



Multi-Country Strategic Evaluation of UNHCR's Operations in Northern Europe (Nordic and Baltic Countries)

EVALUATION REPORT

JUNE 2022

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UNHCR Evaluation Service

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Evaluation information at a glance	
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List of abbreviations

AAP	Accountability to Affected Populations
AGD	Age, Gender and Diversity
AGDM	Age, Gender and Diversity Mainstreaming
APR	Annual Programme Review
BTP	Business Transformation Programme
CEAS	Common European Asylum System
CO	Country Office
CoE	Council of Europe
COP	Country Operations Plan
EASO	European Asylum Support Office (Now EU Asylum Agency)
ECRE	European Council on Refugees and Exiles
EEA	European Economic Area
EU	European Union
EURODAC	European Dactyloscopy
GBV	Gender-Based Violence
GCR	Global Compact in Refugees
GRF	Global Refugee Forum
HQ	Headquarters
IDPs	Internally Displaced Persons
IOM	International Organization for Migration
KI	Key Informants
KII	Key Informant Interviews
MCO	Multi-Country Office
MYMP	Multi-Year Multi Partner Planning
OECD/DAC	Organization for Economic Co-operation and Development Assistance Committee
OL	Operational level
POC	Persons of Concern
RBE	Regional Bureau for Europe
RBM	Results-Based Management
RNB	Representation for the Nordic and Baltic Countries
RO	Regional Office
SDGs	Sustainable Development Goals
ToC	Theory of Change
UNEG	United Nations Evaluations Group
UNHCR	United Nations High Commissioner for Refugees
WoS	Whole-of-Society

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Executive Summary

Evaluation Objectives and Approach

In 2021, UNHCR's Evaluation Service commissioned an **external strategic evaluation of UNHCR's Operations in Northern Europe** (Nordic and Baltic countries) following a request by the Regional Bureau for Europe (RBE). An independent assessment and review of the activities of UNHCR were deemed necessary to reflect on a number of ongoing developments, both internally within the Organization and externally in the protection environment in the Nordics and Baltics. This evaluation therefore presented an opportunity to take stock of UNHCR's operations in the Nordic and Baltic countries, to identify the first results of ongoing change processes and to reflect on UNHCR's contribution to enhance international protection for persons of concern (POC) in this region. The evaluation was conducted by a team of three external consultants in the period June-December 2021.

The **main purpose** of the evaluation was to present timely evidence to inform UNHCR's future operational planning and strategy in the region covered by the UNHCR Regional Representation for Northern Europe – later renamed the UNHCR Representation for the Nordic and Baltic countries in 2020 - leading to more effective and impactful UNHCR partnerships and programming, in pursuit of protection and solutions for UNHCR persons of concern and communities that host them. In addition, the evaluation sought to analyse and assess the effectiveness of UNHCR's plans and activities in light of the evolving needs of the population, political and policy trends at the government level and the work of UNHCR's partners and other key civil society stakeholders.

The **four evaluation questions** were as follows:

1. Did the RNB identify and prioritize the most relevant issues to strengthening the protection environment and supporting solutions in the countries that fall within the sub-region?
2. How fit-for-purpose is the current RNB's operational structure and resources to deliver its priorities?
3. To what extent has the RNB sufficiently leveraged partnerships with relevant stakeholders, including civil society organizations, to advocate for and support refugee protection and solutions?
4. At this stage, what lessons can be learned from the RNB regarding the implementation of its global and local priorities in high-income country contexts where UNHCR provides less/no direct support to POC?

The evaluation followed a mixed methods approach combining in-depth desk review (164 documents, including 149 internal and 15 external), as well as content analysis based on internal and external perceptions and opinions of UNHCR's work in the Nordics and Baltics. The evaluation team conducted 32 remote key informant interviews mainly with current and former RNB, RBE and HQ staff, and 40 remote interviews with external interlocutors in Sweden, Norway, Lithuania and other locations (e.g. Switzerland, Belgium, Malta) ranging from governmental entities, non-governmental organizations, UN agencies, EU institutions, academia and think tanks. In addition, the evaluation team received 15 responses from internal staff to an online survey and 32 responses from external interlocutors. In addition, three out of the eight countries were selected as case-studies to enable the understanding of how programming works and how different elements work together in practice, namely [Sweden](#), [Norway](#) and [Lithuania](#).

Contextual Changes and limitations

During the course of the conduct of the evaluation, significant contextual developments occurred within the region. Two key factors namely, the emergence of COVID-19 and the emergency-like conditions on the border of Belarus affected the conduct of the evaluation. COVID-19 impacted the evaluation by limiting opportunities for in person travel to the region and directing significant attention

of key interlocutors onto the effects of changed patterns of remote working and the atypical nature of remote interaction between UNHCR and its stakeholders. Similarly, respondents and key evaluation stakeholders' perspectives of UNHCR were shaped by the situation on the Belarus border, which while somewhat considered by the evaluation team, was not within the original evaluation objective.

These changes were, however, overshadowed by the large-scale displacement of Ukrainians and other nationalities resident in Ukraine (internal and cross border) following Russian military activities in Ukraine in February 2022. Data gathering and analysis for this report was completed prior to the Ukrainian situation and could not take into account the plethora of policy changes in Europe nor the effects on UNHCR operations or, most importantly, on UNHCR persons of concern. Readers of the report should therefore be cognizant that the findings and analysis that follow in the report were produced prior to the Ukraine conflict and subsequent displacement. Nevertheless, it is hoped that the conclusions and recommendations that follow will support and streamline UNHCR's work in the Nordic and Baltic countries by addressing gaps and structural challenges

Evaluation Findings

On [prioritization of protection and solutions work](#): the evaluation observed that:

1. In its desire to ensure that the high legal protection standards that the Nordic region is known for are maintained, the RNB has continued to organize and deliver its work on protection using relatively traditional approaches (i.e., a heavy focus on commentaries on the normative legal framework for litigation on asylum cases and commentaries on the normative legal frameworks, as well as advocacy on resettlement). The evaluation team, while noting that this work is key to UNHCR's normative role observed that the RNB could have found opportunities to move beyond "doing business as usual" and been more creative in delivering its protection mandate. The RNB has however, been more innovative in the area of solutions by venturing into the "uncharted territory" of complementary pathways, following its recognition of a political opportunity in a number of countries to do so.
2. While the strategic planning approach facilitated by participating in the early piloting of the Multi-Year Multi Partners (MYMP) 2017- 2021 has been assessed as helpful, it has not had a far-reaching impact on guiding the prioritization of the RNB in the period that the evaluation covered. It is therefore too early to appreciate the full ramifications of the introduction of an organization-wide framework for multi-year planning.
3. The requirement that the regional strategy include a theory of change has resulted in a stronger and more articulated protection strategy to inform the RNB's activities. At the same time, given the template and the structure of the MYMP, national specificities were not as easily visible as for a single country office – reducing the utility of the planning framework for UNHCR offices covering multiple countries (MCOs).
4. In the future, the RNB is likely to face multiple scenarios of population movements and pressures to reduce protection standards in the countries it is responsible for. While the RNB has responded appropriately to the policy and context changes in the sub-region, its capacity to respond on multiple fronts simultaneously in an effective and timely manner may be challenged without additional capacity.

On [operational structure and resources of UNHCR](#) the evaluation identified that:

1. The RNB has so far not found the optimal structure to deliver on its priorities and to deal with emerging challenges. Ad-hoc attempts hamper a strategic approach towards in-country presences which could match regional priorities, opportunities at country-level and risk analysis. Decentralization has not solved the challenges posed by the RNB's current structure.
2. The current financial and personnel resources of the RNB challenge the effectiveness and efficiency of the office in light of its discrepant geographical responsibilities. The division of tasks within the RNB structure and capacities are a constant dilemma.

3. The relationship between the RNB and other UNHCR entities is generally strong, but is hampered by the lack of a clear understanding of division of responsibilities with UNHCR HQ and Regional Bureau for Europe (RBE) and of an appreciation of the capacities of the RNB to achieve these.
4. The new RBM (COMPASS) approach is potentially valuable and useful to manage and demonstrate results, but there are constraining factors influencing the full leveraging of the system for country-based planning and analysis and evidence-based decision-making.

On the [extent to which the RNB sufficiently leveraged partnerships with relevant stakeholders](#), the evaluation noted that:

1. There are untapped opportunities to further identify, develop and strengthen partnerships in the Nordic and Baltic countries. Cooperation with partners have been constrained by limited human resources and a focus on more traditional approaches in the sub-region such as a focus on litigation.
2. The RNB was not able to fully meet its objectives in terms of advocacy and visibility of refugee and stateless related issues in the Nordic and Baltic countries. There is a need to address and balance expectations from CSOs and other private stakeholders in light of their expressed need for more robust engagement by UNHCR in the public arena.
3. The Global Compact on Refugees (GCR) process in the Nordic and Baltic countries is led by UNHCR HQ with limited involvement of the RNB. The GCR approach has the potential to further leverage UNHCR's role in the Nordic and Baltic countries by explicitly tying global solutions to domestic issues in the sub-region.

Conclusions

In conclusion, the number of legal and contextual developments in the region, and the need to continue to advocate for upholding protection standards in conformity with the 1951 Convention demonstrates the importance of effective representation in the Nordic and Baltic countries based on detailed contextual knowledge alongside maintaining strong relationships with civil society and State stakeholders. The last six years have clearly demonstrated that the Nordic and Baltic countries are not a static protection environment. UNHCR Offices across the European region, including the RNB, will have to continue to adapt in order to address the legislative changes.

The Office may consider rebalancing its investment in legal support and litigation – reserving its interventions to only those cases that have direct relevance for the interpretation of the 1951 Convention. Sponsoring litigation in individual case work could possibly be better carried out by well-placed national organisations and associations that have the corresponding knowledge and expertise. More generally, an in-depth reflection process is needed as to what role UNHCR can effectively take on in environments such as the Nordics and Baltics, and to more clearly define and communicate its added value, including for UNHCR to promote its role in amplifying the voices of refugees and commit to fully support partners working on statelessness.

