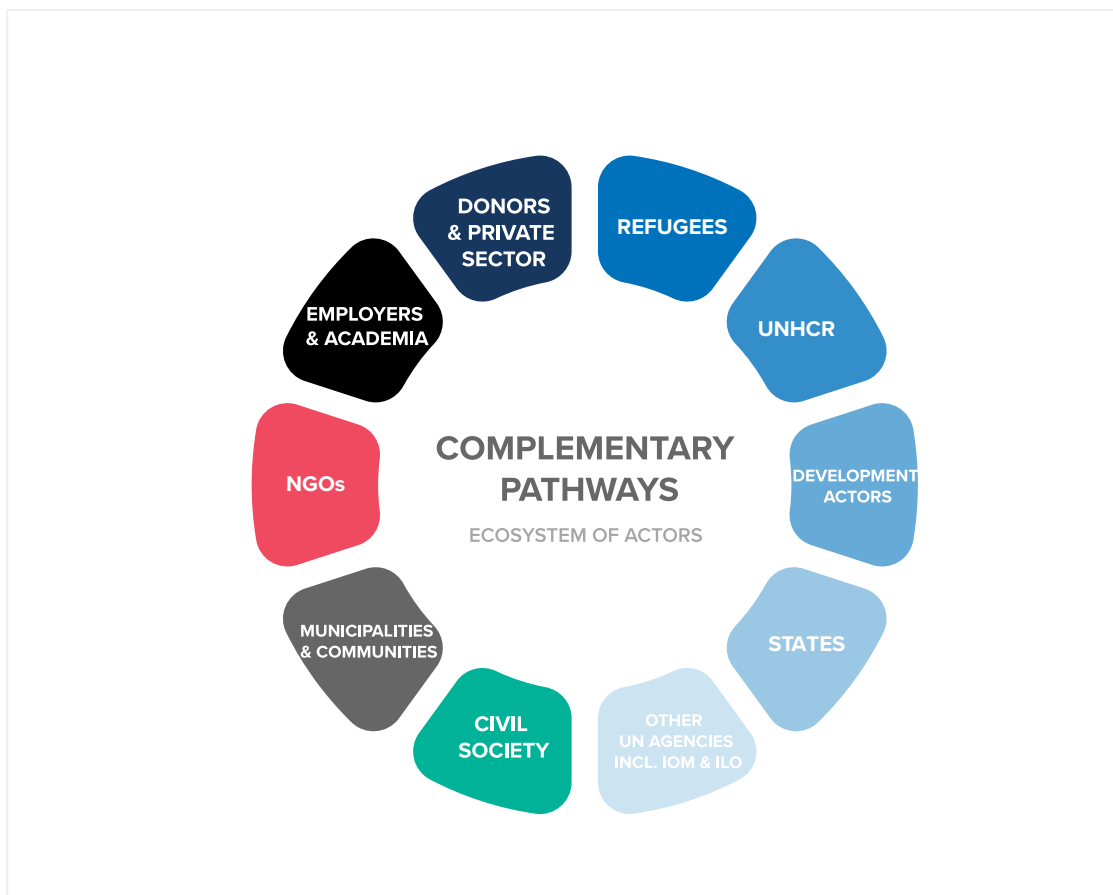
| **Figure 5:** *Ecosystem of actors in complementary pathways*

Some examples of partners in complementary pathways may include:

## DESTINATION STATES

Often different departments/ministries are in charge of separate components of migration, refugee admission and development work. Achieving complementary pathways outcomes requires enhanced coordination between various government bodies to ensure that the necessary flexibilities are built into the frameworks to enable access to training, support and eventual admission through complementary pathways.

## COUNTRIES OF FIRST ASYLUM

State authorities in the country of registration/first country of asylum are essential in ensuring complementary pathways are accessible. They often manage asylum registration, issue travel documents, exit permits, and have alternative methods for credential (skills and education) and relationship (family reunification) certification. They can also help ensure refugee protection throughout the complementary pathway journey by issuing protection-centred refugee travel documents and by providing the possibility for refugees to return upon completion of a contract or a study opportunity elsewhere. Large hosting States can work closely with UNHCR on the inclusion of refugees in local education, livelihoods and social protection systems, and, as such, are essential in complementary pathways preparedness.

## DEVELOPMENT ACTORS

These are entities that are engaged in the local development and support of the biggest hosting countries and that invest significantly in refugee inclusion. This includes enhancing access to registration and documentation, ensuring equal opportunities for education and certification, and facilitating refugees' access to the labour market. These actors also work to build the capacity of local governments to provide services to their population. The inclusion of refugees in these services is the ultimate point of connection between UNHCR and development actors. Linking up this work with

opportunities for third-country solutions through enhanced training, inclusion of refugees in education and training opportunities, access to documentation, information provision on opportunities abroad, and travel support is essential in building complementary pathways and empowering refugees to travel on those.

## IOM

IOM has specific experience in migration facilitation and is the global lead on migration law and policy, an important complement to UNHCR's global leadership role on refugee law and policy. It has been running skilling-to-hire programmes for many States that build the capacity of the local population and their skills against known work opportunities in the destination States. Ensuring that refugees are included in these infrastructural frameworks would be a major gain in attaining scale on complementary pathways. It may also be valuable to explore how the role of IOM could be expanded to include providing migration assistance to refugees in the context of enabling family reunification and offering skilling and migration support to those travelling on skills-based and/or humanitarian pathways.

## REFUGEE-LED AND DIASPORA GROUPS

Refugee-led and diaspora groups can disseminate accurate information, signpost to legal and administrative service providers, and assist with some of the administrative and migration-related components. Refugee-led organizations and diaspora groups may require additional fundraising and skills enhancement support. However, they are often best suited to fill gaps in administrative, legal and/or context-specific practical support for admission through complementary pathways by building information provision frameworks, tailoring and delivering messages to communities, supporting with form filling, etc.

## NON-PROFIT/CIVIL SOCIETY/LEGAL SUPPORT PROVIDERS

Legal services providers, such as national and international legal organizations (e.g. IRAP) provide specific assistance and counselling to refugees free of charge on family reunification procedures. Many, such as Talent Beyond Boundaries (TBB) and local livelihoods partners, have been trained to support with sourcing against specific employment opportunities. They assist with soft skills, CV building and visa applications, conduct legal research to inform advocacy, build the capacity of partners to offer on-the-ground support through trainings and/or by providing oversight, and produce materials/tools on procedures and eligibility.

## PRIVATE LAW FIRMS

Private law firms commit hours to representing refugee families, assist with applications, perform strategic litigation, conduct legal research to inform advocacy for family reunification and skills-based pathways admission, hire refugees on labour mobility, build the capacity of partners to provide legal support through seconding resources, trainings and/or by providing oversight, and produce accessible information materials/tools on procedures and eligibility. These services are provided on both pro bono and commercial basis. Engagement with both types of legal support through cooperation, coordination and training could be considered.

## PRIVATE SECTOR (INCL. LAW FIRMS)

Private sector entities are key in opening up skills-based pathways (education and labour) as both employers and advocacy actors for government-administered flexibilities to be put in place. They could equally provide financial solutions (loans and philanthropic support, and repayable grants).

## OTHER IMPLEMENTING AND OPERATIONAL PARTNERS OF UNHCR

Such entities can include complementary pathways and family reunification assistance in existing and new Project Framework Agreements (PFAs) and operational partnerships with protection/legal/community outreach.

## Private sector partnerships for pathways

Private sector engagement is about identifying and working with partners who bring both financial and non-financial value to UNHCR's work around complementary pathways. Aside from funding, these partnerships play an important role in influencing attitudes and bringing wider support for refugee mobility—for example, by influencing actors like employers, companies, authorities and institutions to generate opportunities for refugees. Different models of engaging with private actors, including partnering with individual companies, developing shared value partnerships and engaging with philanthropy, can benefit work around pathways.

See examples of UNHCR's best practices working with the private sector, and explore the Private Sector Partnerships (PSP) SharePoint site.

Ensuring that the issue of refugee inclusion in migration policies and frameworks is addressed in relevant global, regional and national fora can support expanding refugee access to migration frameworks, encourage policy changes and result in more opportunities in destination States. Topic-specific discussions, where possible, also serve an important role in advancing refugee inclusion in global markets by building political will and commitment throughout the world.

Annex 5 contains useful considerations for Operations to take into account when assessing partnership opportunities in the context of complementary pathways.



*Abdul has come a long way from the conflict in Syria to his new life in Brazil. He is among more than 4,000 Syrian refugees welcomed by Brazil since it became the first country in the Americas to offer special humanitarian visas to those fleeing Syria in 2013. © UNHCR/Jeoffrey Guillemard*

## PILLAR III: ADVOCATING FOR LAW AND POLICY CHANGES

The current migration framework often remains inaccessible to refugees due to inherent obstacles and limitations on both departure and destination sides. Some of these obstacles include:

**Legal challenges**
- Ensuring that international protection needs are retained through the pathway;
- Availability of legal pathways for refugees;
- Ensuring pathways are additional to asylum and resettlement;

**Gaps related to skills and credentials**
- Gaps in education and employment due to flight;
- Lack of access to formal employment in countries of asylum;
- Language capacity and lack of access to language training and certification;
- Lack of access to upskilling and training (soft and professional skills) to qualify;
- Inequity of education and training systems and their incompatibility;
- Confirmation of credentials between countries.

**Clear and legitimate information and legal procedures**
- Lack of access to clear and legitimate information on opportunities and application processes and requirements;
- Limited understanding of employment and education systems and requirements in other countries;
- Limited understanding of procedures for movement/family reunification and subsequent integration;
- Limited understanding of rights and responsibilities during travel and upon arrival;
- Limited understanding of procedures for subsequent legalization and stay.

**Documentation**
- Lack of access to documents confirming relationships, credentials and qualifications;
- Lack of identity and travel documents.

**Departure requirements**
- Inability to obtain exit visas and required fees;
- Requirements for police certificates and other documents from country of nationality or current asylum.

**Financial requirements**
- Personal costs for processing/application/departure/flight/integration;
- Programmatic costs to universities, employers, families, etc.

**Visa-specific requirements**
- Lack of access to bank accounts and financial history;
- Need to provide proof of intention/ability to return to country of origin/current stay;
- Requirement of national passports or other forms of valid travel documents.

**Integration and subsequent legalization upon travel**
- Needed support in case of employment/education contract end;
- Lack of a clear pathway for regularization or return to first country of asylum, if desired;
- Lack of support with necessary procedural steps upon arrival for legalization and subsequent stay arrangements.

Hence, an analysis of legal frameworks evaluating existing various visa requirements, ways these limit refugee access to pathways and limitations in countries of first asylum (such as exit permits) is essential. UNHCR Rights Mapping and Analysis Platform (RiMAP) provides means to evaluate some of

the relevant components and limitations and come up with policy and advocacy messages to influence authorities in making the necessary systemic changes to facilitate accessibility and availability of complementary pathways. Partnerships with migration agencies, legal providers and migration experts to undertake the analysis and come up with options best suited for refugees and the facilitation measures required are essential in this area.

The analysis of trends and shortcomings of legal systems also feeds into an evidence-based advocacy strategy developed and implemented by UNHCR in destination and departure States and globally. Advocacy for flexibilities and, where possible and needed, legislative/policy change may take into consideration commitments made by States in the context of the GCR, the Global Refugee Forum (GRF) and the High-Level Officials Meeting (HLOM).

**Some of the questions to consider when undertaking the initial analysis may include:**

- Which existing visa streams are best suited for refugee admission through complementary pathways?

- What concessions and flexibilities (visa requirements such as waivers of police certificates from countries of origin, flexibility with regards to original documents from countries of origin/current stay, financial waivers, evidentiary waivers, remote processing, etc.) would be necessary (if any) to enable refugees to access complementary pathways?

- Are there bilateral/multilateral agreements in place that facilitate migration to the country and, if so, for which purposes?

- Could refugees be included in these agreements? If so, what changes would need to be applied for their unhindered access?

- What support do refugees require in accessing complementary pathways from the destination countries (e.g. application, form filling support, access to training, language training, certification of skills, credentialling)?

- Are exit permits required to depart and are those accessible to refugees?

- If not, what law/policy/administrative flexibilities would need to be implemented for unhindered departure?

- What integration support is necessary for complementary pathways arrivals (broken down by pathway at hand)?

- What services exist and how can they be leveraged for complementary pathways arrivals, based on pre-identified needs?

- Is there a monitoring and evaluation framework set up for the purposes of measuring programme outcomes and identifying necessary changes?

- What are the rights afforded to migrants legally arriving in the country for work/study opportunities and how can it be assured that those are fully accessible to refugees?

- What are the legal provisions for extended stay available in the migration framework, including work-related residency permits, stay requirements, naturalization requirements, etc.?

*(For specific context assessments for sending and receiving Operations, you may consult Annexes 6a and 6b).*

**Upon consideration of the above questions, Operations on both destination and departure ends may consider the following next steps when designing and implementing complementary pathways programming in line with the protection considerations and key principles in chapter 9:**

- **Identify the most suitable visa options for refugee admission within the legal migration framework at destination States:** Law firms specializing in migration as well as actors working in legal migration, including IOM, ILO, private sector companies and others, are valuable partners in this space. UNHCR may work with them to conduct a legal analysis to identify the best legal route available, flexibilities it may require to ensure refugees' access and protection, and options for legal stay and/or return to the first country of asylum.

- **Identify and apply refugee-specific flexibilities for accessing complementary pathways, and ensure that the international protection needs and main rights of refugees are met:** Ensuring refugees can access regular migration may entail instituting more flexible legal and administrative procedures, such as simplified processes, to address the specific difficulties and risks refugee applicants encounter. This requires a comprehensive understanding of the obstacles refugees face. Initiatives focused on the removal of practical barriers may include specific financial requirements and guarantees (visa fees), documentary requirements, alternative methods of confirmation of work-/study-related credentials, and an alternative approach to relationship verification for family reunification.

- **Ensure access to identity and travel documents:** Access to refugee travel documents contributes to protection from refoulement. Documentation issued for the purposes of travel also serves as a proof of identity required to access services (education, financial, etc.). It is, therefore, a protection tool valuable beyond the travel opportunities it offers. Operations should continue their advocacy on the issuance and acceptance of machine readable multi-voyage refugee travel documents, which include but are not limited to Convention Travel Documents (CTDs). These should be extendable at the consular offices at destination States and have five or more years in validity. In line with the 1951 Convention, the fees charged for such documents should not exceed the lowest scale of charges for national passports. The issuance of travel documents for persons in need of international protection should be integrated into existing State mechanisms to ensure fast and efficient procedures and to save resources. Alternative means of documentation that would provide for similar safeguards may also be considered by States not party to the 1951 Convention or the OAU Convention, or where delays and other barriers to asylum procedures render fully ICAO-compliant travel documents less available.

- **Ensure refugee inclusion in national systems and services at departure States (education including TVET, financial inclusion, employment):** Create linkages with development and local inclusion initiatives to enable access to training, skilling/upskilling, skills certification, and language training and certification. This can include building and improving skilling-to-hire models, that match employer requirements in destination countries and have potential dividends towards ensuring refugees eligibility for skills-based pathways.

- **Consider options for scale through partnership and expansion within the existing migration framework and via bilateral arrangements for training and upskilling of foreign workforce to cover market gaps:** Joint programming with IOM for inclusion of refugees in regular pathways/the existing migration system for nationals of host countries can be explored.

- **Ensure the role of first countries of asylum is well understood through advocacy towards inclusion of refugees in national and international training and education frameworks:** Benefits to the countries of first asylum are often not fully articulated in complementary pathways discourse. In addition to responsibility-sharing, countries of first asylum may benefit from remittances and appreciate the widening protection space created through complementary pathways. First countries of asylum are essential for complementary pathways in a number of ways and advocacy around those is key to successful programming. One of the key components

of their role is facilitation of documentation acquisition and freedom of movement, through exit permit issuance.

## PILLAR IV: DEVELOPING POLICY AND BUILDING CAPACITY

### A)      Policy and guidance

> Ensuring that the international protection needs of those travelling on complementary pathways are protected at all times is a paramount obligation of UNHCR. This entails ensuring that the international community protects such individuals against return to the places of danger.

UNHCR's supervisory responsibility is set out in paragraph 8(a) of its Statute, and in Article 35 of the 1951 Convention and Article II of the 1967 Protocol. **Monitoring State compliance with refugee-specific international obligations, including respect of family unity, and intervening where the regulatory system does not offer adequate protection of refugees' rights is a compulsory function of the organization.**

In line with these, UNHCR is the primary agency to ensure that protection principles are embedded within the design and implementation of complementary pathways and that relevant policy positions and guidance are developed, disseminated and well understood by the diverse partners involved in complementary pathways work.

Responsibility for monitoring practices, context-specific challenges and associated risks at the local level sits with UNHCR Country Operations and Regional Bureaux. This, in turn, will inform support offered to States to overcome hurdles identified and inform targeted advocacy, while building infrastructural support for refugees accessing complementary pathways.

### B)      Knowledge and skills development

UNHCR Operations that directly deliver protection, solutions and assistance services typically have regular training and capacity development initiatives targeting UNHCR staff and partners. These should strive to include relevant content on complementary pathways, including on preserving family unity.

Based on an analysis of the protection and local solutions context, capacity gaps and needs, the relevant trainings may include:

- an introduction to complementary pathways;
- relevant applicable legal frameworks for family reunification through national procedures;
- existing support systems (of partners) to help refugees access complementary pathways;
- relevant UNHCR, national and partner policy and guidance and necessary advocacy messages, including the role of first countries of asylum;
- linkages with existing and ongoing inclusion (livelihoods and education) initiatives, development work and other activities to ensure refugee inclusion in these with the potential dividend of accessing complementary pathways;
- the role of development and migration actors.