It is vital for the RNB that the operation retains its nimbleness and ability to swiftly pivot, and to continue to manage a range of different challenges and relationships in the region. The Office will continue to have to find and maintain a workable balance in terms of managing its priorities within finite financial resources, selecting staff with the right expertise and language skills, and building coherence between the office in Stockholm and country presences. The RNB is unable to deal with additional requests without staff members becoming quickly exhausted and with the regular priorities hampered, thus requiring the temporary support from other European offices, the Regional Bureau, Division of International Protection (DIP) or the emergency standby roster, in cases of exceptional workload.

The change process initiated by UNHCR is a step in the right direction as the Organization is now oriented to formally record and strengthen its strategic thinking with a longer-term perspective and through a more coherent results-based management framework. There is a need for clarification and streamlining of the way in which the RNB and potentially other Multi- Country Offices interlock and interact with the Regional Bureau and the broader HQ services and divisions, and for a more tailored approach to the way in which corporate tools consider the unique nature of these structures within UNHCR. While on the whole the support provided by the Bureau and Headquarters Divisions, to the RNB has been effective, there has been friction and a lack of coherence between the RNB, UNHCR’s HQ and the RBE, and missed opportunities to fully capitalise on the benefits of decentralisation.

The RNB has established valuable partnerships with a range of stakeholders, yet there is room for improvement in terms of identifying, selecting and maintaining these partnerships. There is a need for greater transparency with external audiences on what the RNB’s role is in the Nordics and Baltics, both with Member States and civil society partners; where possible explaining what it has prioritized and why, to better manage expectations.

Finally, the evaluation team notes that there has been historically a limited direct engagement with persons of concern or representative bodies outside the RNB engagement with civil society organisations. In order to add legitimacy and deepen protection and solutions analysis, the RNB would benefit from finding avenues to periodically and more directly exchange with persons of concern and have a first-hand understanding of their conditions and the challenges they face.

Recommendations

For the RNB

Communicate more transparently on the RNB’s role in the region to States and partners with the aim to better manage expectations.

Strengthen the strategic and forward-looking approach of the RNB by reorienting its priorities towards greater investment in relationships with Government, civil society, NGO partners and other stakeholders.

Re-emphasize UNHCR’s role to amplify refugee voices and perspectives and ensure that persons of concern are more visible in UNHCR’s communication and advocacy strategies.

For the Bureau

Enhance and strengthen the RBE’s capacity to provide normative guidance, maintain coherence and manage information flows between HQ and the RNB. Moreover, the RBE should further clarify its role, available capacities and resources in emergency or emergency like situations for Europe at large.

For UNHCR HQ

Streamline tools, guidance and processes by “rightsizing” UNHCR’s RBM and reporting expectations with regards to the RNB and other similarly sized operations.

Jointly clarify the respective roles of the Division of External Relations (DER), the RBE and the RNB in resource mobilisation; and enhance internal communications on resource mobilisation

Chapter 1: Background and context of the evaluation

1.1 Introduction

1. UNHCR's operations in the Nordic and Baltic countries are managed by the Representation of the Nordic and Baltic Countries (RNB), supported by the Regional Bureau of Europe (RBE) and the Headquarters in Geneva. The RNB oversees eight countries for UNHCR: five Nordic countries (Denmark, Finland, Iceland, Norway and Sweden) and three Baltic countries (Estonia, Latvia and Lithuania). The RNB is thus a Multi-Country Office (MCO) with its main office located in Stockholm, Sweden (with 24 staff). In addition, there are two small liaison offices in the region, one in Vilnius, Lithuania since 2015 and the other in Copenhagen, Denmark since 2017 (each with two staff members).
2. In 2021, UNHCR's Evaluation Service commissioned an external strategic evaluation of UNHCR's Operations in the Nordic and Baltic countries following a request by the RBE. An independent assessment and review of the activities of UNHCR were deemed necessary to reflect on a number of ongoing developments, both internally within the Organization and externally in the protection environment in the region. This evaluation therefore presented an opportunity to take stock of UNHCR operations in the Nordic and Baltic countries, to identify the first results of ongoing change processes and to reflect on UNHCR's contribution to enhance international protection for Persons of Concern (POC) in this region. Initially, when this evaluation was commissioned the focus of this exercise was the delivery of the Office's Multi Year Multi-Partner (MYMP) strategy between the years 2017-2020. During the course of the evaluation, significant contextual developments occurred within the region, with a sudden and exponential increase in the number of asylum-seekers coming across from Belarus into Lithuania and Latvia. These challenging developments were further compounded by the large-scale displacement of Ukrainians and other nationalities resident in Ukraine (internal and cross border) following Russian military activities in Ukraine in February 2022. Data gathering and analysis for this report was completed prior to the Ukrainian situation and thus could not take into account the plethora of policy changes in Europe nor the effects on UNHCR operations or, most importantly, on UNHCR's persons of concern. Readers of the report should be cognizant that the findings and analysis that follow in the report were produced prior to the conflict and displacement.

1.2 Regional trends

Protection and asylum situation

3. All countries covered by the RBN are EU Member States, with the exception of Norway and Iceland, both of which are part of the European Economic Area (EEA). Though only bound by Dublin III and EURODAC, they both coordinate asylum issues with neighbours and have traditionally applied the EU asylum acquis. Denmark is part of the European Union, but not part of the Common European Asylum System (CEAS) or the EU Asylum Acquis (the Dublin III Regulation does apply, however.)

4. The so-called 2015 Mediterranean “refugee crisis” marked a significant change in the number of refugees and migrants moving to Europe. The influx unsettled the migration and asylum regimes within the EU and the Northern Europe sub-region was no exception. The higher number of unaccompanied minors from Afghanistan seeking asylum in Scandinavia was perceived as particularly challenging.¹ In 2015 alone, UNHCR estimated that there were one million sea arrivals² with most of these proceeding onwards from Southern Europe. Both Germany and Sweden shouldered the bulk of refugee arrivals, with new asylum applications reaching 163,000 in 2015 in Sweden alone.³ While Finland and Norway received only 38 per cent of the equivalent of their Swedish neighbour, both countries ranked fourth and fifth respectively in asylum receipts per capita in 2015.⁴ The trend continued until the so-called EU-Turkey Deal took effect in 2016, with new applications falling by 84 per cent across the sub-region after the EU-Turkey Deal.⁵
5. Despite these lower numbers of asylum applications after 2016, a more restrictive asylum approach leaning towards minimum standards has since been observed in the Nordic countries. In addition, stricter border controls were introduced post-2015, particularly in Sweden, Denmark, Norway and Finland. The recognition rates for asylum claims varied between countries (for example in 2019, recognition of asylum claims stood at 34 per cent in Sweden compared to 69 per cent in Norway)⁶. There were also significant developments with regards to lengthening waiting times for family reunification in Denmark (issued in 2015).⁷ In 2020, due to tighter internal EU border controls as well as COVID 19 travel restriction, the number of arrivals has remained low, with no major new influx observed. The same is true for asylum applications in the EU+ area, which in 2020 dropped by one third compared to 2019.⁸
6. The use of restrictive measures poses two different types of challenges for the Nordic countries: a) how to apply restrictive measures while upholding standards established by international and regional obligations; and b) the management of internal border controls within the Schengen area. Countries have to be able to explain that the measures are exceptional and warranted by a serious threat to security. Internal border control measures adopted by one or more countries in Europe have also prompted others to follow suit.⁹

Garvik, M., Valenta, M. Seeking asylum in Scandinavia: a comparative analysis of recent restrictive policy responses towards unaccompanied Afghan minors in Denmark, Sweden and Norway. CMS 9, 15 (2021). <https://doi.org/10.1186/s40878-020-00221-1>.

² UNHCR. Over One million sea arrivals reach Europe in 2015, 30 December 2021, <https://www.unhcr.org/news/latest/2015/12/5683d0b56/million-sea-arrivals-reach-europe-2015.html>

³ <https://www.unhcr.org/nea/wp-content/uploads/sites/15/2020/12/UNHCR-Study-on-Community-Sponsorship-Program-in-Sweden.pdf>

⁴ Arno Tanner, Overwhelmed by Refugee Flows, Scandinavia tempers its warm welcome, <https://www.migrationpolicy.org/article/overwhelmed-refugee-flows-scandinavia-tempers-its-warm-welcome>, 10 February 2016.

⁵ In March 2016, the European Union entered into a landmark agreement with Turkey, through which hundreds of thousands of migrants had transited to reach EU soil, to limit the number of asylum seeker arrivals. Irregular migrants attempting to enter Greece would be returned to Turkey, and Ankara would take steps to prevent new migratory routes from opening (Kyilah Terry, the EU-Turkey Deal: Five Years on: A frayed and controversial but enduring blueprint, 8 April 2021, <https://www.migrationpolicy.org/article/eu-turkey-deal-five-years-on>,

⁶ Countries in the sub-region did not have homogenous groups of asylum-seekers as the countries of origin or habitual residence varied from country to country.

⁷ Institut for Samfunnsforskning, the Future of Nordic Immigration Policies, 8 May 2019, <https://www.samfunnsforskning.no/english/projects/the-nordic-institute-for-migration/seminars/the-future-of-nordic-immigration-policies.pdf>.

⁸ EASO, EASO Asylum Report 2021: Annual Report on the Situation of Asylum in the EU, 2021,p.28, <https://euaa.europa.eu/sites/default/files/EASO-Asylum-Report-2021.pdf>

⁹ Institut for Samfunnsforskning, op. Cit.

7. The most far-reaching changes to the asylum system in the sub-region took place with the adoption in 2019 by Denmark of the so-called “Paradigm Shift Act”, more formally known as the L 140 bill¹⁰ which was approved by the Danish Parliament on 21 February 2019 with support from the conservative-liberal governing coalition, the leading opposition party of the Social Democrats, and the far-right Danish People’s Party. This bill contained amendments to several laws,¹¹ and introduced, among other initiatives, a principle of temporality of protection for asylum-seekers and refugees in Denmark, a potential cap on family reunifications and a reorientation of the policy focus away from integration to one of temporariness of protection and early return accompanied by a substantial decrease of social benefits for refugees, now renamed ‘return support.’¹² UNHCR had expressed several concerns about the draft bill prior to its adoption, in particular, the criteria and laws stipulating the requirements for the revocation of a refugee’s residence permit, which it described as not being adequate.¹³
8. Although Baltic countries are EU Member States and participate in the CEAS, the laws, policies and practices of each of the three countries are viewed by independent experts and NGOs as not fully in line with international and EU standards. For instance, the registration of asylum requests by border guards is not standardized. This, together with the lack of integration opportunities, has led to onward secondary movements.¹⁴ Furthermore, while Lithuania and Latvia may mainly be seen by some asylum-seekers and refugees as transit countries, reception capacity and asylum procedures for those detained remain a concern. At the same time, whereas integration systems

RNB Budget and Staffing

RNB has - over the years - experienced a reduction in the financial resources at its disposal. From 2018 to 2021, the operational level (OL) of RNB was reduced by \$543,393 from \$4,203,394 and its comprehensive budget by \$423,653 from \$5,371,297 during the same period. For an office as small and covering as many countries as RNB does, this reduction in resources is noteworthy. The RNB did receive, however, a significant increase in resources in 2019 (\$515,609 in the comprehensive budget and \$494,400 in the OL)

The RNB set up has been restructured in 2021 through the establishment of a formal Integration Unit, with the replacement of a consultant level position by a more secure P3 integration post, in addition to the consolidation of a Communications and External Relations Unit. Furthermore, the Administration Unit has been reinforced by a GS-5 position. Currently, the Regional Representative is formally accredited to each of the eight countries in the sub-region. The management team for the operation comprises the Deputy Representative, two Senior Legal Officers overseeing the Nordic and Baltic sub-regions, the Senior Strategic Communications Officer and the Head of Administration.

¹⁰ <https://www.ft.dk/samling/20181/lovforslag/l140/index.htm>

¹¹ Amendments were introduced to the Aliens Act, the Integration Act, the Act on Active Social Policy and the Repatriation Act. The Aliens Act, the wording of § 7 and § 8 was changed, clarifying that every residence permit given to refugees should only be granted temporarily and that temporary permits should also apply to quota refugees. (Ibid)

¹² ECRE, Denmark: “Paradigm Shift” takes race to the bottom to a new low, 1 March 2019, <https://ecre.org/denmark-paradigm-shift-takes-race-to-the-bottom-to-a-new-low/>.

¹³ See: <https://www.unhcr.org/neu/wp-content/uploads/sites/15/2021/01/UNHCR-Recommendations-to-Denmark-on-strengthening-refugee-protection-in-DK-Europe-and-globally-January-2021.pdf>

¹⁴ UNHCR, Regional Chapeau of MYMP, Regional Representation for Northern Europe, 17 October 2019 (unpublished).

in both Estonia and Lithuania have shown some improvement, long-term strategies are generally absent in the three Baltic countries.

9. Similar to the Nordic countries, immigration from non-EU countries and integration has been the subject of intense debate in the Baltic countries. The Migrant Integration Policy Index published by the Migration Policy Institute points to increased public concern about migration, and the implications an increased influx would have on the character of society, its make-up and social welfare.

Durable solutions

10. The Nordic countries have well-established integration programmes that provide many good practices and the rights of refugees are in line with international standards, particularly in the area of durable solutions. At the same time though, there is a prevailing political narrative focused on reducing benefits, reducing integration support or putting the onus on refugees to quickly find jobs and become self-reliant in order to be eligible for long-term residence permits and family reunification.¹⁵ Concerning political participation by refugees and migrants in the Nordic countries, Norway is at the forefront, where non-EU migrants are politically active, and where Norwegian cities have established consultative platforms. According to a UNHCR Concept Note from 2021, migrants and refugees enjoy higher levels of political participation in the Nordic countries compared to the three Baltic countries.
11. Many Nordic countries also remain longstanding resettlement partners of UNHCR, offering a significant percentage of the overall EU resettlement places and the possibility to consider the submission of urgent and emergency cases. While Baltic countries do not have formal resettlement quotas, they have participated in the EU relocation schemes receiving some refugees and asylum-seekers from Italy, Greece and Malta. Resettlement numbers to the Nordic and Baltic countries have decreased since 2017, mirroring a trend worldwide as shown by the resettlement figures from 2016-2021. COVID-19-related restrictions have further driven down the resettlement arrivals in the sub-region.¹⁶
12. Integration of refugees has been observed as a challenge in the Baltics given that many refugees and persons of concern still have the aspiration to continue onwards and see them purely as transit countries. In addition, and as confirmed in this evaluation, there has been some reticence among the host communities regarding refugees and migrants which then affects the ability of the latter to integrate and find work. Capacity in small towns to welcome and integrate arrivals outside the capitals has been limited, as is the case in Lithuania. This reality has also partially resulted in onward movement of refugees and migrants. UNHCR and host governments experienced challenges in reaching out to those refugees and migrants that do remain in the Baltics to share information and to ensure they are engaged in the society they live in. Opportunities for migrants and refugees to integrate (including to learn the national languages) are also limited.

¹⁵ See for example Garvik, M., Valenta, M. Seeking asylum in Scandinavia: a comparative analysis of recent restrictive policy responses towards unaccompanied Afghan minors in Denmark, Sweden and Norway. *CMS* 9, 15 (2021). <https://doi.org/10.1186/s40878-020-00221-1>.

¹⁶ UNHCR, With Refugee Resettlement at a record low in 2020, UNHCR calls on States to offer places and save lives, 26 January 2021, <https://www.unhcr.org/neu/50329-with-refugee-resettlement-at-a-record-low-in-2020-unhcr-calls-on-states-to-offer-places-and-save-lives.html>.

Statelessness

13. At the beginning of 2020, the number of persons UNHCR reported under its statelessness mandate was 339,452 across the region. All of the Nordic countries have ratified the European Convention on Nationality, but several countries in the region maintain reservations to the 1954 and/or 1961 Conventions. UNHCR advocates for the withdrawal of these reservations, particularly where a country is already meeting the standards, as is the case of Finland. Unlike Lithuania, both Estonia and Latvia had a significant stateless population resulting from the dissolution of the former Soviet Union in 1991. However, numbers have since decreased due to the acquisition of other nationalities, mainly Russian, and deaths.

Situation at the Lithuania-Belarus border¹⁷

14. Since summer 2021, the number of third country nationals gathering at the external border of the EU on the Belarusian side and attempting to enter Lithuania increased, thereby becoming a cause of concern for the Lithuanian, Latvian and Estonian authorities. In response, these countries, supported by EU Member States,¹⁸ adopted policies at the EU's external borders to restrict the entrance of these migrants into these countries.¹⁹ The plight of the migrants at the border quickly became politicized as the EU and Belarus' neighbours suspected Minsk of facilitating and organizing the travel of these migrants in an attempt to put pressure and destabilize the EU following the imposition of EU sanctions in May 2021.²⁰ On 3 December, the UN Committee on Torture observed that while Lithuania was facing unprecedented challenges from an ongoing refugee and migrant crisis, "the reported instances of collective expulsion of asylum-seekers and pushback operations" at its borders were concerning. It called upon Lithuania to ensure access for all asylum-seekers to asylum procedures, as well as to ensure appropriate reception conditions in accommodation sites for refugees, asylum-seekers and undocumented migrants.²¹
15. UNHCR has also publicly spoken about the situation at the border. On 11 October 2021, UNHCR stated that it acknowledged "the challenges, faced by Lithuania in this unprecedented situation, which the government also assesses in the perspective of national security"²². At the same time, UNHCR condemned any instrumentalization of refugees and migrants by States to achieve

¹⁷ While 2021 was not the initial scope of the evaluation, given its importance and impact on the work of RNB, a regional description of the sub-region would be incomplete without a description of the situation at the Lithuania-Belarus border.

¹⁸ In a letter dated 7 October 2021, the interior ministers of eight EU Member States expressed their support for what they called 'resolute measures' adopted by the Polish, Lithuanian, Latvian and Estonian governments to address the 'aggression' by the Belarusian regime and the instrumentalization of 'illegal migration for political purposes and other hybrid threats'. (Ibid, p. 5).

¹⁹ These restrictions included pushbacks, summary expulsions without individual circumstance assessment and access to asylum procedures. Sergio Carrera, CEPS, Walling off Responsibility? The Pushbacks at the EU's external Borders with Belarus, CEPS, 25 November 2021, p.14.

²⁰ Ibid, p.1.

²¹ OHCHR, UN Committee Against Torture publishes findings on Bolivia, Kyrgyzstan, Lithuania, Nigeria, Serbia and Sweden, 3 December 2021,

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=27897&LangID=E>.

²² UNHCR, Acknowledging the extraordinary situation in Lithuania, UNHCR raises concerns about legislative response and accommodation conditions, 11 October 2021, <https://www.unhcr.org/neu/68731-acknowledging-the-extraordinary-situation-in-lithuania-unhcr-raises-concerns-about-legislative-response-and-accommodation-conditions.html>,

political ends.²³ On 22 October 2021, UNHCR urged States to end the stalemate at the Belarus/EU border.²⁴

Donor relations and resource mobilization

16. Overall, the countries covered by the RNB contributed around 410 million to UNHCR in 2021, the Nordic countries represent some of UNHCR's strongest partners with Sweden being the fifth largest donor, Norway the seventh and Denmark the eighth in 2021.²⁵ The Nordic countries are also strong supporters of the Global Compact on Refugees (GRC) and the Global Refugee Forum (GRF), acknowledging the need for a new funding mechanism for refugee assistance. The RNB continues to generate financial and political support for the GCR, including through engagement with local politicians and parliamentarians. As for the Baltic countries, Latvia has provided symbolic contributions (\$12,844) in 2021, while both Estonia (\$698,745) and Lithuania (\$59,669) have increased their unearmarked funding to UNHCR. In terms of multi-year contributions (2021 to 2024 and onwards), Sweden and Denmark are the top two donors to UNHCR with respectively \$507,5 million of which 78% is unearmarked and \$479,45 million of which 44% is unearmarked.²⁶

1.3 UNHCR change process

17. In 2017, UNHCR Headquarters completed a rapid organizational assessment that initiated a change process with the goal that UNHCR remain agile and "fit for the future". By then, and also in 2014, it had already initiated the gradual move towards a multi-partnership approach to further protection and identify solutions for persons of concern. Below is a brief overview of the main areas that UNHCR's change management process addressed.