### C) Communications with Communities (CwC)

Communicating with refugee and diaspora communities promotes knowledge and agency by ensuring access to accurate information on eligibility criteria and reliable sources of support. Refugees within these communities are best placed to be agents of information-sharing. Networks within countries of departure and diaspora should be encouraged and supported.

Offices may consider developing a communications plan including some or all of the following elements or including those in broader communications on rights, protection procedures and services:

- **harnessing opportunities to communicate with communities**, such as through regular community forums, meetings with community leaders and participatory assessments to disseminate information, identify potential beneficiaries/support needed, in line with UNHCR's Operational Guidance on Accountability to Affected People (AAP). Refugee-led organizations should be consulted in the design and delivery of key messages and play a key role in devising and delivering specific supports and services;
- **sharing information on procedures and available support** (including via platforms such as UNHCR's Opportunities platform, UNHCR's Help site or partner platforms);
- **developing specific tools to disseminate information**, such as WhatsApp channels, adjusted to the needs of the refugee population and with the engagement of refugee and diaspora communities to ensure relevance;
- **identifying refugees departing/arriving on complementary pathways** and their stories and challenges and flagging them to External Relations/Communications colleagues to produce stories, videos, etc.

For more ideas on the role of communications, please consult chapter 14.

# 11.    RELEVANT UNHCR FUNCTIONS

In line with the Roles, Accountabilities and Authorities (RAAs), Country Operations, Regional Bureaux, Divisions and Entities at HQ each serve functions in support of complementary pathways programming and support (please refer to Annex 7 for more details on the distribution of some of the roles and responsibilities that would be applicable in this context).

**HQ Divisions and Entities** lead on the development of the global strategy on complementary pathways and support various partners including States in developing flexible programmes to ensure refugees can access legal pathways and receive any support required. They also undertake structured and strategic global advocacy and consistently engage with global stakeholders.

**Regional Bureaux** provide regional oversight. This can include developing regional complementary pathways strategies and incorporating complementary pathways components in other strategies (e.g. livelihoods, education, data, protection) with the support of the Division of International Protection (DIP). It can also include advocating with, engaging with and coordinating regional actors, such as development actors, and managing regional partnerships to support resource mobilization and advocacy in order to facilitate access to complementary pathways.

In **Country Operations**, UNHCR's activities in support of complementary pathways cross-cut functional units with elements of registration and data management, communications, community-based protection, external engagement, solutions and child protection, among others. Integrating complementary pathways activities, as per the table below, into existing roles makes effective use of existing resources and ensures utmost outcomes.

It is recommended that each Protection/Solutions unit at country office and Regional Bureaux level establishes a **complementary pathways focal point**. For smaller Operations with limited capacity, Bureaux are best placed to undertake the coordination functions and work with local partners to identify gaps, trends and develop strategies on addressing them. The complementary pathways focal point coordinates with relevant functional units within UNHCR at country, regional and HQ level and with partners to support improved access to complementary pathways and create linkages with inclusion activities and development work in the local context. These focal points are particularly important at the onset of building UNHCR engagement in complementary pathways and may be mainstreamed into protection and solutions work at a later stage when relevant partnerships are in place.

**While not all Operations may have the following functions, the below are suggested activities for some of the main functions. These may be adapted based on local capacity:**

| UNHCR function | Activities |
|---|---|
| **Protection officers (Snr.)** | • **Ensure complementary pathways are included in protection strategies;**<br><br>• **Develop and deliver advocacy messages** to governments and other relevant entities to ensure:<br>a) **In departure States:** refugee inclusion in training and upskilling; access to credentials recognition; inclusion in local education and economic inclusion programming; access to refugee travel documents (compatible with ICAO standards); issuance of exit permits, etc.;<br>b) **In destination States:** visa regimes with flexibilities compatible with refugees' needs and realities; inclusion in migration frameworks; access to integration and support services including legal counselling; support with access to rights and services;<br><br>• **Coordinate all aspects of complementary pathways activities** as part of the Operation's protection strategy:<br>a) **In departure States:** at the earliest stages in pathways development or implementation, consult with education and livelihoods colleagues to assess and understand the nature and availability of a "pipeline" of qualified or suitable candidates, means to access them, gaps in their training/experience, and the capacity to support them in navigating the process;<br>b) **In destination States:** analysis of migration laws; identification of flexibilities; linkages with reception and integration partners; outreach to private sector, development actors and others of relevance to ensure a system for admission, protection and support is available;<br><br>• **Identify partner needs and work to enhance their capacity:**<br>a) **In departure States:** for support with preparation, sourcing and referrals for support services and/or submission (humanitarian pathways);<br>b) **In destination States:** to ensure relevant migration facilitation and integration support;<br><br>• **Coordinate the network of partners** by linking departure and destination countries. |

| | |
|---|---|
| **Livelihoods/ economic inclusion/ development officers** | • **Work with protection and solutions teams to identify and train partners** (implementing and operational) to support with complementary pathways activities, including skills training, soft skills/interview skills building, CV drafting, and support with interviewing and departure;<br><br>• **Include complementary pathways options** as part of the local inclusion strategies of UNHCR/partners;<br><br>• **Build synergies** with training and upskilling opportunities on the ground;<br><br>• **Link up with development and UN partners** (e.g. IOM) to include refugees in training and migration programmes currently in place;<br><br>• **Support eligible refugees** with work experience (e.g. through internships) to ensure they meet the necessary requirements for labour mobility. |
| **Education officers** | • **Ensure complementary pathways opportunities** are built into education strategies at country level;<br><br>• **Disseminate information** on complementary pathways opportunities;<br><br>• **Support partners** providing academic guidance, counselling and other services to prepare students for application and selection;<br><br>• **Encourage DAFI and other scholars in the country of asylum to be systematically registered with relevant talent catalogues or similar databases**;<br><br>• **Enhance information provision frameworks** to ensure opportunities are known;<br><br>• **Support through referral/negotiations with service providers** to ensure access to language testing, access to computers, etc. |
| **Resettlement /Solutions** | • **Facilitate access to travel documents and issuance of exit permits and/or police certificates** (where necessary);<br><br>• **Facilitate referral/refer to additional service providers** (including medical);<br><br>• **Support with departure arrangements** by referring to relevant partners;<br><br>• **Link up with other functional units** in education/livelihoods/protection to create strategies around training/upskilling/matching/departure support. |
| **Community-based protection** | • **Craft and disseminate messages, and develop information campaigns** for the availability and requirements of complementary pathways;<br><br>• **Work with community leaders to develop communication guidelines and referral frameworks** to assist individuals with training and access to opportunities. |

| Registration/ DIMA/ Information management | • **Ensure accuracy and completeness of data entered into proGres and through Digital Gateway** tools in Country Operations with UNHCR registration;<br><br>• **Ensure that relevant data fields** (skills, prior training, certificates, work experience, education level, field of study, language capacity) **are consistently included in data-collection exercises and information management reports and dashboards.** This can be achieved through the Digital Gateway or the development and launch of appropriate data-collection tools (e.g. Kobo);<br><br>• **Provide guidance on data entry**; **analyse data and trends and issue reports and findings;**<br><br>• **Work with other UNHCR teams (protection, solutions) to develop and implement self-service tools and forms that feed into proGres** and reflect on the above data fields. |
|---|---|
| External relations/ comms | • **Support with communication strategies and the development of concrete messages;**<br><br>• **Create publicity** around successes and lessons learned;<br><br>• **Support with partner identification and network/coalition building efforts**, including with the private sector;<br><br>• **Coordinate communications** around private sector-driven initiatives as well as those led by other partners;<br><br>• **Engage with global, regional, national processes** that can advance opportunities and/or draw allies in lifting obstacles. |

# 12.    PLANNING AND REPORTING

Operations should consider the key areas of UNHCR's engagement in complementary pathways as well as the five pillars of engagement in family reunification as part of their strategic planning processes. The degree and nature of UNHCR activities under each of area will be based on an analysis of the country context; this can include analysing the legal and administrative framework, the political and security situation, the needs and gaps in support for complementary pathways, the capacity of partners and the degree of inter-agency coordination.

For comprehensive guidance on the multi-year planning and programming processes and the COMPASS results indicator framework, operations can consult the UNHCR Programme Handbook. To measure progress and achievements, the UNHCR COMPASS results framework includes reporting for complementary pathways-related activities under "Core Impact Indicator 4.2b Number of people who departed through complementary pathways", and "Core Outcome Indicator 15.3 Number of people admitted through complementary pathways from the host country".  For guidance on the use of proGres for recording complementary pathways-related activities, refer to the UNHCR Operational Guidance Note: Complementary Pathways for Admission to Third Countries Data Recording in proGres.

# 13.  MOBILIZING RESOURCES FOR COMPLEMENTARY PATHWAYS ACTIVITIES

**For UNHCR:** While it is imperative that core funding remains available to support overall functioning of the organization, tapping into development funding and other sources of funding not traditionally relied upon by UNHCR Operations might offer a unique way of supporting internal needs for the development and implementation of complementary pathways and building the necessary partner infrastructure for such implementation. Partnering with development and UN agencies and actors implementing programming for host communities could also provide an innovative way to support UNHCR's work in this area. Additionally, joint funding proposals led by some of these partners and reliance on secondments from partners (law firms, States and others) enable UNHCR to maintain an agile and responsible structure needed to launch and maintain complementary pathways engagement.

**For partners:** Supporting partners (particularly at a local level) with their fundraising initiatives helps UNHCR to build the partnership and referral structures necessary to support individuals' access to complementary pathways. This can be achieved through letters of support, direct outreach and, in some instances, partnership agreements that channel funds, among other things.

**For refugees:** UNHCR and its partners should consider innovative financing models, including low-interest loans, crowdfunding campaigns, reimbursable grants and the creation of funds to support individuals, employers, sponsors and others who are developing and launching complementary pathways. Many such initiatives that fund incidental expenses related to travel or visa acquisition are already on the way. Some examples include reimbursable grants by Pathway Club and the forthcoming launch of the Global Sponsorship Fund. Other similar initiatives can be put in place through the collaboration and innovative thinking by multitude of actors, including the private sector, microfinance institutions, States and others.


# 14.  INTEGRITY AND ACCOUNTABILITY

Complementary pathways are implemented by a plethora of partners, who support with various stages of the individual's journey including in identification, referral and selection of candidates, departure, post-arrival formalities, monitoring and evaluation. UNHCR in principle will not implement all stages in a complementary pathways programme. **Consequently, in this ecosystem of multiple partners, preserving integrity also becomes a shared responsibility**.

UNHCR's overall response to matters of fraud and integrity is guided by the Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons, its Administrative Instructions on the Procedures and UNHCR's General Policy on Personal Data Protection and Privacy. As complementary pathways involve shared multi-partner processes, the organization's engagement in ensuring integrity will differ from that required of activities where UNHCR is involved in all stages of the process. Further guidance on these issues will be added as the future of registration at UNHCR becomes better defined.

More information on responding to suspected fraud and disclosure of actual fraud is available in Annexes 8 and 8a.

# 15.    COMMUNICATIONS

**Communication can play a key role in helping advance access to complementary pathways for refugees including by raising awareness, fostering empathy, supporting advocacy goals and influencing policy changes.** Compelling narratives that focus on the stories of people with lived experience of forced displacement combined with data on the contributions they can bring to third countries can help lift the barriers preventing them to access international opportunities. Communication can also attract partners and donors and mobilize support and resources towards creating more safe pathways for refugees.

To this end, colleagues can:

**A)      Work jointly with stakeholders such as the Task Forces and key partners to elevate visibility of complementary pathways including by:**
- Developing communication strategies with clear objectives, target audiences and action plans to support their advocacy efforts;
- Crafting clear messaging on the need for and value of complementary pathways tailored to different audiences;
- Highlighting key successes and challenges including by leveraging media and press opportunities, and high-level events;
- Developing and disseminating visibility materials such as brochures, social media materials, videos and stories that showcase innovative approaches, existing programmes, while also highlighting key barriers that prevent refugees from accessing migration pathways on an equal basis as everyone else.

**B)      Integrate complementary pathways into their Operations/Bureaux communication strategies to:**
- Increase visibility and promote understanding of complementary pathways within the organization including by:
    a) using strategic communication tools like broadcast messages, internal communities like Viva Engage and Teams, internal newsletters, Intranet articles and other means to promote work around complementary pathways;
    b) organizing brown bag events and similar initiatives to connect colleagues working on complementary pathways and share experiences/lessons learned;
    c) holding trainings and providing support to colleagues across different units and establishing an internal coordination group around pathways for promoting understanding and engagement of colleagues.
- Elevate complementary pathways among external audiences including by:
    a) producing stories and promoting refugee-led storytelling opportunities across UNHCR external channels (unhcr.org, social media, GCR digital platform and others);
    b) incorporating complementary pathways in talking points and presentations to governments,  civil society, UN bodies, development actors, private sector and others;
    c) leveraging on flagship UNHCR campaigns and events, and international days including World Refugee Day, International Day of Families, International Day of Education and others, to highlight complementary pathways.
- Harness opportunities to communicate with communities on complementary pathways, such as regular community forums, meetings with community leaders, and participatory assessments to spread information.

Please refer to this sample communication plan as a template for developing communication strategies inclusive of complementary pathways. All communication materials developed should be in line with UNHCR's Ethical Communication Guidelines. Talking points for pathways are available in Annexes 10a, 10b, 10c and 10d.

# 16.  RESOURCES

The list below highlights some of the key resources that are essential for engaging with complementary pathways work.

**Complementary pathways general resources**
- Complementary Pathways Operational Guidance website
- Complementary Pathways Glossary of Key Terms
- Complementary Pathways e-learning course
- Complementary Pathways Community of Practice (internal)
- 2023 Global Refugee Forum pledging documents
- UNHCR.org webpage on complementary pathways
- Intranet page on complementary pathways (internal)

**Data on complementary pathways**
- OECD-UNHCR Safe Pathways for Refugees Report IV

**ExCom Conclusions and other key documents**
- Conclusion No. 117 (LXXV): Durable Solutions and Complementary Pathways - Adopted by the Executive Committee (2024)
- Conclusion No. 114 (LXVIII): Machine-Readable Travel Documents for Refugees and Stateless Persons - Adopted by the Executive Committee (2017)
- Conclusion No 49 (XXXVIII): Travel Documents for Refugees - Adopted by the Executive Committee (1987)
- Conclusion No. 13 (XXIX): Travel Documents for Refugees - Adopted by the Executive Committee (1978)
- Third Country Solutions for Refugees: Roadmap 2030
- Note on International Protection - Standing Committee 69th Meeting

**Operational Guidance**
- UNHCR Operational Guidance: Facilitating Family Reunification for Persons in Need of International Protection
- UNHCR Operational Guidance Note: Complementary Pathways Data Recording in proGres

**Global Task Forces**
- Global Family Reunification Network (FRUN)
- Global Task Force on Refugee Labour Mobility
- Global Task Force on Third Country Education Pathways
- Global Refugee Sponsorship Initiative

**Resources for refugees**
- [Opportunities](#) (scholarship portal for refugees)

- [Help.unhcr.org](#) (information for refugees)

# 17.    REFERENCES

For guidance on the use of proGres for recording complementary pathways-related events and assistance refer to [UNHCR Operational Guidance Note: Complementary Pathways for Admission to Third Countries  Data Recording in proGres](#).

# 18.    MONITORING AND COMPLIANCE

The Division of International Protection, Resettlement and Complementary Pathways Service, is responsible for monitoring these Guidelines globally, in consultation with the Regional Bureaux, who monitor and support their consistent application in respective Country Operations.

# 19.    CONTACT

The contact for these Guidelines is the Resettlement and Complementary Pathways Service, Division of International Protection, at [hqdiprcps@unhcr.org](mailto:hqdiprcps@unhcr.org). Inquiries concerning the context-specific application of these Guidelines and/or relating to individual cases should first be addressed to the relevant Regional Bureaux focal point/s. For additional support and guidance in implementing specific aspects of these Guidelines, consult the [UNHCR Complementary Pathways Community of Practice](#) and the [UNHCR Intranet Complementary Pathways for Admission to Third Countries page](#). Focal points at UNHCR HQ monitor and provide additional guidance on specific questions relating to the implementation of these Guidelines on the [Complementary Pathways Teams channels](#).

# 20.    DATES AND PLACEMENT

These Guidelines will enter into force upon issuance and will be reviewed by 31 December 2029. These Guidelines will be uploaded to the [Intranet](#) and in this [website](#).