1. **MYMP:** In 2017 UNHCR introduced a new approach to planning which aimed at moving from an annual planning system to a multi-year multi partnership (MYMP) process, allowing country operations to maintain a longer-term focus on achieving solutions. Starting from 2018, initially six operations were included in the pilot phase for the MYMP approach, including the RNB which consisted of off-line high-level, multi-year protection and solutions strategies usually for a period of 5 years. Elements of the MYMP were later integrated into the development of COMPASS which attempted a more comprehensive and systematic approach toward multi-year strategic planning, implementation, monitoring and reporting. It also aimed at shifting away from output-based performance monitoring to focusing more on changes, impact and outcomes.²⁷
2. **Decentralization and regionalization:** The High Commissioner announced in October 2018 that the Organization's regional bureaux would move away from HQ to become more field focused. Within this process, the number of bureaux increased from five to seven.²⁸ The intention clearly went beyond geographic restructuring with many factors driving this move. These include: a) the Global Compact on Refugees (GCR) affirmed by the General Assembly

²³ UNHCR, UNHCR urges States to protect refugees' rights not to instrumentalize their plight, 27 July 2021, <https://www.unhcr.org/neu/64163-unhcr-urges-states-to-protect-refugees-rights-not-to-instrumentalize-their-plight.html>.

²⁴ UNHCR, UNHCR urges States to end Stalemate at Belarus/EU border and avoid further loss of life, 22 October 2021, <https://www.unhcr.org/news/press/2021/10/6172af254/unhcr-urges-states-end-stalemate-belarus-eu-border-avoid-further-loss-life.html>.

²⁵ UNHCR Global Report 2022. The Stories behind the numbers. [Global Report 2021 | Global Focus \(unhcr.org\)](https://www.unhcr.org/global-report-2021)

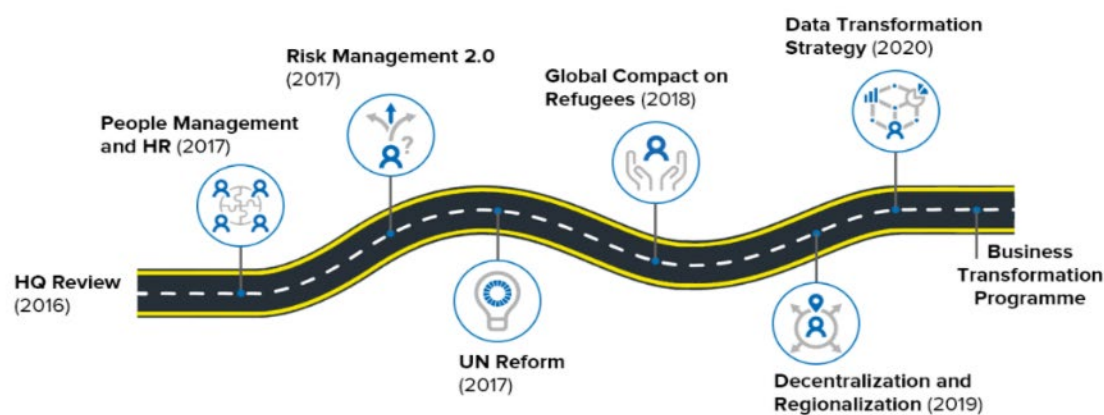
²⁶ UNHCR Global Report 2022. The Stories behind the numbers. [Global Report 2021 | Global Focus \(unhcr.org\)](https://www.unhcr.org/global-report-2021)

²⁷ UNHCR, Evaluation of UNHCR's data use and information management approach, ES/2019/07, November 2019, <https://www.unhcr.org/5dd4f7d24.pdf>, p.18.

²⁸ UNHCR, Quick Guide to UNHCR: Regionalization and Decentralization Process, <https://www.unhcr.org/5d1b87787.pdf>.

in December 2018 required renewed commitment and collaboration with a range of new and traditional partners; b) the realization that forced displacement was also linked to development challenges, meaning there was a need to transcend traditional humanitarian work; and c) the 2030 Agenda for Sustainable Development and the commitment to “leave no one behind. This process of change management led to the reshaping of certain functions and the creation of new structures such as the Division of Strategic Planning and Results, the Division of Resilience and Solutions, the Global Data Service, the Partnership and Coordination Service, and the Transformation and Change Service.²⁹

Figure 1: Major change management milestones



3. **RBM**: Simultaneously, the Organization’s RBM revision project has evolved from a relatively straightforward attempt to improve or replace Focus (UNHCR’s programme planning and reporting tool), to a more ambitious effort to transform the way UNHCR conducted strategic planning and the monitoring of results and impact. The COMPASS PLAN phase was rolled out in early 2021 (and is therefore outside the scope of this evaluation). It included a new reporting tool to replace FOCUS and a new approach to multi-year planning, budgeting, monitoring and reporting. Operations were able to select between 3–5-year planning horizons or a one-year interim strategy using a new and somewhat simplified results chain and framework, more aligned with the SDGs and providing greater flexibility for offices to better reflect their strategy and results.³⁰
4. **Business Transformation Programme (BTP)**: In 2019, UNHCR started to implement a BTP that aimed at exploring and implementing new ways of working and leveraging modern tools and cloud technologies to support back-office processes.³¹ This includes - amongst others- COMPASS.

²⁹ UNHCR, Background to Business Transformation Process, 29 June 2021.

³⁰ UNHCR, Remarks for the 81st Standing Committee meeting Executive Committee of the High Commissioner’s Programme Kelly T. Clements, Deputy High Commissioner 5-7 July 2021. <https://www.unhcr.org/60e448d04>

³¹ UNHCR, Business Transformation Programme, 5 February 2021.

18. UNHCR therefore strove to achieve a balance between HQ and the field, with country operations supported by seven regional bureaux. The reorganized bureaux now had the objective of becoming “critical hubs for collaboration and strategic engagement, as well as for addressing any cross-cutting operational challenges. Regional Directors would have primary accountability for overall strategic decision-making, regional prioritization and quality assurance, with enhanced delegated authority to effectively manage their respective regions.”³²

³² <https://www.unhcr.org/5d81f9620.pdf>

Chapter 2: Evaluation scope and methodology

2.1 Evaluation purpose

19. The main purpose of the evaluation was to present timely evidence to inform UNHCR's future operational planning and strategy in the region covered by the Representation for the Nordic and Baltic countries – later renamed the Multi-Country Office (MCO) for UNHCR Northern Europe in 2020 - leading to more effective and impactful UNHCR partnerships and programming, in pursuit of protection and solutions for UNHCR persons of concern and communities that host them. In addition, the evaluation sought to analyse and assess the effectiveness of UNHCR's plans and activities in light of the evolving needs of the population, political and policy trends at the government level and the work of UNHCR's partners and other key civil society stakeholders.
20. The evaluation thus:
- Offered an opportunity for the Organization to reflect and learn lessons from the experience of RNB on the MYMP planning process.
 - Provided an inflection point for the RBE, and possibly other regions with MCOs, to better understand how effectively it provides support to MCOs and Country Offices (COs) through the MYMP process in anticipation of the wider organizational roll-out of multi-year planning.
 - Provided an opportunity for the RNB to reflect on the implementation of its MYMP strategy, particularly its strategic engagement with partners on issues of concern to UNHCR.
 - Highlighted recommendations intended to be practical, feasible and forward-looking in their orientation, based on identified lessons learned in the RNB.

2.2 Key evaluation questions

21. The four evaluation questions, each corresponding to one chapter of the “key findings” section, are as follows:
- a. Did RNB identify and prioritize the most relevant issues to strengthening the protection environment and supporting solutions in the countries that fall within the sub-region? (Chapter 3)
 - b. How fit-for-purpose is the current RNB's operational structure and resources to deliver its priorities? (Chapter 4)
 - c. To what extent has the RNB sufficiently leveraged partnerships with relevant stakeholders, including civil society organizations, to advocate for and support refugee protection and solutions? (Chapter 5)
 - d. At this stage, what lessons can be learned from the Nordic and Baltic multi-country operation regarding the implementation of its global and local priorities in high-income country contexts where UNHCR provides less/no direct support to POC? (Chapter 6)

2.3 Evaluation scope and audience

22. The evaluation scope is defined geographically (eight countries managed by the RNB) and timewise (2017-2020). However, given the developments in 2021 in Denmark (in terms of externalization) and Lithuania (refugee crisis at the border with Belarus), it was decided to include reflections on how UNHCR approached these events in a retrospective manner. This evaluation

does not constitute a full assessment of the RNB response to these particular situations. In addition, the findings, of this evaluation were drafted before the conflict in Ukraine erupted, leading to a significant inflow of refugees that have affected the whole of Europe, as well as resulted in a situation of massive internal displacement. Although the findings were not reviewed to reflect these arising needs, the conclusions and recommendations were reviewed to be better situated in the context of Spring 2022. In addition, it needs to be noted that the evaluation took place after a period of less direct interactions between the RNB and external stakeholders due to COVID-19 contact and travel restrictions.

23. The primary audience for the evaluation is the RNB and the RBE. Other UNHCR Bureaux and Divisions, as well as UNHCR's partners – including government and protection actors – will serve as its secondary audience.

2.4 Evaluation methodology

24. The evaluation is forward-looking as it aims to inform UNHCR's future operational planning and strategy in the Nordic and Baltic countries, leading to more effective and impactful UNHCR partnerships and programming. Hence, the evaluation had a utilization-focused objective and was realist in its approach.³³ Complemented by case studies, it enables the understanding of how programming works and how different elements work together in practice.
25. Building on initial data collected during the inception phase, the evaluation followed a mixed methods approach combining in-depth desk review (164 documents, including 149 internal and 15 external), as well as content analysis based on internal and external perceptions and opinions: a) 32 remote key informant interviews (KII) mainly with current and former RNB, RBE and HQ staff, and 40 remote KII with external interlocutors in Sweden, Norway, Lithuania and other locations (e.g. Switzerland, Belgium, Malta) ranging from governmental entities, non-governmental organizations, UN agencies, EU institutions, academia and think tanks; b) 15 responses from internal staff to an online survey (41 per cent response rate) and 32 responses from external interlocutors to the three different online surveys targeted to governmental entities (13 responses, 24 per cent response rate), partners (15 responses, 22 per cent response rate) and academia (4 responses, 22 per cent response rate). The online survey had a complementary function to provide further details and aggregated data to findings from the document review and key informant interviews.
26. The three country case studies were selected based on the following criteria, namely:
1. **Sweden**: Presence of the RNB in Stockholm; the high number of asylum-seekers and refugees; historically high standards of asylum and protection systems; and high financial and political support to UNHCR's work and solid and historical partnerships.
 2. **Norway**: Major public donor to UNHCR and supporter of its activities worldwide; absence of a physical office with bulk of its activities conducted remotely (focused on advocacy and legal support).
 3. **Lithuania**: Presence of a liaison office (the only physical presence in the Baltics) and growing partnerships on integration, as well as with refugee-led organizations. The increasing numbers

³³ A realist evaluation approach assesses "What works, for whom, in what respects, to what extent, in what contexts, and how?"

of Belarusians arriving, as well as the site of arrivals of third country migrants via Belarus, occurred after the selection of the case study, but confirmed the value of its selection.