# ANNEX 1

## Key differences between complementary pathways

| Basic features | Family reunification | UNHCR-assisted resettlement | Humanitarian pathways | Employment pathways Education pathways Private sponsorship pathways |
|---|---|---|---|---|
| **DRIVER** | Rights-based (& dependency-based) | Government – Humanitarian policy decision | | Employers – labour demand/ labour shortages |
| **IDENTIFICATION** | Self-identification | UNHCR (Exceptionally NGOs authorized by the resettlement States) | Self-identification or referrals by UNHCR, other international organizations, NGOs, States, academic institutions, etc. | Self-identification – Through open/targeted call for applications |
| **CRITERIA FOR ID** | Family links and dependency relationship | Specific protection needs as per the UNHCR Resettlement Handbook submission categories | Protection risk/special needs | Skills/qualifications Professional experience and/or education background |
| **BENEFICIARIES** | General population and persons in need of international protection | Recognized refugees | Persons in need of international protection | General population and persons in need of international protection |
| **REFUGEE STATUS DETERMINATION** | Generally required for the person in the destination country (Sometimes applications may be submitted prior to status confirmation) | Required by UNHCR or State | Depends on the programme. Evidence of needs of international protection is required | Generally, not required yet. Some evidence of PINP needed if administrative flexibilities are required for the case |

# ANNEX 1

## Key differences between complementary pathways

| Basic features | Family reunification | UNHCR-assisted resettlement | Humanitarian pathways | Employment pathways Education pathways Private sponsorship pathways |
|---|---|---|---|---|
| **SELECTION DECISION** | State | State | State | Employer / Academic institution |
| **LEGAL ADMISSION** | Generally, a family-related admission visa | Special ad-hoc admission | | Generally, work / study-related admission visa |
| **VISA PROCESSING AND TRAVEL COSTS AND ARRANGEMENTS** | Often self-covered (or supported by organization) | Covered by the resettlement State supported by IOM | Often self-covered Covered by the State or supported by the organization, depending on the programme | Covered by the employer / scholarship and/or self-covered (loan options) |
| **LEGAL STATUS UPON ARRIVAL** | Refugee status or other durable status at least equivalent to that of the family member in the receiving State | Refugee/protection status and/or permanent residency | Differs depending on the programme. Largely temporary protection status and/or asylum-seeker status | Largely temporary residency status (Canada best practice permanent residency) Differs depending on the programme |

# ANNEX 2
# UNHCR's roles in facilitating humanitarian pathways

**1** UNHCR's primary role in humanitarian pathways is focused on **advocacy**.

In particular, UNHCR advocates for:

- Governments providing individuals with refugee status upon arrival and access to a durable solution;

- Governments and project partners putting proper safety nets in place for those arriving in third countries on humanitarian pathways including access to existing settlement support services;

- Visas to allow recipients to bring family, determined on the basis of dependency;

- Ensuring that humanitarian pathways programmes do not become a substitute for resettlement. To this end, UNHCR strongly advocates with States that eligibility criteria for humanitarian pathways are aligned as closely as possible with the realities of global resettlement needs.

Other UNHCR roles in facilitating humanitarian pathways include:

**2** **Providing information about available programmes** to refugees through a community-based approach;

**3** **Facilitating exit formalities** for persons registered with UNHCR;

**4** **Supporting the establishment of structured monitoring mechanisms in destination countries** to monitor the protection outcomes of programmes and to ensure that settlement services meet the needs of refugees and are delivered consistently;

**5** **Ensuring that operational data is reflective of humanitarian pathways** admissions, departures and outcomes;

**6** <u>Exceptionally</u> and upon the request of project partners and in coordination between the Division of International Protection, concerned Bureaux and Country Operations, **supporting the implementation of programmes by**:

- identifying and screening cases in line with protection needs and referring cases to government or NGO partners; and/or

- confirming biodata and registration status with UNHCR and sharing data with project partners according to existing data-sharing agreements; and/or

- supporting partner processing of cases by assisting in screening for eligibility/protection criteria.

*Decisions on UNHCR's involvement in case processing should follow a coordination between the Division of International Protection, concerned Bureaux and Country Operations.*

# ANNEX 3
# UNHCR's roles in facilitating qualifications-/ skills-based pathways

**1** **Collect skills-related data of the refugee population**
This data may include education levels, work experience and languages spoken collected through verification exercises, participatory assessments, community forums and individual protection or counselling sessions. Innovative self-service tools (including Kobo tools, UNHCR Digital Gateway, WhatsApp surveys, etc.) are key to this process providing live updates of information about skills and education.

**2** **Provide technical advice to programme architects**
Such advice may include candidates' needs around reception, accommodation and post-arrival support including social, academic and psychosocial considerations. UNHCR can support partners to develop monitoring methodologies that improve programme effectiveness and produce lessons learned.

**3** **Provide information to refugees**
Utilize existing communication structures (including online platforms and refugee/diaspora groups) to disseminate information about available and upcoming opportunities, programme requirements, the legal and protection ramifications of leaving the host country (including re-entry bans and effects on family unity and prospects for family reunification), access to solutions and rights in the receiving country, and procedures around exit permissions. Refugees should also receive information that improves their literacy around fraud and exploitation risks in the context of skills-based pathways.

**4** **Identify partner organizations and support their growth**
UNHCR helps identify and build systems of partners, including refugee-led organizations, by lending its expertise on case support, data management, integrity and accountability, and coordination, among other areas.

**5** **Advocate with the authorities of the first countries of asylum**
The authorities of these countries play a key role in facilitating access to complementary pathways. Their engagement is key in discussions around the removal of refugee-specific barriers (e.g. facilitation of exit procedures/visas, lifting of re-entry bans, issuance of travel documents, access to credentials and qualifications confirmation).

**6** **Advocate with the authorities of destination countries**
The engagement of these countries is key in discussions around the removal of refugee-specific barriers such as lifting of "dual intent" provisions that bar access to visas; lifting of documentary expectations including as police certificates from countries of origin or original diplomas; and shifting towards a dependency-based model for family reunification.

**7** **Provide practical and administrative support and ensure integrity of programmes**
This can include confirming registration and facilitating exit procedures and travel documents issuance for successful candidates who are also registered with UNHCR (if required and requested by the receiving country/pathway provider and if it is operationally feasible in the sending country).

**8** **Work with partners such as IOM and development actors to ensure refugee inclusion in programmes designed for migrants**
This includes readmission agreements between destination countries and the countries of origin of large migrant populations that are also host to refugees, or including refugee-sensitive services in the

# ANNEX 3
## UNHCR's roles in facilitating qualifications-/ skills-based pathways

safe work systems established in higher-risk destination countries.

**9 Dispel misinformation about refugees and elevate their profiles as students and/or employees**
Complementary pathways are still a nascent concept in many countries. Therefore, the need for awareness-raising and myth-busting is essential. Often the experiences of individuals arriving through resettlement and asylum procedures tend to be conflated with those arriving through complementary pathways; this often results in assumptions made about the profiles and perceived readiness of refugee candidates for work and study.

**10 Provide integration technical advice to programme architects**
Such advice may focus on needs around reception, accommodation and post-arrival support including social, academic and psychosocial considerations. UNHCR can support partners to develop monitoring methodologies that improve programme effectiveness and produce lessons learned.

# ANNEX 4
# UNHCR's roles in facilitating sponsorship-based pathways

1. **Provide credible and publicly available information** about existing programmes to refugees and sponsors.

2. **Inform host country authorities about ongoing/planned sponsorship pathway programmes**.

3. **Confirm biodata and registration status for persons registered with UNHCR and/or issue attestation letters for third-country authorities.** UNHCR will be launching the Digital Gateway to the PRIMES registration system in 2024, which will permit refugees to share their data and registration status with UNHCR partners holding data-sharing agreements.

4. **Initiate Best Interest Procedures** in situations where the custody of children travelling with one parent needs to be clarified and where support is requested by third-country authorities.

5. **Advocate and cooperate with destination country actors** to:

   • share knowledge of the refugee population and their protection needs/profiles;

   • raise awareness around integrity risks and proper safeguarding; and

   • support the construction of effective monitoring and evaluation systems that capture protection outcomes such as the attainment of durable solutions, access to rights and services, integration levels, etc.

6. **Support authorities (national and local) and communities to design and implement integration programmes in destination States**, including community sponsorship programmes. These initiatives provide the bedrock for developing sustainable third-country solutions.

# ANNEX 5
## Assessing partnership opportunities
## Key considerations

The success of pathways relies on diverse partner networks. One of UNHCR's key functions is to identify local partners to build the support framework for pathways expansion and for integration upon arrival, and to support the growth of these networks over time. Partners bring a wealth of knowledge to UNHCR in areas such as migration where we are not the expert.

**To start off on complementary pathways sourcing and needs assessment activities, Operations may wish to keep the following key considerations in mind**:

### OPERATIONS AT THE DEPARTURE SIDE

**Are there local actors offering services like language lessons, CV building, vocational training and bridging courses, legal advice and support, etc.? Are these actors well-placed to carry out activities like identification, screening and referral?**

- Have these organizations worked with persons in need of international protection and/or complementary pathways programmes before?
- What kinds of support would these organizations require from UNHCR?
- Are these organizations located close to where the population lives?
- Do these organizations have an established presence?
- Would data-sharing agreements or information-sharing protocols be viable?
- What integrity safeguards do these partners have in place?
- How can UNHCR support them to become stronger?

### OPERATIONS BOTH AT THE DEPARTURE AND THE DESTINATION SIDES

**What possibilities are there to increase refugee-led support on the implementation of programmes or activities? This can include:**

- Information-sharing about different opportunities and programmes;
- Administrative support with applications;
- Identification of eligible candidates or population needs in accessing available pathways such as family reunification;
- Support provided to candidates to prepare for interview processes including CV preparation;
- Language support; and
- Referral to other service providers.

**What funding streams exist for partners—e.g. private sector funding, donor organizations, philanthropy, academia and universities, businesses and companies, etc.? How can UNHCR help to mobilize funds?**

**If deemed necessary, can any activities be streamlined into existing private partnership agreements? This can include information dissemination, data collection, advocacy, connection with international partners, training and capacity building of staff, identification, referral, etc.?**

# ANNEX 5
# Assessing partnership opportunities
## Key considerations

How accessible are partner services to refugees? Is transport available and accessible? Are there protection risks associated with these movements?

What types of coordination structures such as taskforces, working groups and others need to be in place? What are UNHCR's roles in these?

What kind of training and support do partners require and how can UNHCR support with this?

# ANNEX 6a
# Context assessment
## UNHCR sending Operations

### Legal and administrative barriers: Understand barriers and unlock them

Does the country of asylum issue machine readable refugee travel documents to persons in need of international protection?

Does the country of asylum impose exit fees?

What forms of travel documentation are available—e.g. Convention Travel Documents, foreigners' passports, ICRC travel documents, one-way travel authorizations, etc.?

Are travel documents: (a) extendable beyond five years; (b) renewable at embassies on the receiving end; and (c) machine readable, efficiently processed and generally accessible?

Are receiving country embassies accessible in the country? Can diplomatic cooperation and flexibilities be applied to overcome access issues?

### Needs identification: Identify needs to understand which pathways are more practical

Is profiling data available and does the population have the language, work and/or education levels for skills-based pathways? If protection or vulnerability factors are more predominant, rights- or needs-based pathways may be more appropriate.

Does data on family links in third countries exist?

Can UNHCR explore self-reporting mechanisms, such as self-service kiosks, to help build the evidence base?

### Understanding communities: Gather refugees' input on programmes

How much do refugees know and understand about pathways? Where are the knowledge gaps?

What does a "solution" mean to them?

How do context and environment influence access to pathways?

Are women (in all their diversity) able to access third-country solutions?

How much individual support do people need through the process?

What resources (skills, experience, financial, other) exist among refugee communities that could support access to pathways?

## ANNEX 6a
## Context assessment
## UNHCR sending Operations

How can refugee-led organizations support the implementation of programmes and the socialisation of information?

### Supportive environment: Identify service networks and possible partnerships

Are there organizations offering language lessons, CV building, vocational training and bridging courses, legal advice and support, etc.?

Are these organizations located near where refugees reside?

What support do these organizations need to improve service delivery?

What integrity safeguards do these organizations have?

What does the relationship-building process look like?

### Logistical and practical considerations: To be mapped and considered in programme design

In terms of locality, how accessible are services to refugees?

In terms of the UNHCR Operation, what are the available resources and staffing for complementary pathways?

How does the availability of resources affect the scope of activities envisaged? (i.e., should they be reduced to information dissemination and not more intensive programme support?)

What additional funding/resources are available to bolster capacity?

Do individuals have stable access to the Internet and/or phones?

How does the protection environment influence the pathways that should be prioritized?

# ANNEX 6b
## Context assessment
## UNHCR receiving Operations

### Protection environment: Refugees should be protected from refoulement

Do the authorities recognize refugee travel documents issued by a country of asylum? Are these documents renewable in the receiving country?

Is the country signatory to the 1951 Convention or the 1967 Protocol?

Is there a functional national asylum system?

### Law and policy: Protection safeguards should be embedded in legal and policy systems

Based on an analysis of the migration system, what are the most favourable visa options? Is a suitable visa (humanitarian visa, foreign student or worker visa, family permit) available?

Is the legal status on arrival permanent or temporary?

What rights and entitlements does the visa confer?

What are the existing legal options for family reunification?

Does the visa include the possibility for family members to travel?

### Solutions: Refugees should be reaching a sustainable and lasting solution

Can the validity period of refugee travel documents be extended at embassies of sending countries?

Can refugees access financial institutions and open bank accounts in the receiving country?

Can refugees extend their visa, apply for another type of visa or apply for asylum?

What are the pathways to permanent residency?

Is settlement support available (incl. language training, housing, access to public services, community connections and psychosocial wellbeing)?

### Programme design: Programmes should be designed based on refugee realities and incorporate administrative flexibilities

Are monitoring and evaluation frameworks built into programmes?

Is the country collecting admissions data for complementary pathways?

# ANNEX 6b
## Context assessment
## UNHCR receiving Operations

Are there clear and transparent eligibility criteria?

Are entry requirements, especially on language levels, documentary and financial thresholds, adjusted to refugees' needs?

What protection safeguards are built into programmes?

Are there integrity safeguards to mitigate and prevent fraud?

Is the programme scalable?

### Supportive environment: Identify and galvanize opportunities for support

Are there networks (universities, employers, communities, civil society groups, private sector, donors) to support complementary pathways?

Is there political will to support the expansion or creation of complementary pathways?

How can authorities be involved in discussions, awareness-raising and advocacy, especially around the need for refugee travel documents and inclusive visa systems?

How can communities help to advance pathways?

What funding streams are available?

How can the private sector get more engaged in pathways expansion?

# ANNEX 7
## General division of responsibilities

Country operations, Regional Bureaux and Headquarters are encouraged to put in place mechanisms for advancing complementary pathways in alignment with the vision set out in the 2030 Roadmap and the current Operational Guidelines, as well as UNHCR's commitments under the GCR and the UNHCR Strategic Directions 2022-2026 . These mechanisms may need to be adapted to reflect specific context, operational capacity and the recommended roles described in the table below. The table contains suggestions regarding the pathways-related activities of Headquarters, Regional Bureaux and Country Operations.

| | Headquarters (DIP, RCPS) | Regional Bureaux | Country Operations |
|---|---|---|---|
| **Data and evidence** | **Provide support to Bureaux to ensure that operational data is being recorded in proGres** (consistent with the guidance set out in UNHCR's Operational Guidance Note) and take responsibility for compiling, sharing and improving the quality of the complementary pathways global dashboard.<br><br>**Support Regional Bureaux and Country Operations in troubleshooting challenges** surrounding data collection in the field, **and initiate/lead discussions** around continuously improving the quality of pathways data and evidence-informed programming.<br><br>Through partner networks, **support States to develop harmonized and consistent practices** around recording pathways admission data.<br><br>**Develop and lead advocacy** around improving State reporting on complementary pathways admissions and departures.<br><br>**Maintain a knowledge base** of trends surrounding internal perceptions, attitudes and information needs on complementary pathways by UNHCR colleagues. | **Support Country Operations to socialize and implement UNHCR's Operational Guidance Note on recording pathways in proGres, and to ensure adherence to other important guidelines** including UNHCR's Data Protection Policy. This could require ongoing trainings and capacity building.<br><br>**Develop and lead strategy on collecting regional profiling data** to understand the potential role of complementary pathways as solutions.<br><br>**Compile and analyse data from Country Operations** to produce fact sheets, sitreps, lessons learned, best practices and other promotional forms of advocacy highlighting UNHCR's work on complementary pathways.<br><br>**Identify evidence gaps and information needs about complementary pathways, and proactively respond through targeted data collection and/or research.** This could include regular protection monitoring, and/or other forms of harmonized data collection throughout the region. | **Ensure complementary pathways activities are systemically recorded in proGres in accordance with UNHCR's Operational Guidance Note.** This requires that staff working across all protection and registration functions are familiar with the guidance.<br><br>**Continuously verify and update profiling data on refugee populations**, including through bulk updates of proGres and harnessing alternative data-collection platforms like KoBo, self-service kiosks or community surveys.<br><br>**Ensure the implementation of UNHCR's Data Protection Policy** in the handling of complementary pathways cases, including (where appropriate) by developing data-sharing agreements with key partners.<br><br>**Monitor the impact and outcomes of existing and emerging pathways programmes.** This may include looking at access issues, solutions, fraud and integrity, new risks (i.e. do no harm), and other longitudinal impacts of programmes. Identifying and working with individual cases to provide valuable feedback on the barriers and limitations faced in pathways can inform UNHCR's advocacy efforts. |

# ANNEX 7
# General division of responsibilities

| | Headquarters (DIP, RCPS) | Regional Bureaux | Country Operations |
|---|---|---|---|
| **Advocacy** | **Monitor State practices globally** to share best practices, initiatives and lessons learned that support efforts around increased flexibility and protection-informed pathways.<br><br>**Maintain close dialogue with State partners, donors, NGOs, private sector and other key partners** to provide timely information and reports on developments.<br><br>**Produce internal global advocacy and communication lines to promote consistent organizational messaging around pathways.** This includes creating content to highlight particular issues in line with the global advocacy strategy and making information accessible for an online global audience.<br><br>**Take responsibility for the regular production of the complementary pathways global dashboard**, with accompanying qualitative analysis of trends.<br><br>**Receive relevant information and developments** concerning challenges, State practices, case studies, and initiatives from Regional Bureaux and compile reports/tools for the purposes of building evidence for effective internal and external advocacy. | **Receive and compile regional data** on UNHCR operational assistance in the area of complementary pathways from Country Operations.<br><br>**Conduct analysis and produce regular quantitative and qualitative reports** on trends around complementary pathways.<br><br>**Ensure close dialogue with, and provide accurate and timely information and reports** to, donors, States, NGOs and other relevant members of communities of practice.<br><br>**Relay evolving information**, including challenges, successes, practices and trends, between Headquarters and Country Operations.<br><br>**Encourage the intensification of communication efforts and the development of communication strategies to raise the visibility of pathways.** This includes producing advocacy and communication materials such as regional fact sheets showing complementary pathways trends, challenges, State practices, case studies and initiatives from Country Operations. | **Monitor and share information with Regional Bureaux** on State practices, context-specific challenges and associated risks, initiatives and case studies to assist in building an evidence base for advocacy efforts.<br><br>**Include complementary pathways trends within regular country-level fact sheets, sitreps and communications** (where capacity and needs exist, produce dedicated communication material on the topic).<br><br>**Contribute ideas and tools to the Complementary Pathways Community of Practice and relevant Teams channels**, for the benefit of other colleagues working on pathways. |