27. The evaluation was guided by the **OECD/DAC criteria**, namely relevance, effectiveness, efficiency, internal and external coherence, and (early) impact. It was supported by an evaluation matrix which compiles the evaluation questions with the evaluation criteria, judgment criteria and means of verification (see Annex 3 for the complete matrix). The original five evaluation questions defined by the ToRs were restructured by the evaluation team into four key main questions and 13 sub-questions.³⁴
28. In order to address the need to assess eight different countries with specific political and operational contexts over a period of four years in the middle of UNHCR's organizational change process, the following structure guided an analytical approach with three closely linked research dimensions:
 - 1) **WHAT** - explored what UNHCR aimed to achieve in terms of its mandate, goals, and strategy with a clear focus to assess the relevance and effectiveness of the prioritization of the RNB in response to the protection needs in the sub-region. Relevant topics included implementation of activities on protection, the search for solutions, and advocacy in the format of the MYMP (without assessing the MYMP as a change process in itself). Criteria: **Relevance, Effectiveness**
 - 2) **HOW** - assessed the tools and mechanics used by UNHCR to implement its mandate and objectives, focusing on the issue of efficiency to assess if the RNB possesses the appropriate structure, resources, support, and guidance to implement its priorities. Relevant topics include human and financial resources, operational structures, internal coordination, and communication. It enabled an assessment of the current situation, a stock-taking of the structure and capacities, and identification of recommendations and possibilities for improvements. Criteria: **Efficiency, (Internal) Coherence**
 - 3) **WITH WHOM** - addressed UNHCR's partnership approach, namely how and with whom UNHCR operates to implement its activities in order to assess if the correct partnerships are in place to implement the identified priorities and the level of coherence with other actors operational in Europe. Relevant topics included external relations, partnerships, and external coordination. It also assessed the extent to which the GCR (and GRF) has been leveraged for overall advocacy by UNHCR in the sub-region, while aiming to understand how advocacy can be more effective both as a stand-alone and joint objective of the Organization. Criteria: **(External) Coherence**.
29. Furthermore, the context – corresponding to a fourth dimension: the **WHERE** - allowed for an understanding, to a limited extent, of the importance that a geographic location can have on UNHCR's operations in the Nordic and Baltic countries, and the implications that the location can have on the access of POC to protection and assistance. In this sense, the results aim to guide UNHCR's programming and operations in this specific context by presenting lessons learned at

³⁴ Following feedback received during the inception phase, changes were made by reordering, simplifying and reducing the number of the evaluation questions, as well as linking them to the (dimensional) analytical approach.

this stage regarding the implementation of its global and local priorities in high-income country contexts where UNHCR provides less/no direct support to POC. Criteria: **(Early) Impact**.

30. The figure below illustrates the dynamics between all dimensions:

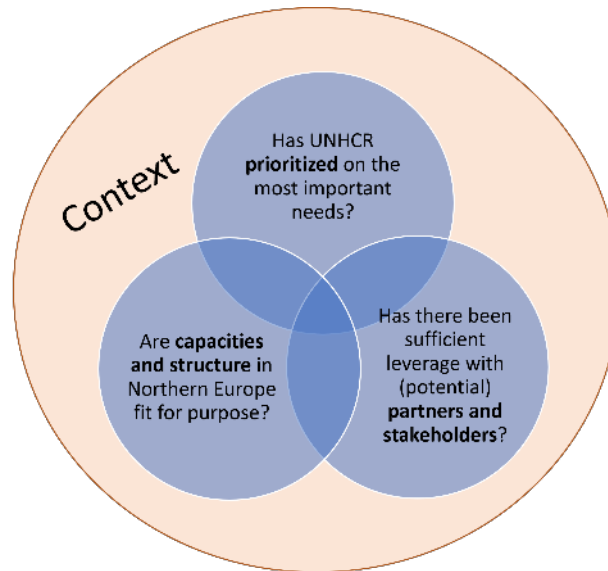


Figure 2: Methodological Approach for this evaluation

31. The evaluation matrix informed the analytical framework through a systematic and comprehensive approach. The evaluation followed ethical considerations namely in terms of equal **participation** of both internal and external stakeholders. The evaluation team also paid attention not to contribute to a certain evaluation fatigue, e.g., by designing survey questions (via the platform Survey Monkey) supported by multiple question formats enhancing user-friendliness, and making sure KIs were only conducted on a voluntary basis and only after the evaluation had been clearly explained to the interlocutors. Finally, in cooperation with UNHCR's evaluation manager, the evaluation team facilitated an in-person workshop at the office in Stockholm on 3 December 2021 during which it shared, discussed and validated initial findings with RNB staff. Staff actively participated and had the opportunity to express opinions and contributions to the preliminary findings. In addition, RNB staff contributed to the drafting of the recommendations to ensure that the outcome of this report would be user-friendly and realistic. Finally, the evaluation was supported by a Reference Group and an inception meeting was held in September 2021.

32. Furthermore, the team was particularly careful to ensure **confidentiality**: statements and survey answers are known to and kept by the independent evaluation team only; they were not attributed to any KI or survey respondent. Contact details and other personal information have not, nor will they be shared with any party outside of the evaluation team. Upon responding positively to the invitation of the evaluation team, KIs and survey respondents agreed to participate in the exercise and gave their consent. At the beginning of the interview, the evaluation team informed participants about: the objectives of the interview; the expected duration; the confidential nature of the process, including the fact that they would not be quoted directly without their consent; and those findings would not be linked to their person.

33. Finally, the evaluation team applied a **do-no-harm approach** aimed at not negatively affecting the work and reputation of UNHCR in the region, including any ongoing diplomatic and political discussions, or emergency responses.
34. All interviews were conducted remotely due to restrictions related to the pandemic and the emergency response in Lithuania. This approach justifies the delay in completing the data collection phase and the overall evaluation: as the situation along the Belarus/Lithuania border has evolved since the inception phase of the evaluation (June - August 2021) entailing more staff mobilization and enhanced collaboration with key in-country UNHCR interlocutors, data collection was conducted online for the case studies for Sweden and Norway in September-October 2021 and for Lithuania in November 2021.

2.5 Theory of Change

35. The evaluation team drafted the following **Theory of Change** (Figure 3) illustrating the role RNB plays in contributing to two main organizational goals: one aiming at global protection and solutions for POC (mainly in support of RBE and HQ); and the other centred around quality protection and solutions for POC in the Nordic and Baltic countries (through RNB's actions towards advocacy and partnerships). This Theory of Change supported the evaluation.

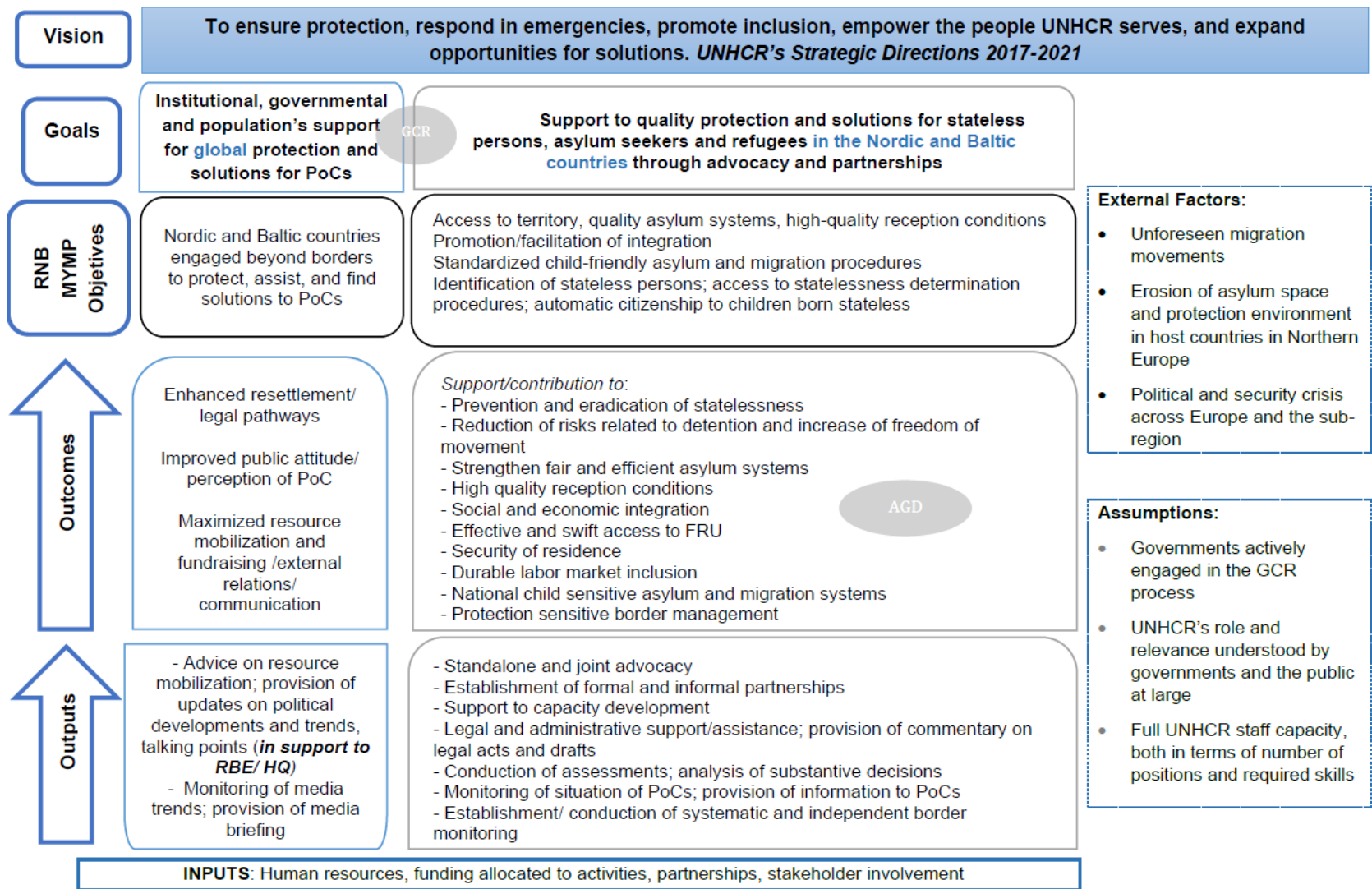


Figure 3: Theory of Change for the UNHCR Operations in the Nordic and Baltic Countries

Chapter 3: Prioritization of Protection and Solutions work in the Nordic and Baltic Countries

36. In this chapter, the first evaluation question will be discussed, namely if RNB identified and prioritized the most relevant issues to strengthening the protection environment and supporting solutions in the countries that fall within the sub-region. This includes how prioritization took place and which criteria were used to select activities in addition to an assessment of how the newly introduced MYMP contributed to the strategic approach and the ability of the RNB to prioritize. Finally, this chapter explores how well placed the RNB is to address emerging challenges, including in light of the COVID-19 pandemic, but also in relation to the shifting protection environment.

In its desire to ensure that the high legal protection standards that the Nordic region is known for are maintained, the RNB has continued to organize and deliver its work on protection using relatively traditional approaches (i.e., a heavy focus on commentaries on the normative legal framework for litigation on asylum cases and commentaries on the normative legal frameworks, as well as advocacy on resettlement). The evaluation team, while noting that this work is key to UNHCR's normative role observed that the RNB could have found opportunities to move beyond "doing business as usual" and been more creative in delivering its protection mandate. The RNB has however, been more innovative in the area of solutions by venturing into the "uncharted territory" of complementary pathways, following its recognition of a political opportunity in a number of countries to do so.

3.1 RNB's primary focus on legal protection

The following issues/activities received clear prioritization by UNHCR in the period 2017-2020:

37. Overall, in determining its prioritization and therefore the investments in time and resources, the RNB found it challenging to reconcile a number of competing priorities. Given the context, UNHCR has historically had limited direct operational engagement in the asylum procedures of the eight countries that it covered in the sub-region. The capacity of national authorities varies within the sub-region as does the capacity and expertise of civil society working on asylum and refugee related priorities and workstreams. The RNB therefore focused on trying to influence national legislation and policy design, support the capacity building of national officials and dialogues with national authorities and civil society organizations - with a view to improve the protection and solutions situation for persons of concern to it. As UNHCR did not have a physical presence in all of the eight countries, most of these actions were managed from its Stockholm and Vilnius offices.

38. Additionally, the Office has had to balance advocacy on shrinking protection space with leveraging the role and influence of governments in the sub-region in supporting the search for solutions for refugees globally. According to a number of key informants, at times there appeared to be an inherent conflict between the RNB's need to respond to concerns about the asylum and protection

frameworks of a country and the need for UNHCR to raise funds and political support for its global operations.

Legal protection

39. UNHCR has a supervisory responsibility of the 1951 Convention - a responsibility accepted by European governments. Regarding the sub-region under the RNB's purview, the Nordics had traditionally set high standards in terms of protection and asylum. In exercising its supervisory responsibilities, the RNB aspired for the sub-region to continue to be a "region of excellence" to inspire other countries. The RNB therefore continued to focus on advocating for the maintenance of good standards and challenging the erosion of protection standards in the sub-region.³⁵ UNHCR thus observed with concern some of the developing practice and policies that were adopted in response to the height of the mixed migration movement into Europe in 2015.
40. For example, and in response to the irregular arrival of 5,500 asylum-seekers (mainly from Afghanistan, Iraq and Syria) into Norway from Russia in the last months of 2015, the Norwegian Government pushed through a number of restrictive changes to its asylum law in under a week with limited consultation. In November 2015, it issued instructions for a fast track procedure³⁶ for asylum-seekers deemed to have arrived in Norway through a 'safe' third country where they were not persecuted, which included Russia.³⁷ Similarly, in January 2020, Sweden also presented a memorandum which outlined the legislative changes necessary to achieve a safe country of origin list (which it subsequently adopted in May 2021).³⁸ UNHCR had reacted to the proposal by the Government of Sweden by emphasizing that, while it recognized that the purpose of the proposal was to make asylum procedures more efficient, by accelerating the procedure for manifestly unfounded claims, such proposals should ensure all procedural safeguards, including a personal interview and access to an effective remedy.³⁹ In addition, temporary residence permits have been introduced that have stricter rules for family reunification in a number of Nordic countries. Given that many countries, including in the Baltics, look toward the Nordic countries and closely follow their practice, UNHCR's focus on legal protection received an additional justification.
41. In response to these changes, the RNB pursued "quieter" diplomacy, choosing to try work with, and raise its concerns bilaterally with the concerned host governments, including those of Norway, Sweden and Denmark. While balancing the way UNHCR engages with States in its legal supervisory role is indeed challenging, regardless of the context in which UNHCR works, the effect of this approach was however, to make its supervisory responsibilities and engagement with governments on their responsibilities less visible, both within government institutions and to other external stakeholders such as civil society - and potentially even persons of concern themselves.

³⁵ UNHCR, RRNE MYMP Regional Chapeau, 17 October 2019, p.1 (unpublished).

³⁶ Norway Ministry of Justice and Security [Fast-track procedure for asylum seekers arriving via Russia - regjeringen.no](https://www.regjeringen.no), November 2015

³⁷ ECRE, Concerns over forced deportation of asylum-seekers from Norway to Russia.

<https://ecre.org/concerns-over-forced-deportation-of-asylum-seekers-from-norway-to-russia/>, 29 January 2021.

³⁸ Swedjsh Refugee Law Center, Safe Country of Origin: Sweden, Updated 21 April 2021,

<https://asylumineurope.org/reports/country/sweden/asylum-procedure/the-safe-country-concepts/safe-country-origin/>.

³⁹ UNHCR, Observations by the United Nations High Commissioner for Refugees Representation for Northern Europe on the proposal to introduce in Sweden a list of safe countries of origin ("Uppenbart ogrundade asylansökningar och fastställande av säkra ursprungsländer, Ds 2020:2" <https://www.refworld.org/docid/5e8345014.html>), March 2020, para 7.

42. This is further highlighted in the RNB's attention to the evolving legal context in Denmark. Since the end of 2018, extensive time was devoted to dealing with the consequences of changes to Danish asylum legislation and mitigating the potential wider negative impact in the sub-region. UNHCR's formal public engagement on these reforms were evident in January 2019 when UNHCR submitted comments on the draft legal reform to Denmark's asylum legislation. In response, UNHCR expressed its concern about the changes introduced to asylum, integration, and family reunification. UNHCR emphasized that these measures risked marginalizing refugees further and would make durable solutions more difficult, particularly through its intention to review the protection status of persons when considering the extension of their residence permits under article 7 and 8 of the Danish Aliens Act.⁴⁰ According to most KIs, UNHCR's engagement on this issue was, in general, well managed though KIs argued UNHCR could have advocated more publicly earlier, especially as they noted these developments were not a surprise and "were a long time coming" prior to the emergence of the draft legislation in 2019.

The RNB invested substantially in strategic litigation as part of its efforts to exercise its mandate and impress upon governments to maintain adequate asylum and protection standards in policy and in practice. One of the key issues that RNB has addressed through litigation included the way in which different governments have revoked or terminated refugee status given to Syrian refugees. This investment in strategic litigation is in line with UNHCR's broader approach in Europe, where litigation has been used to challenge legislation and attempt to set precedent. While the RNB's use of the litigation "avenue" is understandable, the RNB's investment in directly leading and carrying this litigation work may not have been the best use of its time and resources given that: a) there are many experienced and specialized organizations and stakeholders that are already working on strategic litigation and have the required expertise, and b) the limited impact of such a heavy direct investment by UNHCR. UNHCR's engagement is rarely mentioned in court decisions in Sweden, and in several cases courts have not taken its views into consideration. Moreover, in Norway, of the dozens of cases on which UNHCR intervened, only one was successful. UNHCR's efforts on litigation, may be more impactful if it joined forces more regularly with other specialized actors and bodies working on litigation and carrying out joint assessments of the opportunities and impact of certain legal actions.

Community sponsorship

43. Community sponsorship refers to programmes where individuals or groups of individuals come together to provide, to varying degrees of commitment, financial, social, and practical support towards the reception and integration of refugees that are admitted to third countries. Community sponsorships aims to increase responsibility sharing, builds the capacity of new resettlement States, improves integration outcomes, and builds welcoming communities.⁴¹ Its objective is to support the reception and integration of refugees. With engagement from citizens and local communities to provide financial, emotional and practical help to newly arrived refugees, the programmes add to government-assisted reception and integration activities and is a way to develop positive and vital interaction between refugees and their new host communities.⁴² UNHCR, including the RNB, set out its intention to step up its advocacy for the sub-region to have more community-based sponsorship initiatives and is working to promote this with civil society

⁴⁰ UNHCR, Observations on the Law Proposal, 19 January 2019, p.1.

⁴¹ UNHCR, Community Sponsorship Programmes: Guidance for UNHCR staff Supporting Programmes Design and Implementation, 215, p.2.

⁴² UNHCR, Integration is better together, <https://www.unhcr.org/neu/about/our-work-community-sponsorship-programmes>

and governments in many countries.⁴³ In some countries, such as Finland, this was a direct response also to the interest expressed by the government and therefore an invitation that UNHCR responded to positively.