# ANNEX 7
## General division of responsibilities

| | Headquarters (DIP, RCPS) | Regional Bureaux | Country Operations |
|---|---|---|---|
| **Coordination and support** | **Identify and manage relationships with global partners and encourage network building, knowledge-sharing and referral platforms** to ensure the agenda of complementary pathways builds in visibility and priority.<br><br>**Convene and coordinate routine global fora** bringing together complementary pathways partners to synthesize and advance work.<br><br>**Actively participate in other relevant fora** to assist in the coordination of efforts in advancing pathways, and promote UNHCR's role.<br><br>**Provide functional guidance and support to Regional Bureaux and Country Operations** and maintain close contact with colleagues working in the field (in collaboration with Bureaux) to provide ongoing support on emergent challenges and developments.<br><br>**Ensure that DIP personnel are kept informed and updated on key developments and trends in the pathways world**, by representing the complementary pathways unit during internal dialogues and meetings.<br><br>**Maintain regular communication channels with focal points in the Regional Bureaux** to promote the effective flow of key information. | Through regular working groups, **coordinate actors at the regional level** to promote dialogue, ensure coherence and collaboration, and facilitate information-sharing within the region.<br><br>**Proactively identify new partnerships and opportunities** to expand work through both traditional and non-traditional networks of actors. For example, organizations offering vocational or language training, recruitment agencies, community-based organizations, and unions can all bring expertise and contribute to robust referral and service networks.<br><br>**Provide technical support and guidance to Country Operations.** This is facilitated by maintaining regular communication with focal points in Country Operations.<br><br>**Engage with regional and national State authorities or representations** to ensure pathways are a priority on State and civil society agendas. | **Nurture existing and new local partnerships.** The role of partners will vary depending on capacity, national regulations, frameworks and historical cooperation arrangements. Proactively identifying those key partners and/or new dedicated partners and building their knowledge base is a key activity at country level. UNHCR stepping in to perform activities in the absence of organized partner networks may be a temporary necessity while these organizations develop bandwidth for assuming greater responsibilities.<br><br>**Provide fora for partner coordination and update meetings on pathways.** Also, establish referral pathways for UNHCR to send individual cases to a trusted partner to access support and services. This will involve drafting Memorandums of Understanding (MoUs), Data Transfer Agreements and/or Information Sharing Protocols (ISPs)).<br><br>**Work closely with refugee communities to build their literacy around pathways and abilities to navigate opportunities.** Access to complementary pathways is promoted when refugees are proactively supported and informed to identify solutions independently.<br><br>**Ensure the timely communication of information on the needs and situation of refugees** to all relevant internal and external stakeholders. |

# ANNEX 7
# General division of responsibilities

| | Headquarters (DIP, RCPS) | Regional Bureaux | Country Operations |
|---|---|---|---|
| **Sharing information and knowledge** | **Ensure organization-wide dissemination of guidance and continuous two-way feedback and communications mechanisms** between Country Operations, Regional Bureaux and Headquarters.<br><br>**Strengthen technical knowledge of pathways among UNHCR personnel** in coordination with GLDC, Regional Bureaux and Country Operations, including developing training in response to emergent needs.<br><br>**Set the global direction around pathways integrating essential AAP and CwC components**: participation and inclusion, communication and transparency, organizational learning and adaptation, feedback and response, inclusivity and non-discrimination, community-based approach, do no harm, and PSEA.<br><br>**Continuously advocate with global partners for improved eligibility and selection criteria in pathways**, which are refugee-centric, intersectional, and incorporate non-discrimination provisions.<br><br>With reference to the UNHCR Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons, **promote mechanisms for preventing and responding to fraud** in the pathways context to maintain the global integrity of the processes. | **Develop harmonized regional messaging on pathways** based on feedback from Country Operations and refugee communities, with support from Headquarters where needed.<br><br>**In collaboration with HQ, conduct regular training and capacity building with regional partners** including authorities, NGOs, and internally with UNHCR colleagues to strengthen knowledge and literacy around pathways Materials for trainings will be provided by HQ through the Community of Practice and other channels.<br><br>**Ensure that proper feedback and complaints mechanisms are embedded at regional and country levels**, including the designation of complementary pathways focal points.<br><br>**Promote mechanisms for preventing and responding to fraud in pathways cases** to maintain the integrity of the processes in the region. This includes regular monitoring and recording of fraud and integrity trends in the pathways context. | **Foster relationships with diaspora/refugee communities** to support with information dissemination and the identification of emerging developments, trends and challenges (including fraud and integrity), and promote literacy around complementary pathways.<br><br>**Support accessible information for refugees on pathways programmes**, including fraud and integrity, by disseminating information online, via social media, in print and via focal points through partner organizations and community structures.<br><br>**Apply CwC principles**, including ensuring accessible feedback and complaints mechanisms for communities are in place.<br><br>**Ensure that proper processes around addressing inconsistencies and fraud allegations are followed** in accordance with the UNHCR Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons and these Operational Guidelines. |

# ANNEX 7
# General division of responsibilities

| | Headquarters (DIP, RCPS) | Regional Bureaux | Country Operations |
|---|---|---|---|
| **Planning and reporting** | **Develop policies in response to evolving norms** and work closely with Bureaux to ensure that operational developments and challenges inform the Operational Guidelines on Complementary Pathways.<br><br>**Set global standards, guidelines and directions for complementary pathways programming and UNHCR's roles.**<br><br>**Lead the tone and direction of strategy**, in alignment with UNHCR's commitments under the GCR, the 2030 Roadmap, and the UNHCR Strategic Directions 2022-2026.<br><br>**Provide guidance to Regional Bureaux and Country Operations** on the inclusion of complementary pathways in planning for protection.<br><br>**Lead the inclusion and continual review of pathways-specific indicators** in essential results-based monitoring tools such as COMPASS.<br><br>**Continuously advocate with States for flexible, protection-centred and sustainable programmes**, incorporating the guiding principles of complementary pathways. | **Ensure overall strategic and operational coherence throughout the region** in alignment with the 2030 Roadmap, UNHCR's commitments under the GCR and the UNHCR Strategic Directions 2022-2026. It is recommended that regional strategies are developed highlighting action plans for advancing complementary pathways, and that Regional Bureaux support Country Operations in developing context-specific SOPs and strategies.<br><br>**Socialize the current guidance as well as COMPASS indicator guidance relevant to complementary pathways and support adherence among Country Operations.**<br><br>**Consider developing regional strategies and priorities for pathways as part of solution strategies or as standalone ones.** Ensure pathways activities are prioritized and included as an integral part of the multi-year protection and solutions strategies, including the need for dedicated staffing and resources.<br><br>**Ensure that Country Operations throughout the region include regular monitoring, risk identification and management, political, situational and data analysis as integral elements of pathways strategies.** | **Ensure that UNHCR's objective-setting and planning processes for the country are aligned with global, regional and country-level priorities and strategic objectives** including the 2030 Roadmap, UNHCR's commitments under the GCR, and the UNHCR Strategic Directions 2022-2026.<br><br>**Identify relevant key stakeholders and develop multisectoral action plans**, involving objectives that can be measured against the Results-Based Management framework indicators on complementary pathways.<br><br>**Develop country-level strategies, SOPs and theories of change** for complementary pathways, in consultation with Regional Bureaux.<br><br>**Ensure focal points are designated** for complementary pathways liaison with partners, communities and colleagues. |

## ANNEX 8
# Ensuring integrity
# and responding to suspected fraud

Complementary pathways are implemented by a plethora of partners, who support various stages of the individual's journey, including identification, referral and selection of candidates, departure, post-arrival formalities, monitoring and evaluation. In principle, UNHCR will not implement all stages in a complementary pathways programme. Consequently, in this ecosystem of multiple partners, preserving integrity also becomes a shared responsibility.

UNHCR's response to matters of fraud and integrity is guided by the Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons ("the Policy"), and its Administrative Instructions on the Procedures ("Procedures"). The General Policy on Personal Data Protection and Privacy (GDPP) is also relevant. Given that complementary pathways involve shared multi-partner processes, where UNHCR is only one such partner, the organization's engagement in ensuring the integrity of the procedure will differ from that required of activities where UNHCR is involved in all stages of the process.[1]

## A. Preserving systems integrity

For UNHCR, preventing, detecting and responding to fraud committed by forcibly displaced and stateless persons is essential to ensuring that those persons and the international community (including donor, resettlement and host States) continue to have confidence in the integrity of our interventions.

This confidence is critical to safeguarding UNHCR's ability to exercise its international protection and solutions mandate. Therefore, whether UNHCR is actively involved in facilitating a complementary pathway solution or is only requested by other actors to review and verify the accuracy of documentation, status or personal data of a forcibly displaced and stateless person, it has an interest in preserving the systemic integrity of complementary pathways programming and implementation.

As per its mandate, UNHCR plays a key role in preserving the integrity of the entire protection system on the ground and works with partners, governments and service providers alike to ensure its integrity is preserved. To do so, UNHCR may be asked to support various complementary pathways partners with spot checks of applications, review and verification of documentation and status, provided necessary data protection considerations are fully in place. UNHCR may be in the position to verify documents issued by UNHCR itself and share the information on the verification back to the partner, provided two-way data-sharing is established through the relevant agreement in place and consent is provided by the data subjects.

## B. Fraud prevention

Complementary pathways are not UNHCR-led or managed processes. It is recommended that programme designs by partners incorporate mechanisms to deal with suspected fraud. These mechanisms include accessible feedback and response mechanisms, assigning senior personnel as

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**1** From the perspective of the "individual case management continuum" in processes fully owned or controlled by UNHCR, such as reception, registration, refugee status determination (RSD), assistance, and resettlement, we conduct systematic and periodic checks and assessments of data and processes, as per the Policy. UNHCR's approach to integrity risks in complementary pathways differs significantly. Given the involvement of a wide range of actors, resource implications for UNHCR, and the risk of creating bottlenecks, it will not be feasible for UNHCR to perform systematic or periodic integrity checks at each key stage of the process. However, UNHCR remains committed to maintaining key checks and integrity measures within its capacity to ensure the overall integrity of complementary pathways.

## ANNEX 8
## Ensuring integrity
## and responding to suspected fraud

an anti-fraud focal point (AFFP) by partners within their organizations, and regular dissemination of tailored anti-fraud information.

UNHCR has a structured approach to preventing fraud and ensuring the integrity of complementary pathways. UNHCR supports its partners in developing robust anti-fraud measures based on its own organizational experiences, knowledge of the local context and specific policies and toolkits that guide UNHCR's actions and those of partners. UNHCR has an important role in disseminating anti-fraud messaging in general.[2]

Refugees trust messages that come from UNHCR and such messages can help them avoid fraudulent schemes. Notably, anti-fraud messaging in pathways can be quite different from resettlement, Cash-Based Interventions, and other types of assistance and services. For instance, many complementary pathways come with visa fees; therefore, it cannot be said that all services, except for those provided by UNHCR and its funded partners, are free of charge.

Examples of how UNHCR's internal due diligence measures enhance complementary pathways opportunities are:

- **Data collection and management:** UNHCR will ensure data integrity and protection while collecting and managing data relevant to complementary pathways eligibility, such as skills and family composition, to prevent, detect and respond to fraud and ensure the credibility of the programmes;
- **Document issuance:** UNHCR will verify identity and legal status when issuing documents to individuals accessing complementary pathways and issue automatic accreditation letters from the Digital Gateway confirming identity, registration details and biodata of individuals upon their or a partner's request, provided data protection agreements and/or consents are in place;
- **Advocacy:** When UNHCR advocates with host country authorities for exit clearances or documents related to complementary pathways, the above internal measures contribute to maintaining the highest standards of integrity, accountability and transparency and to ensuring that complementary pathways remain trustworthy, secure and aligned with UNHCR's commitment to protecting refugees.

### C. Response to suspected fraud

The Policy and Procedures apply to complementary pathways. As per the Policy, in situations where UNHCR becomes aware of suspected fraud related to partner-managed case(s) that poses a significant risk to UNHCR's interests and/or seriously impacts the protection of forcibly displaced and stateless persons, it must be brought forward to the AFFP at the Operation. The AFFP and the accountable officer for complementary pathways should consult the Regional AFFP and the accountable officer for complementary pathways at the Regional Bureau. The Bureau-level accountable officer for complementary pathways should undertake all correspondence with the project partner, in line with the Policy.

Typically, complementary pathways case support will involve little to no UNHCR direct involvement.

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2  Please see Section 13 (c) of the Procedures for further details on working with partners on fraud prevention, detection, and response.

# ANNEX 8
# Ensuring integrity
# and responding to suspected fraud

However, when suspected fraud is identified by partners or reported by forcibly displaced or stateless persons, UNHCR personnel or any other party, including anonymous sources, referral to the AFFP in an Operation would be required. The AFFP will assess the potential risk to UNHCR Operations, resources or forcibly displaced and stateless persons and initiate investigations (where necessary).

If the individual implicated in suspected fraud remains in the country of asylum and if an investigation is warranted, UNHCR should request the relevant country/stakeholder to put the complementary pathways processing on hold until further notice from UNHCR.

During the investigation, UNHCR will provide the individual with an opportunity to be interviewed by an Investigator (as per the Procedures, para. 8.24), which is also the opportunity to inform the individual of their rights as a data subject, in line with the GDPP (para. 27 and 29-35).

If following the fraud resolution process as stipulated in the Procedures (Section 7), fraud is not established, UNHCR will ask the relevant country/stakeholder to lift the hold and resume complementary pathways processing.

As per Procedures (para. 9.13), suspected fraud involving forcibly displaced and stateless persons, including those in complementary pathways programmes, should be resolved as soon as possible and within six months. The six-month timeline starts from the receipt of an allegation by the AFFP and ends with the initial decision by the Reviewer.

## D. Disclosure of established fraud

If fraud is established, UNHCR should first inform the data subject of its intention to disclose relevant information including personal data with the relevant entity who made the request and allow the data subject to object within a reasonable timeframe (para. 35 GDPP). In case the data subject objects, the responsible Personal Data Controller will need to assess whether UNHCR's interest in disclosing fraud-related information outweighs the privacy rights of the individual. The latter would in general be the case unless processing and disclosing personal data would put the data subject at risk of serious human rights violations.

If no objection was made or if an objection was not accepted by UNHCR (after due process in line with the GDPP, para. 47 and following), UNHCR informs the relevant entity, and the latter will determine further course of action. The AFFP should ensure that all actions are recorded in proGres, physical and/or electronic files.

If the suspected fraud of significant impact to UNHCR and/or the forcibly displaced persons is identified **after** the individual departed, it will be forwarded to the relevant country/stakeholders with an explanation as to the context in which it arose. UNHCR will not initiate an investigation into suspected fraud in these circumstances. However, UNHCR will assist with fact-finding for the relevant country/stakeholder with due regard to its resource capacity.

# ANNEX 8a
## Integrity toolkit

## Prevention and response mechanisms

### Communication and information dissemination

Operations should develop communication materials that clearly outline the key features of current and available programmes, and the interventions provided to persons in need of international protection by UNHCR and partner organizations. As well as addressing the knowledge gaps among refugee communities around complementary pathways, this also supports individuals to differentiate legitimate pathways from illegitimate schemes. UNHCR can also play an important role in information-sharing among different actors for anti-fraud purposes. This includes the sharing of knowledge and expertise around context-specific integrity measures as well as trends around fraud and reporting between partners.

### Capacity building with communities

Messaging should highlight that complementary pathways programmes sometimes require financial obligations and fees. It should also underscore that people in need of international protection should rigorously confirm that programmes are legitimate before making financial commitments to them. Initially, UNHCR should engage with partners, including refugee communities, to assess information and knowledge needs on complementary pathways. It is important to understand how refugees determine whether a pathway is genuine, viable or legitimate—especially in the context where financial requirements are often built into programme design. Refugees have indicated that they tend to trust opportunities more when UNHCR has endorsed or disseminated them. Important tools include establishing focal points and building basic literacy around the differences between resettlement and complementary pathways, increasing knowledge of different partners working on complementary pathways and improving availability of reliable online resources.

### Complaints mechanisms

As UNHCR's roles in complementary pathways are not generally linked to case processing, there are only a few scenarios where UNHCR is required to investigate complaints around complementary pathways. These include:

- conducting registration for the purposes of facilitating complementary pathways, and/or providing further case processing support;
- issuing identity or travel documents to people registered with UNHCR, and who depart on complementary pathways;
- supporting with exit formalities and advocating with authorities on behalf of individuals to procure exit clearance;
- identifying, screening, and/or referring cases for complementary pathways (i.e., conducting case processing activities).

# ANNEX 8a
# Integrity toolkit

### Counselling

Counselling on complementary pathways should reiterate the obligation to provide truthful information to UNHCR and partners and contain information on how and where to report information about possible fraud.

### Standard operating procedures

Each operation should establish SOPs around complementary pathways, which should include an integrity component. SOPs should set out transparent and objective identification criteria, define UNHCR's engagement as well as the procedures and roles of staff supporting refugees to access complementary pathways and complaint mechanisms.

### Risk review and treatment plan

Risks and areas of vulnerability surrounding complementary pathways should be factored into operational risk reviews, conducted in line with the requirements of the Operational Guidelines (see also UNHCR's Risk management tool on Resettlement and Complementary Pathways).

## Safeguards that UNHCR operations can put in place to protect the integrity of complementary pathways

### 1) Communication with communities

Ensure that, in programme design, eligibility criteria are clearly articulated and communicated (on websites, in promotional materials, through community structures and social media, etc.). Confirm that the formulation of eligibility criteria is objective, equitable and considers the principle of non-discrimination.

Invest in awareness-raising among refugee communities on complementary pathways.

Build basic literacy around complementary pathways and other third-country solutions and protection responses, and disseminate information about partners working on complementary pathways.

Develop materials that clearly outline the key features of programmes and support available. Such materials should include explicit information on any financial obligations and fees possibly required for accessing pathways. The need to verify the legitimacy of programmes before making financial commitments must be reiterated through these.

# ANNEX 8a
# Integrity toolkit

## 2) Internal procedures and systems

Have defined procedures and roles for staff responsible for complementary pathways.

Designate complementary pathways focal points in UNHCR and partner organizations to field inquiries from refugees and other partners, and to receive and share information about opportunities.

In accordance with the UNHCR Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons, ensure proper feedback and complaints mechanisms are in place for refugees to access to report fraud and/or to clarify information.

Ensure consistent updates of proGres, physical files and master lists.

Conduct regular fraud risk reviews integrating complementary pathways, considering areas of vulnerabilities in the local context, and make appropriate adjustments to safeguards.

Note trends and make analyses of pathways-related inconsistencies and allegations.

Conduct social media monitoring (within the Complementary Pathways unit and through the external relations team, as well as community-based protection teams) to identify rumours and exploitation schemes. Develop information materials or messaging, in consultation with the people with and for whom UNHCR works and relevant partners, to quickly dispel misinformation.

## 3) Partners and coordination

Hold or attend regular coordination/update meetings between UNHCR and partners working on complementary pathways. Coordination between partners should incorporate technical collaboration. This can include processes where UNHCR verifies case information based on proGres with the objective of identifying, preventing and responding to fraud in registration or documentation procedures.

Engage with partners and provide support on bolstering integrity safeguards. This includes mapping partners and their programmes, systems, and any areas of vulnerability/risk (including collaboratively checking for changes in family composition at each stage of case processing for complementary pathways). UNHCR can also share its own experiences in developing fraud mitigation measures in the operational context.

Optimally utilize existing fraud prevention mechanisms to bolster integrity safeguards (e.g., Biometric Identity Management System).

Encourage embassies and third-country partners to advertise on their websites the partners with whom they work on complementary pathways.

**Draft for Consultation**

# UNHCR Operational Guidance Note

## Complementary Pathways for Admission to Third Countries

## Data recording in proGres

## INTERNAL

## Updated
## December 2024

# Table of contents

## 1. Purpose

This guidance note has been developed to seek consistency and harmonization of data collection by UNHCR regarding complementary pathways activities in proGres. The guidance needs to be read and used in combination with the proGres user guides and materials available in the [proGres page on the PRIMES Support website](#).

## 2. Background

Expanding access to third-country solutions for refugees is one of the core objectives of the **[Global Compact on Refugees](#)** (GCR). With this commitment the global community has set a target of admitting 2.1 million refugees to third countries through complementary pathways by 2030, as outlined in the **[Third Country Solutions for Refugees: Roadmap 2030](#)** (Roadmap 2030). In Roadmap 2030, the lack of comprehensive data on complementary pathways was identified and it was mentioned that collection and analysis of complementary pathways data need to be enhanced. In December 2024, the first UNHCR's Operational Guidelines on Complementary Pathways (CPOG) is launched to provide guidance to UNHCR staff working in areas of complementary pathways, also highlighted the importance of data collection.

UNHCR's ability to record every refugee's movement on a legal pathway to another country is limited.  However, for the purposes of reporting and planning, the operations should strive to ensure that, if and when UNHCR facilitates individual refugees' access and departure on complementary pathways, or information on such independent departures becomes available, such departures and types of UNHCR's facilitation with these (if any) are recorded in proGres.

For further related guidance please refer to the following key sources or refer to Resources (p. 40) in the CPOG.

✓ UNHCR Operational Guidelines on Complementary Pathways (the Guidelines document is available at [the Community of Practice,](#) and [the website version is available here)](#)

✓ [UNHCR Operational Guidance: Facilitating Family Reunification for Persons in Need of International Protection (FROG)](#)

✓ [UNHCR Complementary Pathways Community of Practice (Internal)](#)

✓ [The Three-Year Strategy (2019-2021) on Resettlement and Complementary Pathways](#)

✓ [UNHCR Strategic Directions 2022- 2026](#)

## 3. Recording complementary pathways activities in proGres

### 3.1 Principal guidance

No specific module for complementary pathways exists in proGres. The Resettlement and Complementary Pathways Service (RCPS), in consultation with key operations actively

engaged in complementary pathways, and the PRIMES Support Unit in the Global Data Service (GDS) agreed to utilise existing proGres entities to collect relevant data on complementary pathways assistance/facilitation rendered by UNHCR and refugees' departures.

Operations are hereby requested to develop **Operational Standard Operating Procedures (SOP) on the use of proGres** for complementary pathways in line with the current guidance. The SOPs are to be tailored to the local context, and bear in mind the capacity and level of engagement of UNHCR in complementary pathways related activities in the given operation. The Complementary Pathways team in the RCPS is ready to provide guidance and support in the development of the SOPs.

> **IMPORTANT NOTE:**
>
> 1. Operations should refrain from using the Resettlement Module in proGres to record complementary pathways related activities.
>
> 2. It is not mandatory for operations to make a Data Transfer Request (DTR) when refugees travel through complementary pathways from the country using proGres to third countries using proGres. However, if protection needs are identified in pathway destination countries and individuals' registration records are required for delivery of assistance, the cross-border data transfer should be coordinated between the departing operation and the destination operation.
>
> 3. If family members are travelling to third countries with the complementary pathway principal applicant, it is important to use the Process Change Status to record the departure of all accompanying family members.

## 3.2 Complementary pathways types

Complementary pathways are **migration pathways** with **refugee-specific flexibilities** built in that allow refugees and others in need of international protection to access **work, study** and **other opportunities** outside of their country of asylum, while their **international protection needs** are respected. Complementary pathways can also take the shape of **programmes created specifically** for refugees and others in need of international protection to **access opportunities internationally** outside of UNHCR-assisted resettlement.

> **IMPORTANT NOTE:**
> For the purpose of this guidance and UNHCR's engagement the term "resettlement" will always imply a UNHCR submission (RRF) or a submission from an authorized NGO (Non-UNHCR RST referral) to a government resettlement programme. Every other departure through a pathway of admission to a third country that contains relevant protection safeguards should be considered as complementary pathways.

**TYPES in proGres:**

| # | Type | CPOG/FROG definition | Examples (not exhaustive list) |
|---|------|----------------------|-------------------------------|
| 1 | **Humanitarian Pathways** | Programmes which offer a pathway for admission to individuals in need of international protection through their identification and transfer from the first country of asylum to a third country where they can enjoy effective protection. Eligibility criteria for such programmes are decided by States, sometimes jointly with other actors in the receiving country, and are discretionary. | - US Humanitarian Parole programmes<br>- Italy Humanitarian Corridors Programmes<br>- Humanitarian Admission Programme (HAP) to Germany |
| 2 | **Education Pathways** | Legal channels that permit persons in need of international protection to move to a safe third country for the purposes of higher education, while also having their protection needs met.<br><br>Refugee eligibility for education pathways is assessed based on academic merit and relevant qualifications, provided refugees opt to apply for the opportunities at hand. | - Student Refugee Programme (SRP) of the World University Services of Canada (WUSC)<br>- Japan ICU Foundation Scholarships for Refugees<br>- Scholarships offered by Habesha to Mexico<br>- EU Passworld to Belgium and Ireland<br>- UNICORE for Italy<br>- UNIV'R for France |
| 3 | **Employment Pathways** | Legal channels that permit persons in need of international protection to move to a safe third country for the purposes of employment, while also having their protection needs met.<br>Refugee eligibility for employment pathways is assessed based on professional qualifications and experience, provided refugees opt to apply for the opportunities at hand. | - Australia Skilled Refugee Labour Agreement Pilot<br>- Canada Economic Mobility Pathways Pilot (EMPP)<br>- ReadyForIT - Labour Pathways for Refugees<br>- Displaced Talent for Europe (DT4E) |
| 4 | **Family Reunification** | The legal, rights-based and State-provided avenues that allow refugees to access their right to family life regulated by national, regional and international law. Family reunification procedures include individuals with close and extended family relations based on the concept of dependency which ensures that family members—who may not be close family members but are nevertheless dependents—are able to enjoy the right to family life and family unity. | - Existing legal avenues of each country to enable family reunification or specific programmes i.e.: German Family Assistance Programme (FAP implemented by IOM) |

| 5 | **Sponsorship Pathways** | Programmes in which private individuals, entities or organizations (nomination sponsors) directly engage in admission efforts by identifying, selecting and supporting the entry and stay of nominated individuals in need of international protection. Sponsorship can often include the provision of financial, emotional, social and/or settlement support in a third country (an integration tool which UNHCR refers to as "community sponsorship"). | - Private Sponsorship for Refugees (PSR) Programme of Canada<br><br>- Special Humanitarian Programme (SHP) of Australia<br><br>- Welcome Corps Programme of USA |
|---|---|---|---|

If you have any doubts on how to categorize the pathway in any given case, please contact the **Complementary Pathways and Family Reunification Unit** in the Resettlement and Complementary Pathways Service in DIP.

For further information you can visit the [Complementary Pathway Community of Practice](#) Site in Share Point and contact us through the [Discussion Channels](#) in MS Teams.

## 3.3 Entities for complementary pathways

To date, there are six (6) entities in proGres, under the registration and the assistance modules, that have been adjusted to allow UNHCR to capture specific information related to complementary pathways:

**In the registration module:**

1. **Change Process Status,** when recording departures by inactivating (or closing) a registration record.

> **All operations with proGres are requested to ensure complementary pathways departures** (when information is available) **are adequately recorded** and reflected in the registration module when **changing the individual or group record registration status**.

2. **Referral entity,** when referring the case internally or externally for complementary pathways consideration / action.

3. **Travel Formalities**, when supporting / facilitating access to travel documents and exit permits.

4. **Counselling entity**, when providing advice, conducting an assessment and/or counselling to refugees on complementary pathways including family reunification.

5. **Communication entity** When doing any type of communication with refugees and want to record all details about the communications and what has been discussed.

**In the assistance module:**

6. **Assistance record entity,** when providing different type of assistance to facilitate access to complementary pathways (i.e. cash allowance, transportation ticket to access embassies, translation of documentation, etc)

> Operations must **provide relevant complementary pathways staff with access** to the above-mentioned entities in the Registration Module and the Assistance Module to ensure data recording is conducted effectively and timely.

## 3.4 Access to proGres and security roles

Users log into proGres using the standard login link (https://progres.crm4.dynamics.com/) by using their personal credentials:

- UNHCR user's login via the UNHCR link.

- Partner users (including government) login via the Partner link

The user should get the security roles based on the operation country and the business unit. The user's access rights are managed by Requesting and Approving Officers in an operation, who are responsible for managing user access rights via the Access Management Portal (AMP)".:

UNHCR users should have the below user profiles:

- Registration level 1.
- Assistance level 2.
- Counselling updater.

UNHCR managers should have user profiles in proportion to the needs of the operation.

For more information and details about the existing User Profiles in proGres, you can check out the Security Model & User Profiles Description Guide on the PRIMES Support website.

## 3.5 Use of the six key entities for complementary pathways

In situations where UNHCR is the sole agency responsible for registration, when a confirmation of departure on a complementary pathway is provided by refugees themselves, partners involved in the programmes or departure facilitation, provided data sharing agreements or individual consents are in place, individual cases should be **'Inactivated'** by UNHCR through Change Process Status. This is specifically the case where refugees in question were assisted with acquisition of Refugee Travel Documents (including Convention Travel Documents) and are likely to return to their first country of asylum for renewal of these documents and where UNHCR assistance to facilitate such extension or other support may be required.

The same approach should be advocated with the governments in situations where hybrid registration between UNHCR and government is in place or where government is the sole registering agency. Ideally a data sharing framework between UNHCR and the government in the given location is to include information sharing on the departures for complementary pathways to ensure adequate planning based on real numbers of refugees in the country is possible.

Operations have the option to **close** a registration record when a confirmation of acquisition of a long-duration legal status through the complementary pathway or otherwise is acquired in another country.

Country specific SOPs should be adapted to clearly define the duration of cases remaining inactive before they are changed to **close** status as required by the Registration Baseline SOPs in the given location.

| ⇅ Change Process Status ∨ |
| --- |
| ☑ Activate |
| ⊡ Hold |
| ⊟ Inactivate |
| ⚠ Erroneous |
| ⊠ Close |
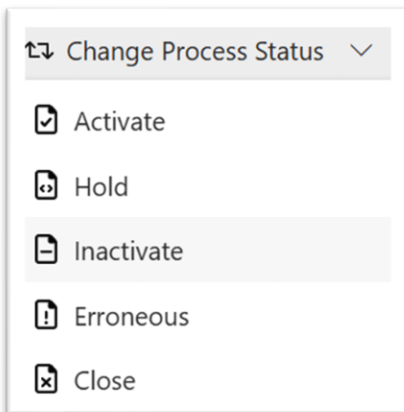
Select "Inactivate" with reports of departures through complementary pathways.

| ⇅ Change Process Status ∨ |
| --- |
| ☑ Activate |
| ⊡ Hold |
| ⊟ Inactivate |
| ⚠ Erroneous |
| ⊠ Close |
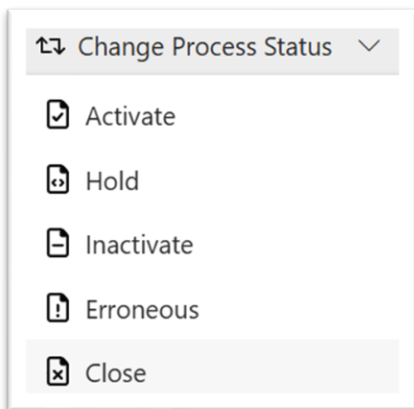
Select "Close" only with confirmed reports of departures from refugees and confirming not returning to country of asylum.

## 3.5.1 Change of Process Status

Record complementary pathways departures (Change of process status reason)

1. The Registration module is found on the left side of the Main Menu.

2. Click **Registration** and once you are in the Registration module, you can find main entities of Reception, Registration Groups and Individuals.

3. After creating the registration group and adding all the individuals with all the required and proper information as mentioned in the user guide of the registration module, you can add the complementary pathways reason of change process status by pressing on Individuals entity:

Registration ∧

Reception

Registration Groups

Individuals
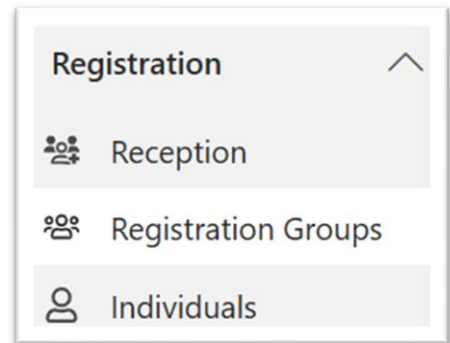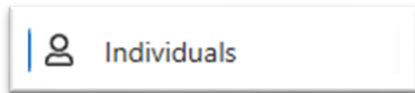
Individuals

4. A new window will open displaying all **individuals** registered under your business unit and security role.

5. Select the required individual and double click on it to open the profile of this individual.

6. Press on **Change Process Status** as the below image.

← | 🗗 Focused view | 🗠 Show Chart | ↰ Change Process Status ∨
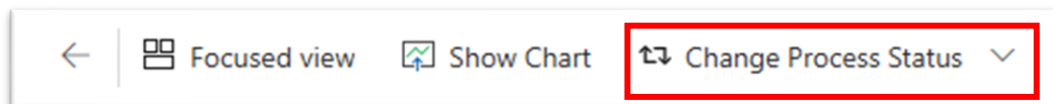
7. You can select from the dropdown list the process status of this individual either Inactivate (or Close), to add the complementary pathways reason.

↰ Change Process Status ∨

☑ Activate

⊡ Hold

▤ Inactivate

⚠ Erroneous

☒ Close
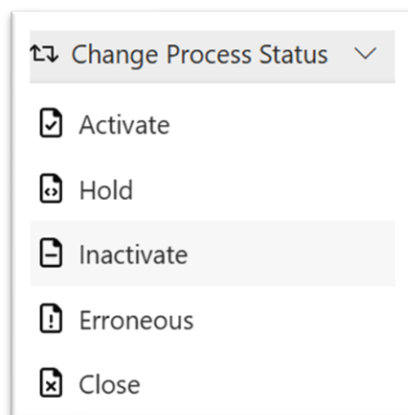
8. A new window will open, add the required information then press on ok to save.

9

## Indicate destination country

Please indicate the destination country in the corresponding pop-up field. Note that the field is mandatory and only visible if the process status change reason is one of the complementary pathways.

➡️  If you have no information on the destination country, please indicate **'Unknown'.**

> For pre-existing records with the process status change reason being one of the complementary pathways values, the Destination Country has been set to 'Unknown'. Operations are encouraged to progressively update these values if /when information is available.