Resettlement and family reunification

44. UNHCR's efforts on resettlement are primarily led by the Resettlement Service in the Division of International Protection at HQ, with the RNB providing a supportive role. Stakeholders were appreciative of the RNB's supportive role and the way it engaged them on resettlement, and the manner in which the RNB involved them in the design of strategies, whether at sub-regional or regional level. UNHCR continued to appeal to the long-standing tradition of Nordic countries in receiving refugees.⁴⁴ Where it had been halted, such as in Denmark, UNHCR advocated for its resumption and welcomed this recommencement (though at much smaller numbers) in 2019.⁴⁵ The RNB continued to advocate for resettlement with countries that have not traditionally had resettlement programmes, such as Estonia.
45. Given the restrictions in family reunification in Nordic countries, the RNB also prioritized its work on advocating for policies to support family reunification. It created a multi-year action plan in mid-2018 with National Red Cross Societies for this purpose. It intended to highlight the negative impact of restrictions on family reunification.⁴⁶ Opportunities to establish legal pathways for extended family members were identified: strategic advocacy, cross-fertilization of good practices, and litigation together with partners and legal networks, e.g., on access to embassies, evidentiary requirements, fees, submission deadline, processing times etc.
46. Some work was carried out by the RNB on the issue of family reunification. For example, in [Norway](#), the non-profit organization advancing asylum-seekers rights, Norsk Organisasjon for Asylsøkere (NOAS), was contracted to produce a report on family reunification and provide training to different partners as well as raise the issue with the media.

Local integration

47. The RNB recognizes and embodies the catalytic role it needs to play in bringing relevant actors together around local integration and sharing good practices from within the region. Noting that municipalities did not routinely and systematically assess the situations of POC residing in their locales, or necessarily possess the expertise within their social care structures, UNHCR initiated a mapping of integration capacities and practices. This focused on the input that refugees themselves had provided to the national plans for integration, and which also informed the GCR process. UNHCR then involved the different ministries of Labour and Social Affairs in the discussions, as well as the municipalities. It is also working more on access of refugees to education. The latter also received funding from the Asylum, Migration and Integration Fund (AMIF) to promote local integration. The example of Lithuania demonstrates that there are possibilities to advance local integration and to work with municipalities directly.

⁴³ Ibid.

⁴⁴ UNHCR, UNHCR Recommendations to Norway on strengthening refugee protection in Norway, Europe and globally, January 2021, p.11.

⁴⁵ UNHCR, UNHCR Recommendations to Denmark on strengthening refugee protection in Denmark, Europe and globally, January 2021, p.10.

⁴⁶ RRNE MYMP Regional Chapeau, 17 October 2019, p.8.

Emergency response

48. In June 2021, the Lithuania-Belarus border began to experience a significant and unexpected change, namely the steady and increasing arrival of migrants and refugees – mainly from Iraq, but also from Syria, Afghanistan, the Democratic Republic of Congo, Cameroon and several other countries – trying to reach the EU via Belarus. While Belarus has faced accusations of instrumentalizing the migration flows,⁴⁷ the EU countries concerned had responded by building fences, significantly increased border patrols, push backs, and declared a state of emergency along border areas, thus limiting independent humanitarian assistance organizations from entering the area. UNHCR followed these developments with great concern, particularly the reported pushbacks and called for immediate access to those affected. Furthermore, it has had to invest significant attention and resources in engaging relevant authorities to explore options for persons stranded at the border.⁴⁷

As the crisis continued, the RNB had to rapidly reprioritize its work and invest in its support role to Lithuania and other countries to deal with the border situation. UNHCR's Global Strategy commits the Organization to invest in building emergency preparedness and response capacity of national actors.⁴⁸ In line with that Strategy, the RNB had offered support with contingency planning training to some of the affected countries, yet it was not seen as a priority at the time. While the number of arrivals in Lithuania was low in overall terms, it nevertheless constituted a significant increase compared to numbers that Lithuania received in the first seven months of 2021 (about 100 migrants and refugees). The figure increased to approximately 100 per night as of July 2021 onwards. Given the high political significance of the influx, the Baltic sub-region suddenly became an important political and humanitarian priority in Europe for both the RNB and the RBE.

49. Specifically, the main requirement for the Lithuanian authorities was to urgently improve their reception capacity. Lithuania's reception system was not prepared to receive such high numbers and it struggled to provide basic services for new arrivals. According to KIs, the EU focused its efforts on improving the quality of reception facilities as well as increased the number and capacity of social workers. UNHCR took on a support role, by providing for example, complementary training for social workers. UNHCR's advocacy efforts and policy dialogue with the Government focused on access to territory, quality of asylum procedures and improving the reception conditions for refugees and migrants and their overall treatment. It was also able to improve the management of data relating to the unfolding crisis. The RNB in stepping up the support to governments on the crisis response meant however that other important aspects of its work, such as its work on solutions and the regular legal protection issues, were deprioritized.

⁴⁷ IOM and UNHCR, UNHCR and IOM shocked and dismayed by deaths near Belarus-Poland border, 21 September 2021, <https://www.unhcr.org/news/press/2021/9/6149dec74/unhcr-iom-shocked-dismayed-deaths-near-belarus-poland-border.html>

⁴⁸ UNHCR, Strategic Directions 2017-2021, <https://www.unhcr.org/5894558d4.pdf>, p. 20.

The following issues/activities received less prioritization of UNHCR in the period 2017-2020:

Statelessness

50. UNHCR's Global Strategy commits the Organization to mobilize global support for the campaign to end statelessness by 2024 and for that support to yield concrete results.⁴⁹ The sub-region that RNB oversees hosts five countries that are specifically listed in the Global Strategy and Implementation Plan for the Campaign to end Statelessness 2020-2021: Latvia, Denmark, Estonia, Finland and Lithuania. UNHCR had foreseen efforts to advocate for strengthening the statelessness registration procedure in Denmark and Finland through the provision of technical advice and protection advocacy; for the development of a status determination procedure in Estonia and Lithuania, as well as for strengthening the status determination procedure in Latvia. Furthermore, in both Denmark and Estonia, UNHCR had indicated its intention to work on advocating for a further strengthening of safeguards in nationality laws.
51. The RNB's statelessness initiatives in the sub-region have been highly relevant and appropriate, taking into consideration key drivers of statelessness and contextual factors. They were also highly appreciated by UNHCR's counterparts, who felt that they were valuable, though insufficient to significantly create the required momentum to realise the RNB's goals. Due to limited capacity, some of the requests for support on particularly challenging statelessness related issues (e.g., the consequences of the declaration of the Statehood by Palestine on the situation of statelessness of Palestinians) may not have always been responded to by the RNB and UNHCR in a timely manner. Moreover, considering its very limited resources (the RNB had no dedicated staff but relied on consultants), progress was slow and irregular.
52. Despite resource constraints, the RNB undertook a mapping of the statelessness issues in Sweden and produced important recommendations. Although Sweden has been a State Party to the 1954 Convention since 1964, numerous provisions in the Convention have not been included in Swedish legislation nor applied in practice.⁵⁰ It also carried out a mapping of the statelessness situation in Norway, considering that Norway does not have a dedicated statelessness determination procedure. Little was known about the situation of stateless children. UNHCR recommended to Norway that it introduce provisions in its national law, allowing for the automatic granting of nationality to children born in Norway.⁵¹

Engagement of POC and accountability to affected populations (AAP)

53. Like other humanitarian organizations, UNHCR is committed to putting in place mechanisms that ensure that communities are meaningfully and continuously involved in decisions that impact their lives.⁵² Furthermore, UNHCR's global policy and accompanying guidance on Age, Gender and

⁴⁹ Ibid, p.19.

⁵⁰ The lack of a definition of a stateless person in national law, coupled with the lack of common guidelines with criteria and procedural standards for its applications leads to a risk that an individual's citizenship status is assessed differently by respective authorities. (D2.63, p.54). UNHCR's recommendations included the following: Exploring the possibility of establishing a system which enables a synchronization of recordings and updates relating to a person's citizenship status in the respective registers (D2.63); the establishment of a statelessness determination procedure (ibid) and the granting of a residence permit to those persons determined by Sweden to be stateless (RNB, Mapping Statelessness in Sweden, 2016, <https://www.refworld.org/pdfid/58526c577.pdf>, p.55).

⁵¹ RBE, Mapping Statelessness in Norway, 2015, <https://www.refworld.org/pdfid/5653140d4.pdf>, p.45

⁵² UNHCR, Accountability to Affected Populations, <https://emergency.unhcr.org/entry/42554/accountability-to-affected-people-aap>

Diversity (AGD) require its operations and staff to understand and analyse the impact of personal characteristics on people's experiences of forced displacement and statelessness in order to inform an effective response.⁵³ While the RNB has reflected on involving asylum-seekers and refugees and had intended to strengthen its engagement with them through a dedicated exercise (that it intended to carry out and for which a concept note was written), it has not dedicated sufficient time and resources to carrying out this commitment. For the most part, there has been only sporadic contact between the RNB and asylum-seeker and refugee POC in the sub-region. These were initiated as one-off events within the context of specific time-bound studies, such as the mapping that UNHCR commissioned on voluntary refugee organizations in Sweden. Some of the studies that UNHCR had conducted on the integration of POC, such as the above-mentioned study, demonstrated that POC organizations were insufficiently represented and engaged by public institutions and NGOs working on protection and integration issues.

Other global priorities: GBV, ending detention and child protection

54. While UNHCR has a global Gender-Based Violence (GBV) policy that aims at reducing the risks of GBV for all POC and to ensure that all survivors have adequate and timely access to quality services in all UNHCR's activities and operations,⁵⁴ it is unclear how it was factored into the planning in the RNB. At the same time, it is clear from the literature review and KIIs, that while RNB recognized their importance, it had limited capacity to address these priorities.
55. The same applies to its intention to strengthen cooperation with strategic partners on detention monitoring which it included in its MYMP, guided by UNHCR's Global Strategy on Ending Detention.⁵⁵ It is not clear from the structure of the office to what extent it has been able to implement the detention policy. This includes a detention monitoring strategy adapted to the particular context and challenges, and to preventing events of unnecessary detention, as well as ensuring that the conditions of detention, where necessary and unavoidable, provide for humane and dignified treatment of all detainees.⁵⁶
56. Finally, while the RNB had identified clear needs regarding child protection, such as the fact that reception systems do not adequately meet the basic needs of newly arrived children due to the absence of specialized facilities and the overall limited child-friendly processes, the RNB did not have the capacity to substantively work on this issue.

⁵³ Accordingly, AGDM approach should guide all aspects of work, informed by the imperative of informing and promoting gender equality and empowering women and girls and the best interest of the child through: AGD inclusive programming, participation and inclusiveness, feedback and response, organizational learning and adaptation, gender equality and commitment to women and girls and communication and transparency (UNHCR Policy on Age, Gender and Diversity, 2018, <https://www.unhcr.org/5aa13c0c7.pdf>, p. 3). It is not clear how it is reflected in work of RNB.