## UNHCR-facilitated process (Yes / No)

Optional to enter yes / no if the process status change has been facilitated by UNHCR, as per country-specific SOPs. For example, to record humanitarian pathways or other complementary pathways facilitated by UNHCR. Some processes are inherently facilitated by UNHCR, such as resettlement, while others cannot be facilitated by UNHCR, such as closure due to death.

This box will help UNHCR understand how many cases are departing on complementary pathways with and without UNHCR or our partners assistance.

## 3.5.2 Counselling entity

This entity can be used by operations in sending and destination countries to record counselling sessions related to complementary pathways, i.e. family reunification counselling. It can also be used to register complementary pathways assessment interviews or any type of exchange done with refugees in the frame of complementary pathways support activities.

Please use the entity as follows to refer to complementary pathways:

| Name | Description |
|---|---|
| **Counselling Type** | Phone, Home Visit or In-person |
| **Counselling category** | **Complementary Pathways** |
| **Sub-Category** | Select the **type of pathway** accordingly |
| **Counselling Date** | Date of the counselling |
| **Regarding** | Leave empty unless is related to any of the options available |
| **Counselling Details** | Free text |
| **Other fields as per User Guide** | |

To create a Counselling record, follow these steps:

1. Click the **Registration** module and select **Individuals.**
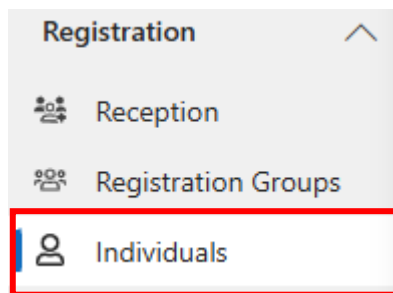


2. Open the desired Individual record by clicking on the Individual ID or the Full Name.

3. Press on **ADD** to open the dropdown list.
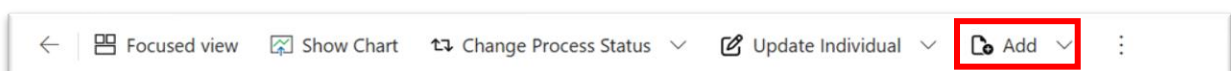
4. Click on **Counselling** from the list.
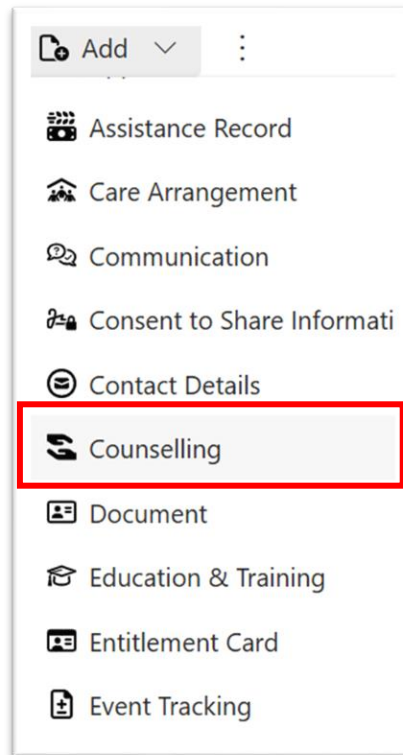


5. Enter the mandatory and required information then Click on Save or Save & Close.

| Name | Description |
|---|---|
| **Counselling Type** | Option set: In-person, Home Visit, Phone. |
| **Counselling Category** | Complementary Pathways |
| **Counselling Sub-Category** | Select the type of pathway accordingly.<br>-Humanitarian Pathways<br>-Education Pathways<br>-Employment Pathways<br>-Family Reunification<br>-Sponsorship Pathways<br>-Other (when none of the above applies). |
| **Counselling By Organization** | Organization of the person who did the Counselling. |
| **Counselling Date** | Date when the Counselling was done. |
| **Regarding** | Select the Related Case Type/Area of Counselling from the list: Registration Group, RSD case, SSD case, Resettlement Case, Child Protection case, and Repatriation case. |
| **Counselling Details** | Free text |
| **Counselling Status** | Current status of the Counselling (Ongoing or Completed). |
| **Process Status** | The Process Status of a Counselling record can have four different values: Active, inactive, Closed or Erroneous. |

**New Counselling** - Unsaved

| General | Counselling Information | External Application Information |
|---|---|---|

| Counselling Type | * | In-person |
|---|---|---|
| Counselling Category | * | Complementary Pathway × |
| Sub-Category | | Family reunification × |
| Counselling By | | --- |
| Counselling By Organization | | --- |
| Counselling By (Other) | | --- |
| Counselling Date | * | --- |
| Language of Counselling Interview | | --- |
| Interpreter Name | | --- |
| Related Case Type/Area of Counselling | | --- |
| Business Owner | | --- |

6. A new counselling record with automated ID will be generated, you can see all the counselling records

### 3.5.3 Referral entity

In addition to the regular use of the referral entity, this entity can be used to record that a refugee is <u>referred</u> to initiate procedures for complementary pathways <u>outside of the context of a UNHCR resettlement submission</u>. The referral entity could also be used to record if UNHCR received a referral for support *vis a vis* a refugee's or NGO partner's actions to initiate admission procedures to third countries without UNHCR's involvement.

**For destination countries** (third countries) this entity could be of relevance for family reunification procedures that are initiated and/or supported at that end.

*Create a referral*

With the existing architecture the "parent record" for a complementary pathway referral will normally be an Individual or a Registration Group, it could also be created from the "child" records i.e. Counselling.

To create a Referral, follow these steps:

1. Click the **registration** module and select **Individuals**.
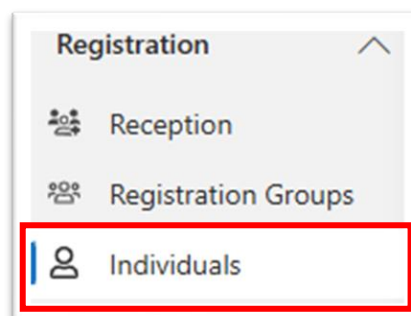
2. Open or select the individual the **Referral** will be created for. It is possible to create multiple Referrals at the same time by selecting multiple individuals.
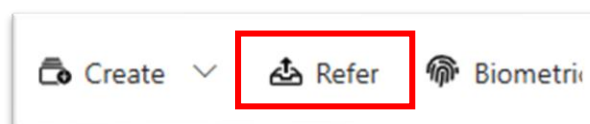
4. Click on **Refer**.

5. A "**New Referral**" form opens. Enter the mandatory and required information.

| Name | Description |
|---|---|
| **Service Type** | **Complementary Pathways** |
| **Service Sub-Type** | Select the **type of pathway** accordingly |
| **Referred to** | ProGres User, Service Unit or Subunit, Non-proGres User |

| If non-proGres user | Indicate the name of the partner working on the Complementary pathways process |
|---|---|



6. Click on Save or Save & Close.

## Complementary pathways process steps in a referral

In operations where case management takes place for complementary pathways, they may want to reflect the different process steps/status that are occurring in a case. Se examples of process steps within the proGres:

For **Humanitarian Pathways** and **Sponsorship Pathways**

| Sept # | Action | Process Status |
|---|---|---|
| 1 | Identification and referral | Pending consideration |
| 2 | Referral acknowledged | Pending visa application |
| 3 | Visa application submitted | Pending visa decision |
| 4 | Visa granted | Pending departure |
| 5 | Departed | Closed |

For **Family Reunification**, **Education Pathways** and **Employment Pathways**

| Sept # | Action | Process Status |
|---|---|---|
| 1 | Identification and referral | Pending consideration |
| 2 | Referral acknowledged | Pending submission for opportunity |
| 3 | 3rd Country Opportunity Offered | Pending visa application |
| 4 | Visa application submitted | Pending visa decision |
| 5 | Visa granted | Pending departure |
| 6 | Departed | Closed |

It is recommended that every time you enter a new process step, you underline press save, so it is registered in a new line.

If you have any questions, please do not hesitate in reaching out to the Complementary Pathways and Family Reunification team in the DIP – RCPS directly by email or through the Discussion Channels in MS Teams. You can also visit the Complementary Pathway Community of Practice Site in Share Point for further information.

3.5.4 Travel Formalities entity

Operations are requested to use this entity within the Registration module, to reflect UNHCR's support facilitating issuance of travel documents and exit permits to access complementary pathways.

Use the travel formalities fields as follows:

| Name | Description |
|---|---|
| **Departure purpose** | **Complementary Pathways** |
| **Sub-category** | Select the **type of pathway** accordingly |
| **Type** | Exit permit or Travel document |
| **Sub-type** | Convention Travel Document (CTD)<br>ICRC Travel Document<br>Other |
| **Request Date** | Date of Request received |
| **Requested By** | Organization making the request |

| Granted | Yes or No |
|---------|-----------|
| Denial Reason | Read only unless Granted is set to NO. Free text field. Please explain reasons for denial. |
| Travel Document Status | Drop down menu: Valid, Collected, Lost, Unknown, Cancelled, Expired, Hold. (If the individual never had a travel document please indicate so in comments). |
| Decision date | Date when document is granted or decision to deny the issuance. |
| Valid until | Validity of the document issued |

*Add Travel formalities record*

To add a record of travel formalities, follow these steps:

1. Click the **registration** and select **individuals**.

2. Click on **Add**.
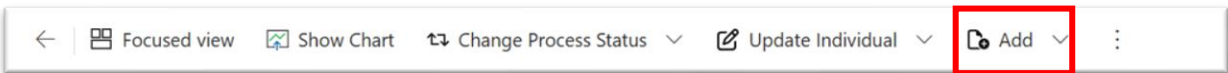


3. Click on **Travel formalities** from the dropdown list.
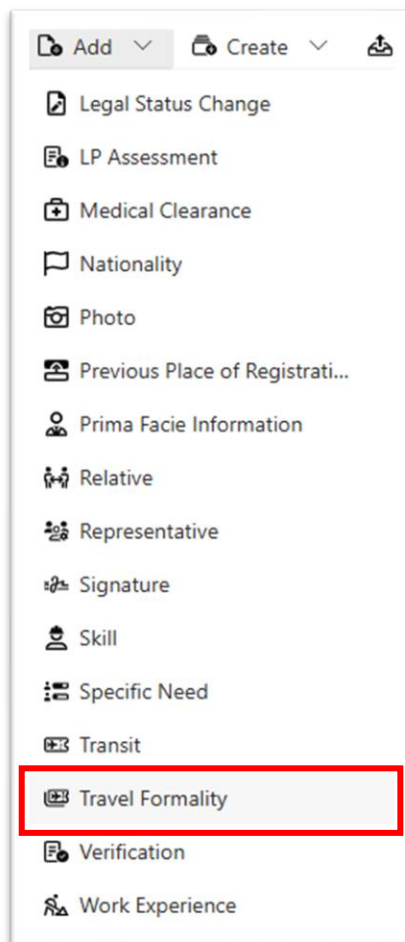


4. A "**New Travel Formalities**" form opens. Enter the mandatory and required information.

## New Travel Formalities - Unsaved

**General**

**Information**

| Field | Value |
|---|---|
| Individual | * 🔒 👤 |
| Departure Purpose | * Complementary Pathways ⌄ |
| Sub-category | Family reunification ⌄ |
| Type | * Exit Permit ⌄ |
| Sub-Type | --- ⌄ |
| Request Date | * --- 📅 |
| Requested By | --- 🔍 |

5. Click on Save or Save & Close.



## 3.5.5 Communication entity

The communication entity should be used by users who need to document that a certain type of communication with an Individual has taken place, and to provide details about the type of communication and what has been discussed.

In proGres, a communication record is created for an Individual. It can then be linked to a specific (and only one) Case of the Individual (e.g., Complementary Pathways) or to his/her Registration Group.
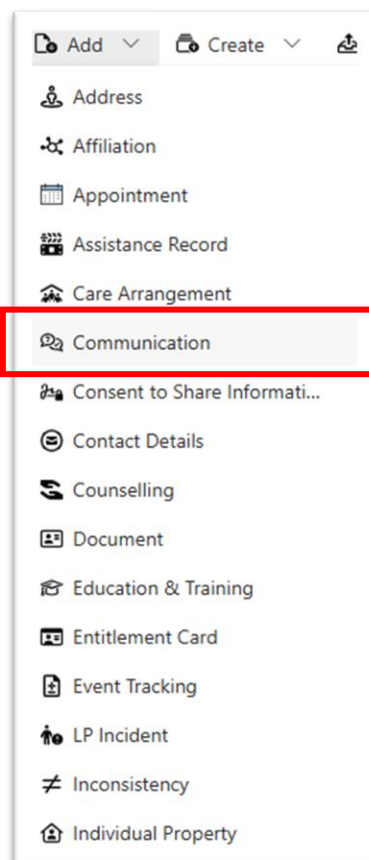
| Name | Description |
|---|---|
| **Communication Description*** | Fill in the subject/ purpose of the communication, e.g. "Enquiry on health assistance" |
| **Category*** | Select appropriate value "Complementary Pathway" from the Look up view |
| **Communication By** | Default to user who create the record |
| **Communication Type** | Select appropriate value from the drop-down menu |

| Follow up By | Select the unit "Complementary Pathway" which should follow up on the communication |
|---|---|
| Follow up By (other) | If applicable, indicate follow-up to be undertaken by agent that is not available in the list above |
| Other category | Indicate other category that the communication may also fall under |
| Communication Details | A summary on the contents of the communication |
| Related Case Type | Select the type of record that the communication is linked to, e.g. Registration Group |
| Regarding | This field appears only if the Related Case Type field is selected. It is possible to create a link to the respective case or group record that the communication is linked to |

*Create a Communication*

To create a Communication record, follow these steps:

1. Click the **Registration** module and select **Individuals**.

2. Select or open the desired individual record. It is also possible to select multiple individual records in order to batch create **Communication** records for each one of them in one go.

3. Click on **Communication** from the list.



4. In the dialog window, enter the mandatory and desired information then click OK.

**Create Communication Records**
You have selected 1 Individuals to create a Communication record.

| | |
|---|---|
| Communication Description* | |
| Category* | Complementary Pathway |
| Communication Sub Category | |
| Communication Date* | 11/21/2024 |
| Communication By | Natsumi Morita |
| Communication Type* | |
| Follow up By | |
| Follow up By (Other) | |
| Other Category | |
| Communication Details | |
| Related Case Type | |

5. The **Communication** record is created and associated to the Individual.

### 3.5.6 Assistance Record Entity

This entity is used when you need to record the delivery of an ad-hoc assistance to an individual or family (registration group). There are many types of assistance that UNHCR provides while facilitating access to complementary pathways (i.e. Documentation, Travel/transport, Legal, etc.).

In line with the regular SOPs for the use of the assistance records entity when entering assistance that is related to complementary pathways please use the following fields as follows:

| Name | Description |
|---|---|
| **Sector** | **Complementary Pathways** |
| **Sub-sector** | Select the **type of pathway** accordingly |
| **Assistance Type** | Select as appropriate. Most relevant assistance types for complementary pathways will be: Documentation, Education, Legal, Livelihoods and Travel/Transport. |
| **Assistance Sub-Type** | Select accordingly. |
| **Other fields as per User Guide** | |

*Create an Assistance record*

To create an Assistance record, follow these steps:

1. Click the **Registration** module and select **Individuals**.

2. Select or open the desired Individual record. It is also possible to select multiple Individual records in order to batch create several assistance records at the same time.

3. Click on **Assistance Record** from the dropdown list of **ADD**.
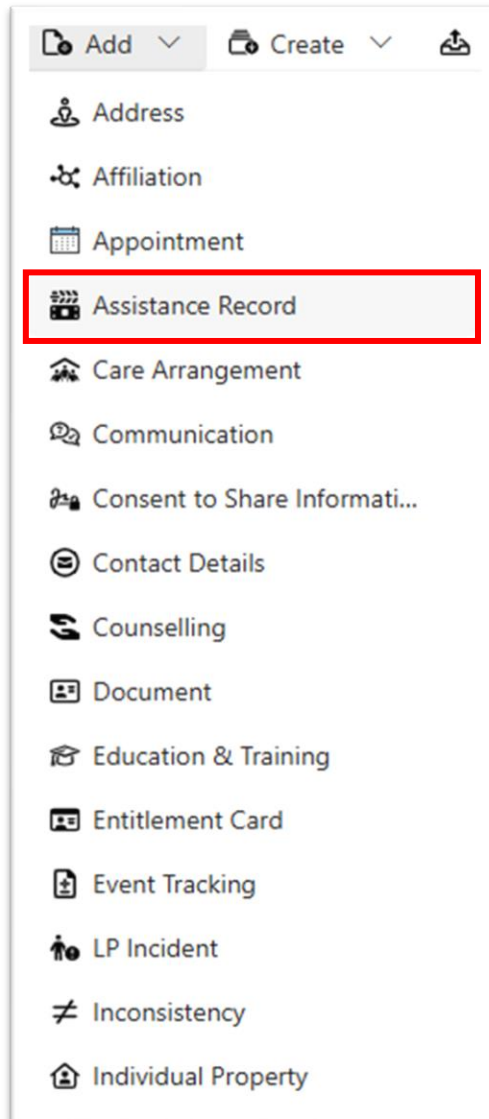


4. A "**New Assistance Record**" form opens. Enter the mandatory and required information.

5. Click on Save or Save & Close.

For more information, you can refer to the user guide of the assistance entity in proGres.

## Annex I – List of all assistance type and subtype

| Assistance Type | Sub-Type |
|---|---|
| Documentation | Birth certificate |
| Documentation | Birth notification |
| Documentation | Certification retrieval |
| Documentation | Convention travel document |
| Documentation | Death certificate |
| Documentation | Divorce certificate |
| Documentation | DNA test fees |
| Documentation | Exit visa |
| Documentation | Marriage certificate |
| Documentation | Other |
| Documentation | Police clearance |
| Documentation | Proof of custody |
| Documentation | Proof of identification |
| Documentation | Translation |
| Education | Accelerated Education |
| Education | Counselling |
| Education | Education grant |
| Education | Education placement exam or academic testing fees |
| Education | Food Assistance |
| Education | Incentives payments |

| | |
|---|---|
| Education | Language exam fees |
| Education | Language training |
| Education | Materials |
| Education | Non-Formal Education |
| Education | Other |
| Education | Scholarship Application |
| Education | Scholarships |
| Education | Training |
| Education | Uniforms |
| Legal | Bail |
| Legal | Counselling |
| Legal | Court fees |
| Legal | Detention release |
| Legal | Family reunification application |
| Legal | Interpretation fees |
| Legal | Legal fees (Other) |
| Legal | Legal representation |
| Legal | Other |
| Legal | Translation fees |
| Legal | Visa application support |
| Livelihoods | Cash Assistance |
| Livelihoods | Counselling |
| Livelihoods | In-kind |
| Livelihoods | Job placement |
| Livelihoods | Other |
| Livelihoods | Training |
| Travel/Transport | Bicycle |
| Travel/Transport | Counselling |
| Travel/Transport | International Travel arrangements |
| Travel/Transport | Local travel allowance |
| Travel/Transport | Local travel arrangements |
| Travel/Transport | Other |
| Travel/Transport | Resettlement departure grant |
| Travel/Transport | Return Grant |
| Travel/Transport | Transportation ticket |
| Travel/Transport | Visa fees |
| Travel/Transport | Voluntary repatriation |

# ANNEX 10a
# Talking points on education pathways

## Key points

- While refugees globally face many challenges, **they first and foremost bring an enormous potential** with their background, experience, skills, qualifications and worldview.

- **They, of course, are in need of international protection**, which limits their access to education and meaningful employment, and often means they lack documents, face financial constraints and other barriers.

- However, refugees bring forward incredible **resilience and desire** to succeed using their skills and capabilities.

- **Complementary pathways open up opportunities** for refugees to use their skills, background, experience and credentials; **to build their futures** through work, study, family reunification in countries other than their first countries of asylum; to be selected based on their skills and aspirations; and to be able to build a future from the education or work opportunity they are qualified for in another country.

- Expanding access to complementary pathways is a tangible way of **responsibility-sharing** to ease the pressure of countries generously hosting large refugee populations. **But it is, first and foremost, a way to enable refugees to take ownership of their lives, to materialize their potential and build their future through their skills and aspiration**s.

- For **refugees**, **higher education** is one such chance to shape a brighter future for themselves and their families. By pursuing an international study opportunity, **refugees gain knowledge and expertise that can help boost their employability**. After graduation, they can use the skills acquired to work and give back to their communities. International study opportunities are essential as many refugees are currently hosted in countries where they have limited opportunities to study.

- For **universities**, bringing in refugees through complementary pathways allows them to attract talented and bright students to their classrooms; enhance the diversity on their campus and build up their rankings. Refugee students bring unique knowledge, experience and skills that can increase diversity across campuses.

- For **employers**, complementary labour mobility pathways allow to bridge employment market gaps and attract talent that brings in resilience, diversity and skills.

- **Many refugees are already succeeding in accessing various types of complementary pathways on their own.** While data remains indicative, almost 2 million individuals, nationals of Syria, Iraq, Iran, Venezuela, Somalia, Eritrea and Afghanistan have acquired first time work, study, family or sponsorship-based permits to enter OECD countries and Brazil in 10 years time (2013-2022). 310,000 of these were for study purposes with 46,000 permits granted in 2022 alone.

- **However, more remains to be done** to ensure refugees have wider access to complementary pathways, including those for the purposes of education. By virtue of being displaced, many refugees face significant challenges qualifying for work or study opportunities abroad, which range from lack of access to education or work experience, to documentation and financial

challenges.

- **Large-scale access to complementary pathways offers a tremendous opportunity to empower refugees in acquiring their own sustainable long-lasting solutions.** It also requires multi-partner effort in amending the admission systems and requirements and building a partner network to open access to such pathways and facilitate refugees' admissions and subsequent integration.

- **UNHCR** works with States and other international actors to expand the number of higher education opportunities for refugees and facilitate access by removing practical, legal and administrative obstacles. UNHCR also works to enable partnerships that provide qualified refugees more opportunities to move to another country for study purposes.

- **Universities and higher academic institutions** are one such partner that plays a catalytic role in expanding refugee access to education complementary pathways through launching of specific pilots, while most importantly advocating with their governments for built in flexibilities for large scale refugee admission for the purposes of education. They can also play a key role by building partnerships with civil society and private sector to ensure integration, long-term solutions and employment upon graduation.

- The Global Task Force on Third Country Education Pathways, UNHCR is an Advisory member of, brings together governments, academic institutions, refugee-led organizations and other key actors to promote and support the expansion of tertiary education as a complementary pathway for refugee students. The Task Force's Community of Practice is a valuable resource for those looking for inspiration, ideas and technical advice for stakeholders interested in expanding education pathways or developing new ones.

- A wider momentum to widen access to third country opportunities through legal pathways generated at the Global Refugee Forum offers many opportunities for universities and academia to join in by supporting the Multi-Stakeholder pledges on skills-based complementary pathways and on Higher Education to make higher education more accessible to displaced students.

## Background information

**Complementary pathways**

**What are complementary pathways?**

Complementary pathways are migration pathways with refugee-specific flexibilities built in that allow refugees and others in need of international protection to access work, study and other opportunities outside of their country of asylum, while their international protection needs are respected. They can also take the shape of programmes created specifically for refugees and others in need of international protection to access opportunities internationally outside of UNHCR-assisted resettlement.

# ANNEX 10a
# Talking points on education pathways

## What are the types of complementary pathways?

Complementary pathways fall broadly into four categories:

- rights-/dependency-based (family reunification);
- qualifications-/skills-based (education pathways and labour mobility);
- needs-based (including evacuations from high-risk areas; short stay arrangements during natural disasters, etc.); and
- sponsorship-based (when extended family members, communities and others in destination countries identify and support visa applications and then offer settlement support)

## What is the value of complementary pathways?

Complementary pathways are a win-win situation.

For **refugees**, access to complementary pathways boosts their self-reliance, and provides them a chance to put their knowledge and skills to use, shape a better future for themselves and give back to their communities. Also, when refugees have access to more opportunities to safely relocate to a third country for work, study or family reunification purposes, they are less likely to resort to dangerous and irregular routes, risking their lives to reach safety.

For **destination countries** (third countries), admitting refugees through complementary pathways can help address skill and labour shortages that many face and create more welcoming societies.

By expanding access to international opportunities, refugees are also less likely to depend on State or international aid. They also often support their first countries of asylum by sending back remittances from the third country. In the case of short-term opportunities, refugees can return to their **countries of first asylum** equipped with new skills and experience and contribute to their communities.

## Education pathways

## What are some examples of education pathway programmes?

University Corridors to Italy (UNICORE): Programme supported by over 30 Italian universities with the support of UNHCR, Italian Ministry of Foreign Affairs and International Cooperation, Caritas Italiana, Diaconia Valdese, Centro Astalli and other partners. It aims to increase opportunities for refugees currently residing in Kenya, Mozambique, Niger, Nigeria, South Africa, Tanzania, Uganda, Zambia and Zimbabwe to continue their higher education in Italy.

University Corridors to France (UNIV'R): Programme providing scholarships to refugee students for Master's degree level studies in French universities.

Philippines Cpaths programme: Universities in the Philippines provide higher education opportunities for Rohingya refugees.

World University Service of Canada (WUSC) student sponsorship programme: In Canada, WUSC identifies refugee students who are in need of resettlement and grants permission to WUSC partner

# ANNEX 10a
# Talking points on education pathways

academic institutions across Canada to sponsor under WUSC's name. Members of the WUSC Local Committees arrange financial and social support for each sponsored student during their first year of study in Canada.

Japanese Initiative for the future of Syrian Refugees (JISR): Through the Japanese Initiative for the Future of Syrian Refugees (JISR), the Japan International Cooperation Agency (JICA) is welcoming applications from Syrians in Lebanon for post graduate studies in Japan.

## Where can refugees find scholarships available to them?

For higher education institutions already offering scholarships, UNHCR maintains the Opportunities site, a scholarship portal aiming to connect aspiring refugee students with study opportunities available to them. UNHCR encourages universities to share their opportunities to the site to reach refugee audiences.

## What is the Global Task Force on Third Country Education Pathways?

The Global Task Force on Third Country Education Pathways promotes and supports the expansion of tertiary education as a complementary pathway for refugee students. Increasing the number of higher education pathways will not only help grow the number of refugees enrolled in higher education to 15% by 2030, as set forth in the Refugee Education 2030: A Strategy for Refugee Inclusion but also pursue the renovated goals of the Third Country Solutions for Refugees: Roadmap 2030 as the next phase of The Three-Year Strategy (2019-2021) on Resettlement and Complementary Pathways.

The Task Force achieves this by:

- Convening relevant stakeholders to advocate for an increase in complementary education pathways programmes globally;

- Coordinating a Global Community of Practice (CoP) on Third Country Education Pathways to share best practices and lessons learned and facilitate collaboration in setting up complementary education pathways;

- Supporting the development of pilot programmes and sustainable funding models;

- Developing tools and resources in collaboration with members of the GTF and CoP to support the design, implementation, and expansion of tertiary education as a complementary pathway for refugees;

- Promoting minimum standards for the design of complementary education pathways and providing assistance and capacity building to ensure new and existing programmes meet these standards.

Global Task Force members include representatives of States, regional and international bodies, the private sector, NGOs, refugee representatives, UN agencies and donors who are engaged in or supporting complementary education pathways and are committed to expanding tertiary education

# ANNEX 10a
# Talking points on education pathways

opportunities as a durable solution for refugee students.

In particular, members of the Task Force are the following: Agence Universitaire de la Francophonie (AUF), European Commission (DG Home), European University Association (EUA), Government of Germany (represented by the German Academic Exchange Service, DAAD), Government of Canada, Government of Italy, Government of Portugal, Dialogo Intercultural Mexicano (DIME), International Catholic Migration Commission Europe (ICMC), Institute of International Education (IIE), Japan ICU Foundation (JICUF), Open Society Foundations (OSF), Open Society University Network (OSUN), Pathways Japan, Refugee Education Special Interest Group (RESIG), UNESCO, UNHCR, UNIMED - Mediterranean Universities Union, World Education Services (WES), World University Service of Canada (WUSC).

Jointly with the Global Task Force on Refugee Labour Mobility, the Task Force led the mobilization of actors for the submission of pledges in support of the multistakeholder pledge on skills-based pathways, in the context of the 2023 Global Refugee Forum.

## Higher education background

According to the latest UNHCR Refugee Education Report, only 7% of refugee youth is enrolled in higher education, compared to almost 40% among non-refugees.

Refugees often face barriers to education (and in particular higher education) due to disruptions in schooling, difficulties accessing education in their country of asylum, lack of documentation, language barriers in their hosting countries, and many other reasons due to their displacement situation.

To increase the number of refugees accessing higher education, UNHCR has developed the Refugee Education 2030 Strategy and set a target of 15% of refugee youth enrolled in tertiary education by 2030. The Strategy is prioritizing work across five pillars of tertiary education (in-country higher education, TVET, digital, DAFI and education pathways) to ensure that refugee students are not left behind, in alignment with the Global Compact on Refugees and SDG 4 (ensure inclusive and equitable quality education and promote lifelong learning opportunities for all).

Education pathways are one of the Strategy pillars; education pathways are programmes, including scholarships, that facilitate movement of persons in need of international protection to a safe third country for the purpose of higher education, while also having their protection needs met.

# ANNEX 10b
# Talking points on labour mobility

## Key points

- While refugees globally face many challenges, they first and foremost bring an enormous potential with their background, experience, skills, qualifications and worldview.

- **They, of course, are in need of international protection, which limits their access to education and meaningful employment**, and often means they lack documents, face financial constraints and other barriers.

- However, refugees bring forward incredible **resilience** and desire to succeed using their skills and capabilities.

- **Complementary pathways open up opportunities** for refugees to use their skills, background, experience and credentials; to build their futures through work, study, family reunification in countries other than their first countries of asylum; to be selected based on their skills and aspirations; and to be able to build a future from the education or work opportunity they are qualified for in another country.

- Expanding access to complementary pathways is a tangible way of **responsibility-sharing** to ease the pressure of countries generously hosting large refugee populations. But it is, first and foremost, **a way to enable refugees to take ownership of their lives, to materialise their potential and build their future through their skills and aspirations**.

- For **employers**, complementary labour mobility pathways allow to bridge employment market gaps and attract talent that brings in resilience, diversity and skills.

- Many refugees are already succeeding in accessing various types of complementary pathways on their own. While data remains indicative, almost **2 million individuals,** nationals of Syria, Iraq, Iran, Venezuela, Somalia, Eritrea and Afghanistan have acquired first time work, study, family or sponsorship-based permits to enter OECD countries and Brazil in 10 years time (2013-2022).

- **Large-scale access to complementary pathways** offers a tremendous opportunity to empower refugees in acquiring their own sustainable long-lasting solutions. It also requires **multi-partner effort** in amending the admission systems and requirements and building a partner network to open access to such pathways and facilitate refugees' admissions and subsequent integration.

- **UNHCR** works with States and other international actors to expand the number of employment opportunities for refugees and facilitate access by removing practical, legal and administrative obstacles. UNHCR also works to enable partnerships that provide qualified refugees more opportunities to move to another country for employment purposes.

- Employers are one such partner that **plays a catalytic role in expanding refugee access** to labour mobility through launching of specific pilots, while most importantly advocating with their governments for built in flexibilities for large scale refugee admission for the purposes of employment. They can also play a key role by building partnerships with civil society and private sector to ensure integration and long-term solutions.

# ANNEX 10b
# Talking points on labour mobility

## Background information

### What are some examples of labour pathways?

- The Skilled Refugee Labour Agreement Pilot provides an opportunity for refugees and displaced individuals with specific skills to contribute to the country's economy while rebuilding their lives in a safe and supportive environment. This programme aims to address Australia's skilled labour shortages by matching qualified refugees with job opportunities in sectors such as health care, construction, agriculture, and technology. Eligible candidates are assessed based on their skills, experience, and ability to integrate into the Australian workforce. The pathway typically includes visa support, resettlement assistance and access to training programmes to help participants adapt to local workplace standards.

- The Canadian Economic Mobility Pathways Pilot (EMPP) is an innovative programme designed to help skilled refugees and displaced individuals access economic immigration pathways, combining Canada's humanitarian and labour market goals. This pilot recognizes the valuable skills and qualifications refugees bring, enabling them to contribute meaningfully to Canada's economy while rebuilding their lives. The EMPP facilitates the immigration process by waiving certain fees, providing flexibility in documentation requirements and offering support services to applicants. It connects refugees with opportunities in industries experiencing labour shortages, such as health care, trades, and technology.

- The Displaced talent for Europe (DT4E) programme focuses on bridging the gap between displaced talent and the needs of European employers, addressing both humanitarian and economic goals. The programme helps refugees access meaningful employment opportunities by connecting them with companies seeking skilled workers, particularly in sectors facing labour shortages. Through this programme, skilled refugees in Jordan and Lebanon were able to connect with employers in Belgium, Ireland, Portugal and the United Kingdom with the programme expanding further into France and Slovakia. Through tailored training, job placement services, and partnerships with businesses, DT4E supports both the professional development of refugees and the economic growth of participating countries. The Displaced Talent for Europe programme works to streamline legal pathways for displaced individuals to enter the workforce, overcoming barriers such as limited access to work permits and recognition of qualifications. By collaborating with governments, NGOs, and private sector organizations, DT4E creates a supportive framework for refugees to contribute to the European economy while rebuilding their lives.

- The Italian government has pledged to open up labour migration to refugees and launched in 2024 a programme, first of its kind, whereby refugees are specifically included in the labour migration framework through a dedicated channel of training-to-hire framework. The framework engages locally (in first countries of asylum) available Italian MoL accredited training institutions to support individual refugees, pre-selected for employment opportunities in Italy in IT, jewellery-making, ship-making sectors to undergo necessary training and certification to be followed by relocation to Italy for employment purposes. The project is currently training refugees in Uganda, Egypt and Jordan. Negotiations are ongoing to expand into other countries in Africa and Latin America.

# ANNEX 10b
# Talking points on labour mobility

**What is the Global Task Force on Labour Mobility?**

The mission of the Task Force is to engage with stakeholders around the world to expand refugee access to third-country solutions through labour complementary pathways. The Task Force achieves this through:

- discussion with stakeholders who support these initiatives;

- technical advice and support to:

    - help new initiatives take root and grow
    - identify ways to improve and scale up existing programmes

The Task Force currently prioritizes scaling refugee labour mobility, through sharing learning, innovation, and coordinating efficiencies, while encouraging further refugee labour mobility initiatives. One of the vehicles for driving scale is through reinvigorating and expanding the Global Refugee Labour Mobility Network, a place to share knowledge, best practices and discuss solutions to challenges.

Members of the Task Force include the Australian Government (current chair), the Government of Canada, UNHCR, IOM, Talent Beyond Boundaries, RefugePoint, International Chamber of Commerce, and Fragomen.

Jointly with the Global Task Force on Third Country Education Pathways, the Task Force led the mobilization of actors for the submission of pledges in support of the multistakeholder pledge on skills-based pathways, in the context of the 2023 Global Refugee Forum.

# ANNEX 10c
# Talking points on family reunification

## Key points

- **Family unity is a universal human right** established under international and regional human rights law.

- Respect for the right to family life and the principle of family unity requires States not only to **refrain from conduct that would result in family separation** but also to **take measures maintaining family unity and to reunify separated families**.

- As a rights-based pathway family reunification is **non-discretionary and States bear the main responsibility to ensure the right to family unity is effectively protected**.

- States should adopt **a broad and flexible approach to the term "family"** based on the principle of dependency and determined on a case-by-case basis, requiring an open, flexible approach and broad interpretation, considering biological and social connections, cultural variations as well as physical, emotional and economic ties or dependency factors.

- Where family members—who may not be close by relationship type but are nevertheless dependant—cannot reunite through State-managed family reunification procedures, States are encouraged **to develop complementary programmes to allow reunification for extended family**; this may include the development of sponsorship pathways.

- Well-designed refugee family reunification procedures can help establish safe and legal routes that can prevent refugees from resorting to dangerous and irregular journeys. Ensuring regular pathways for safe, orderly and regular migration, including family reunification, are accessible and viable, is a pillar of the **UNHCR Route Based Approach**.

- Indicative data suggest that family reunification **remains the most relied upon third country solution** (joint UNHCR-OECD Safe Pathways for Refugees report).

- There is reason to believe that **the needs for family reunification are much greater than the number successfully reuniting**, although data on numbers of separated families is currently not comprehensive.

- All countries **have a responsibility to facilitate entry and exit for the purposes of family reunification**:

    - Refugees and other beneficiaries of international protection should benefit from a more favourable family reunification regime than other foreigners.

    - The principle of non-discrimination requires that beneficiaries of international protection should have **equal access to family reunification** as refugees.

    - Applications for family reunification should be processed in a **positive, humane and expeditious** manner and with the least possible delay.

    - Any relevant **exit formalities should be waived or expedited** to enable departures.

# ANNEX 10c
# Talking points on family reunification

- **UNHCR** works with States and other international actors to remove or overcome practical, legal and administrative obstacles to ensure family reunification procedures are effective and accessible for refugees. This requires policy adjustments and a coordinated whole-of-society approach to building systems of support for individual families.

- UNHCR is a founding member of the Global Family Reunification Network (FRUN) and a member of the FRUN Advisory Group, and supports the States-only FRUN subgroup. The FRUN draws together key stakeholders, experts and academics in the realm of family reunification with the collective purpose of promoting and facilitating greater access to family reunification procedures.

- The Multistakeholder Pledge on Supporting Refugee Family Reunification at the 2023 Global Refugee Forum marked an important leap in momentum in support of refugee family reunification. The pledge unified diverse stakeholders behind the overarching pledge goal to help at least 1 million refugees reunite with their families by 2030. Moreover, work towards pledge implementation is already improving stakeholder mobilization and coordination in multiple locations.

## Background information

### What is family reunification?

Family reunification is the process of reuniting family members who have been involuntarily separated through displacement.

States have the responsibility to ensure that all families are together and establish family reunification procedures that enable separated families to reunite. Family reunification procedures include individuals with close and extended family relations in line with the principle of dependency which ensures that family members—who may not be close family members but are nevertheless dependants—are able to enjoy the right to family life and family unity.

Almost every country in the world has a system in place to help reunite separated families and most have dedicated or adapted legal framework for refugee families. Refugee families should be able to access those systems with the necessary safeguards in place, considering their protection needs.

### Why do we say that family reunification is rights-based?

Family unity is a human right, enshrined in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights, among other international, regional and national legal instruments. The 1951 Convention and its 1967 Protocol oblige State parties to provide protection to refugees, assuring the widest possible exercise of their fundamental rights and freedoms without discrimination.

Ensuring the right to family life and the principle of family unity requires States not only to refrain from conduct that would result in family separation, but also to take measures maintaining family unity and,

# ANNEX 10c
# Talking points on family reunification

where needed, allowing family life and family unity to be restored, i.e. the reunification of separated families. Refusal to maintain or restore family unity and reunite families may be considered interference with the right to family life (in situations where a family's most realistic possibility for enjoying family life is in a specific country, as is the case for refugees and other beneficiaries of international protection). Refugees and other beneficiaries of international protection should benefit from a more favourable family reunification regime than other foreigners.

## What are some of the obstacles keeping refugee families apart?

There is reason to believe that the needs for family reunification are much greater than the number successfully reuniting, although data on numbers of separated families is currently not comprehensive. Several practical, legal, and financial barriers often make family reunification procedures inaccessible for refugee families. These include:

- Complex procedures and lack of access to reliable information in the refugees' first language;
- Financial barriers including high fees and strict income requirements;
- Short deadlines and long waiting periods;
- Cultural differences in the definition of family that often exclude members who may also be socially, emotionally, and/or economically dependant;
- Documentation challenges including difficulties in accessing evidence and proof of identity or relationships (passports, birth or marriage certificates, etc.);
- Limited embassy presence that forces family members to embark on dangerous journeys to neighbouring countries or regions for different stages of their application process;
- Protection challenges: Often family members are refugees themselves. This means that when requested to approach the authorities of their country of origin to obtain documents, those families may be exposed to further risk of harm.

## What needs to change for refugee families to have better access to family reunification?

UNHCR advocates for all States to ensure that family reunification procedures are prompt, effective and flexible to allow refugees and their families to apply for reunification with their protection needs safeguarded. This includes:

- Cooperation with diplomatic representations of other States, international organizations and external service providers;
- Adopting flexible procedures for receiving and processing visa applications;
- Adopting a flexible approach in the proof of identity, marital status and family relationships;
- Acceptance of travel documents;
- Refraining from referring refugees or their family members to the authorities of their country of origin or habitual residence for obtaining documentation.

# ANNEX 10c
# Talking points on family reunification

## What is UNHCR's role in refugee family reunification?

Family reunification procedures remain first and foremost the responsibility of States. As the agency mandated with refugee protection UNHCR has a role to play in safeguarding refugees' fundamental right to family unity and enhancing refugee access to family reunification procedures.

UNHCR's engagement in family reunification in both departure and receiving countries is structured around five pillars:
- gathering evidence;
- advocacy for systems change;
- policy and knowledge building;
- working with and coordinating partners; and
- exceptional direct case work/support.

UNHCR is also a founding member of the Global Family Reunification Network (FRUN) and a member of the FRUN Advisory Group, and supports the States-only FRUN subgroup.

## What are the other key actors in the space of family reunification?

Family reunification procedures are the responsibility of States who need to ensure that they are fast, flexible and accessible for refugee families.

In reality, helping refugees attain their right to family life requires a whole-of-society approach. Other key stakeholders in this space include:

- Refugee-led organizations and diaspora groups who can support with information dissemination;
- Private law firms who can support by committing hours to representing refugee families, assisting with applications, performing strategic litigation, and providing services on both pro bono and commercial basis;
- Civil society organizations and legal support providers who can provide assistance and counselling;
- International organizations like IOM that can support with migration facilitation and the Red Cross who can support with family tracing;
- (Other) private sector entities can assist by promoting positive publicity around family reunification, funding direct service providers, providing free services (such as flights), or by hiring refugees to help them meet minimum income requirements.

For a more comprehensive list of key actors and their roles, please consult the UNHCR Operational Guidelines on Facilitating Family Reunification for Persons in Need of International Protection.

## What is the Global Family Reunification Network?

The Global Family Reunification Network (FRUN) is the first global platform devoted to family reunification for refugees and other beneficiaries of international protection. Launched in December 2020, the FRUN draws together key stakeholders, experts and academics in the realm of family reunification with the collective purpose of promoting and facilitating greater access to family

# ANNEX 10c
# Talking points on family reunification

reunification procedures.

Jointly, the FRUN Advisory Group and nominated pledge leadership bodies, led the mobilization of actors for the submission of pledges in support of the Multistakeholder Pledge on Supporting Refugee Family Reunification, setting an objective of **1 million refugees reunited with their families by 2030**.

## What are the examples of best practices in the space of refugee family reunification?

- **Broader definition of family** – many States restrict eligibility for family reunification to the immediate/nuclear family, typically defined as spouse and minor children, without due considerations of cultural interpretations or dependency factors. Others take a much broader approach; Brazil, for example, allows family members up to the fourth degree of consanguinity to apply for family reunification. Other States also are more flexible in their definition of family, in particular towards young adult children, in the US for example.
- **Documentation to establish family relationship** – France, the UK and Canada are amongst States that apply a pragmatic approach towards documentation, considering alternative forms of evidence to establish relationships.
- **Flexible processing** – in-person processing requirements can present a significant hurdle for family members where embassy access is restricted. Some States employ a flexible approach to case processing including through remote interviews, such as adopted by the Netherlands.
- **Financial waivers and post arrival assistance** – New Zealand waives application fees and funds medical assessments and flights for refugee families, in addition to providing community orientation and integration support through partners. Other States likewise include families in their refugee resettlement post-arrival support programmes.

# ANNEX 10d
# Talking points on sponsorship pathways

## Key Points

- Sponsorship pathways (sometimes referred to as private or named sponsorship) refers to programmes in which private individuals, entities or organizations directly engage in admission efforts by identifying, selecting and supporting the entry and stay of nominated individuals in need of international protection.

- Sponsorship programmes are **an expression of community support for solutions and responsibility-sharing**.

- Sponsorship pathways **engage a broad range of actors** across communities and are an **important tool for family reunification** since sponsored individuals often include nuclear and/or extended family members of the sponsors.

- Such programmes allow for individuals to sponsor refugees they identify for admission to countries and include the provision of reception and settlement support for refugees after their arrival in a third country**, enhancing integration and self-reliance** prospects and strengthening communities narratives.

- Sponsorship programmes present important opportunities to increase access to third-country solutions by leveraging public support for refugees. **Sponsorship programmes must be additional to resettlement.** Sponsorship pathways, should lead to an overall net increase in the number of people accessing third-country solutions without jeopardizing or replacing resettlement quotas that offer solutions based on specific protection needs.

- **States may avoid a sponsorship programme undermining resettlement** by ensuring refugee populations and individuals in need of solutions, as identified by UNHCR and including those in protracted situations, are eligible for sponsorship opportunities.

- **When devising new sponsorship pathway programmes**, States are encouraged to undertake thorough contextual assessment of relevant procedures in the countries of current asylum for the sponsored refugees. They are also encouraged to consider all risks associated with opening up sponsorship programmes, ranging from potential fraud to large influxes of refugees arriving on the promise of sponsorship.

- Sponsorship programmes **should not diminish State responsibility for protection** and should be underpinned by a safety net of government support and rights consistent with international protection standards and harmonized with that provided to refugees resettled through government programmes. While sponsors have important responsibilities, States bear ultimate responsibility for the protection and integration of refugees.

- **UNHCR** works with States and other international actors to expand the opportunities for sponsorship and supports the design of sponsorship programmes with adequate protection safeguards, transparent selection processes and effective monitoring systems. On the departure country's side, UNHCR also negotiates with States to ensure smooth departure, including through issuance of travel documentation and exit permits.

- UNHCR also provides technical and strategic advice as a Core Group and Advisory Group member of the Global Refugee Sponsorship Initiative (GRSI). The GRSI webpage is a valuable resource for those looking for inspiration, ideas and technical guidance, including states and potential sponsors.

- The momentum to widen access to third country opportunities through legal pathways generated at the Global Refugee Forum offered an opportunity for States, civil society groups and the private sector to support the Multistakeholder Pledge: Sponsorship by pledging activities to enhance and expand opportunities for sponsorship.

## Background Information

### What are sponsorship pathways?

**Sponsorship pathways** (sometimes referred to as private or named sponsorship) refer to programmes in which private individuals, entities or organizations (nomination sponsors) directly engage in admission efforts by identifying, selecting and supporting the entry and stay of nominated individuals in need of international protection. Sponsorship can often include the provision of financial, emotional, social and/or settlement support in a third country (an integration tool which UNHCR refers to as "community sponsorship").

Sponsors are the ones identifying, selecting and supporting the entry and stay of people in need of international protection. State authorities manage the visa process and work with sponsors to ensure the well-being of refugees and that their post-arrival needs are met. Even though sponsors lead the process, it is the State that retains the ultimate responsibility over the admission decisions as well as the protection of refugees, including by ensuring that they have access to rights and services upon arrival and their sponsors are vetted and trained in line with pre-established criteria.

While the programmes are normally open for sponsors to choose who to support, family reunification is a significant feature of these pathways. As individuals, who benefit from these programmes are nominated by the receiving individuals, groups or organizations, they often include nuclear and/or extended family members of the sponsors.

### What is the difference between sponsorship pathways and community sponsorship?

**Community sponsorship** is a reception and integration tool that involves the pairing of resettled refugees or persons admitted under complementary pathways with individuals, groups of individuals or organizations (i.e. sponsors such as local clubs, businesses, university communities, faith groups, etc.). These entities commit to providing clearly defined financial and/or in-kind contributions, emotional support and volunteer services to help refugees or other persons in need of international protection upon arrival. Community sponsorship programmes are not a complementary pathway.

**Sponsorship pathways** are a third-country solution that should lead to an overall net increase in the number of persons in need of international protection admitted to receiving countries. Scenarios where communities identify beneficiaries and/or facilitate admission are sponsorship pathways. Such pathways, are likely to be accompanied by the expectation that sponsors will take on settlement

support upon arrival.

## Are sponsorship pathways a complementary pathway?

Sponsorship pathways are included in what is known as "third-country solutions" i.e. safe and regulated avenues that provide recognized refugees and other persons in need of international protection with lawful stay in a country other than the country of origin or first host country. This includes resettlement and complementary pathways.

Complementary pathways fall broadly into four categories:

- **rights-/dependency-based** (travel for family reunification of immediate or extended family members based on a right to family life and the principle of family unity);
- **qualifications-/skills-based** (travel for work or study, or for sport and the arts, academic research, and other pursuits);
- **needs-based** (including evacuations from high-risk areas; short stay arrangements during natural disasters, etc.); and
- **sponsorship-based** (when extended family members, communities and others in destination countries identify and support visa applications and then offer settlement support).

By definition, complementary pathways are accessible on the basis of skills and experience, family and community links and other factors. In contrast, resettlement offers a solution in another country to those with acute protection needs that cannot be addressed in their countries of asylum.

## What is UNHCR's role in sponsorship pathways?

UNHCR's main role in sponsorship pathways is to advocate for programmes to contain adequate protection safeguards, transparent selection processes, effective monitoring systems and complementarity to resettlement quotas. On the departure country's side, UNHCR also negotiates with States to ensure smooth departure, including through issuance of travel documentation and exit permits. In some contexts, UNHCR works with states on measures to support programme integrity, including by verifying documentation and information where the necessary agreements and data protection policies allow.

## What is the Global Refugee Sponsorship Initiative?

The Global Refugee Sponsorship Initiative (GRSI) was launched in December 2016, working with civil society organizations and states to encourage and support the adoption and expansion of community sponsorship programmes around the world. The GRSI is mentioned and therefore grounded in the Global Compact on Refugees (GCR). The GRSI promotes sponsorship as a pathway and as an integration tool (community sponsorship).

In partnership with local community leaders and government policymakers, the GRSI aims to:

- Increase refugee resettlement opportunities and improve refugee integration outcomes by engaging governments, community groups, individuals, philanthropists, and businesses in resettlement efforts;
- Strengthen local host communities that come together to welcome newcomers; and

# ANNEX 10d
# Talking points on sponsorship pathways

- Promote welcoming and inclusive societies and improve the narrative about refugees and other newcomers.

The **Core Group of the GRSI** is the decision-making body, setting the strategic and operational direction for the GRSI and developing and implementing the GRSI workplan. Its current members are the Government of Canada (through the IRCC), the Open Society Foundation (OSF), the Giustra Foundation, the Shapiro Foundation, Pathways International, Robert Bosch Stiftung Foundation, Porticus and UNHCR.

The GRSI Advisory Group provides strategic advice to GRSI Core Group members. Current members are the Government of Canada (through the IRCC), UNHCR, The Refugee Hub, OSF, Giustra Foundation, Shapiro Foundation; Co-Chair of GRSI Global States Network (UK Home Office); Co-Chair of GRSI Global CSO Network – Amnesty International. Jointly, the GRSI, led the mobilization of actors for the submission of pledges in support of the Multistakeholder Pledge: Sponsorship at the 2023 GRF.

**The 2023 GRF Multistakeholder Pledge**

At the 2023 Global Refugee Forum, the GRSI mobilised actors in support of the Multistakeholder Pledge: Sponsorship, aiming to expand sponsorship for refugees worldwide (including sponsorship pathways and community sponsorship), by expanding existing programmes by making them more accessible and empowering potential sponsors, establishing new programmes and engaging more actors.

The Global Sponsorship Fund, which was part of the sponsorship multi-stakeholder pledge, is a novel global financial initiative intended to render sponsorship possible in places where communities are willing, but funds are in short supply. The Robert Bosch Stiftung and the Government of Italy were the first donors to the Fund, pledging 500,000 euro each to the launch.

**Examples of sponsorship pathways**

- Private Sponsorship for Refugees (PSR) Programme of Canada;
- Special Humanitarian Programme (SHP) of Australia;
- Welcome Corps Programme (naming track) of USA;
- Brazil (2023 GRF pledge - call for sponsor group applications).

Some sponsorship programmes have specifically been designed and implemented to support family reunification:
- Syrian Humanitarian Admission Programme (SHAP) of Ireland (closed in April 2014)
- Irish Refugee Protection Programme Humanitarian Admission Programme 2 (IHAP) (closed in February 2019