⁵⁴ UNHCR, Policy on the Prevention of Risk, Mitigation, and Response to GBV, 2020, <https://www.unhcr.org/5fa018914.pdf>, p.3.

⁵⁵ The Strategy aims to: 1) End the detention of children; 2) Ensure that alternatives to detention are available in law and implemented in practice; and 3) Ensure that conditions of detention where detention is necessary and unavoidable, meet international standards (UNHCR, Policy on Detention Monitoring, UNHCR/HCP/2017/7, p.7).

⁵⁶ UNHCR (2015). Policy on Detention Monitoring. UNHCR/HCP/2015/7.

3.2 Contribution of MYMP to the prioritization process

While the strategic planning approach facilitated by the MYMP (2018-2021) has been assessed as helpful, it has not had a far-reaching impact on guiding the prioritization of the RNB in the period that the evaluation covered. It is therefore too early to appreciate the full ramifications of the MYMP.

57. The drive of the MYMP to define an overall vision with long-term outcomes was deemed useful by UNHCR staff for the objective of prioritization. These efforts culminated with the adoption and roll out of the COMPASS tool from 2021 onwards⁵⁷ – UNHCR’s new planning, budgeting and monitoring system, which takes a longer-term perspective to solutions.⁵⁸ Where MYMP plans were stored, they did not yet allow for each country’s to be seen and captured individually. RNB and other offices prepared the annual plans outside of the COMPASS system (offline) and uploaded these to the system later. They also prepared detailed implementation plans and budgets offline which could not be uploaded to the system. The fact that all aspects of the plans could not be revised, viewed and stored in the same location limited the ability to leverage the full potential of this planning tool. Moreover, and in what constitutes a general limitation of the MYMP that also applies to the RNB, the MYMP tool, with its current standards and indicators, is not yet tailored to the needs of smaller UNHCR operations that do not foresee an extensive and direct implementation in many sectors.

58. The MYMP approach and guidance that underpinned MYMP did not adequately account for how to easily and coherently capture fundamental changes in circumstances in the operational environment. While the MYMP approach is only as good as the input provided and the analysis produced by the RNB and other country offices, the system and guidance in place at the time was viewed as unwieldy when having to absorb multiple simultaneous changes. The MYMP approach may have been viewed as more useful had there been individual plans submitted for each country, providing more contextually relevant information and analysis that could then feed into structured monitoring and systematised evidence to record and inform institutional decision making and reflection. Detailed planning and implementation documents for each country within the MCO were not integrated into the online COMPASS planning module, which created friction and potential breaks in institutional memory when new rapid planning is required after significant contextual changes in one or a small set of countries within an MCO.

“Where it [MYMP] does not work well is the monitoring of sudden changes. So, Lithuania. What does that mean for MYMP? In more operational countries, we were more scratching their heads when the government policy changed radically.” (Quote from KII)

59. Prioritizing for the more “stable” parts of the operational environment was more straightforward and therefore well supported by the MYMP 2018-22 process. This is because the RNB had anticipated policy changes that were introduced in Denmark, Finland, Norway, and Sweden, foreseeing that these may have an impact on the Baltics. The multi-year approach has allowed UNHCR to identify trends across several years more clearly, and thereby allow causes and

⁵⁷ However the period of this roll-out fell out of the scope of this evaluation, and this development could not be assessed.

⁵⁸Ritu Shroff, COMPASS — why our new planning system will make a bigger difference in the lives of people forced to flee, <https://medium.com/unhcr-innovation-service/why-our-new-planning-system-will-make-a-bigger-difference-in-the-lives-of-displaced-people-4258612305ca>.

consequences to be linked more easily. One example is that the number of spontaneous arrivals may lead to further restrictions in the enjoyment of rights in these countries. This would therefore require increased strategic border monitoring, in cooperation with partners (e.g., specialist NGOs, and the International Organization for Migration (IOM)).

60. Furthermore, the RNB identified the goal of maintaining asylum standards in the sub-region and preventing them from deteriorating further. Moreover, the RNB has also decided to prioritize the cross-fertilization of good practice in reception given that a number of countries (Estonia, Latvia, Lithuania) have limited possibilities for migrants and refugees to access psychosocial assistance, as well as limited access for persons with specific needs to recreational activities.
61. Support to integration was also prioritized. In part due to the RNB's realization that the continued shrinking of the asylum space without a corresponding improvement in integration would have negative consequences, particularly in the Baltic region. The MYMP also referred to child protection, and the intention to strengthen partnerships⁵⁹, although it was not clear how that priority was to be translated into practice.

3.3 Support of MYMP to planning and implementation ability of RNB

The mandatory inclusion of a theory of change in the regional strategy has resulted in a stronger and more articulated protection strategy to inform RNB's activities. RNB's commitment at senior level to the MYMP process, as well as the support it has received from the Bureau, has allowed the RNB to come up with a strong sub-regional plan. At the same time, given the template and the structure of the MYMP, national specificities are not as easily visible in the same way it would be for a single country office.

62. It is premature for the full impact of the move to the MYMP to be gauged at this time. As MCOs were given the option of developing a single results framework for the entire sub-region, the RNB presented one results framework across the eight countries under its responsibility. Despite this adjustment, a strong risk assessment element to the MYMP, as well as the spelling out of different political challenges was missing. Those UNHCR staff interviewed acknowledged that the RNB had not carried out a formal in-depth discussion for each country operation during the planning process.
63. Furthermore, as with other offices, the RNB still had to review its plans on an annual basis and the documentation of performance milestones continued to be cumbersome. The MYMP process also did not guarantee automatic continuation of partnerships, as funding constraints strongly influenced how partnerships are managed. Finally, the RNB did not engage the POC directly in their planning, though this was a requirement, and there were no repercussions for this not taking place. Though the RNB had consulted with some key stakeholders at the beginning of the MYMP process in 2017, this consultation was neither regular, nor continuous.
64. According to KIs from UNHCR, RNB had a clear advantage when it came to the MYMP as it already had gone through a pilot project. Senior management was therefore familiar with the process and did not experience any significant challenges with the official roll-out. The office had

⁵⁹ UNHCR RNB. Multi-Year, Multi-Partner (MYMP) Protection and Solutions Strategies 2018-2022, UNHCR Northern Europe.

also already carried out the stakeholder mapping exercise. Consequently, the RNB reviewed the results of the MYMP and took into consideration the additional feedback it obtained from the Bureau and adjusted the plan accordingly. At the same time, and given the turnover of staff at the RNB, many newly recruited staff did not work with the MYMP on a daily basis.

3.4 Ability of RNB to deal with emerging (future) challenges

In the future, UNHCR is likely to face multiple scenarios of population movements in Europe and the sub-region the RNB covers that will be high profile, irrespective of the size of these movements. Additionally, the RNB is likely to have to manage and respond to pressures to reduce protection standards. While the RNB has responded appropriately to the policy changes in the sub-region, its capacity to respond on multiple fronts simultaneously in an effective and timely manner may be challenged.

65. The RNB has been confronted with a scenario of multiple population movements in the sub-region. Such a scenario is likely to continue in the future. Some of these movements can either be sudden or slower to form into a critical mass. Regardless of how easily these population movements will be to anticipate or predict by UNHCR, they will almost certainly carry a high political value, requiring UNHCR to carefully define its engagement.
66. States in the sub-region will continue to require support to ensure adequate reception arrangements as well as the availability of meaningful prospects for local integration. Challenges on these afore-mentioned fronts, coupled with challenges in communication and outreach, as well as in having a timely and user-friendly access to vital information for persons of concerns regarding the asylum process; will lead to the likelihood for POC to feel isolated and to pass undetected. Those that are particularly vulnerable and with specific protection concerns will suffer the most as they face increasing barriers to seek assistance and protection.
67. The RNB has been confronted with a number of policy moves undertaken by some governments to review and challenge the high protection standards in the Nordic region. The risk of a continued “race to the bottom” when it comes to protection standards remains significant and will require the RNB’s ongoing attention. Within the sub-region, and Europe more widely, debates on externalization will continue to evolve. This will require coherent and joined-up analyses across UNHCR’s operations to ensure effective advocacy. Furthermore, while responding to pronounced individual examples of this tendency, as already done effectively by the RNB, going forward, the RNB may also be required to invest further capacity and energy in less noticeable or incremental policy and legal challenges to the rights of asylum seekers and persons of concern. As the RNB and RBE continue to position themselves, they should consider focusing on ensuring that there is sufficient capacity within the RNB, to address these issues – all while being mindful of the interest of governments in the region to remain in the lead as well as their capacity to be the first responders to any emergency influxes. The RNB will need to refine advocacy efforts and legal tactics and the building of and strengthening of partnerships with civil society actors.
68. Specifically, much of the RNB’s capability to navigate these challenges has depended on its ability to prioritize wisely and leverage partnerships. It has also depended on the RNB’s capacity to share good practices, in addition to relevant technical and legal expertise, all in a timely manner. The

need to prioritize in this way will continue to be important if UNHCR wants to influence the development of viable asylum systems in countries that are still in the process of strengthening these areas, such as Lithuania.

69. As part of the need to prioritize, the RNB has been able to carve out a specific niche for its involvement in unfolding emergencies, such as the one at the Lithuania-Belarus border. It has done so by successfully focusing on the provision of technical assistance and advice to the Lithuanian authorities and the promotion of a more active role in the response by the Lithuanian Red Cross. Depending on how long the crisis at the EU's external border lasts, as well as the ability and willingness of the EU to step in at the political and operational level, UNHCR may find itself pressured in the future to respond operationally and step-up its involvement in delivering assistance.

The specific impact of COVID-19 on the RNB

UNHCR recommended that States adapt their reception and asylum systems to the COVID-19 pandemic, including by implementing the following measures: medical screening or testing, simplifying registration processes, enhancing hygiene measures for in-person registration, written or electronic registration submissions, and automatizing the issuance and/or extension of documentation. In Denmark, quarantine was only applied when medically indicated.

Several good practices by States during the pandemic have emerged and were subsequently welcomed by UNHCR. These included the following: in Sweden, the number of people was reduced in some of the collective facilities to decongest and lower risks of spreading the disease. In Denmark, residents are eating meals in shifts to increase physical distancing. Asylum interviews were also cancelled and rescheduled if an applicant or legal representative is unable to attend due to illness. Moreover, in Norway, the national asylum authority has suspended all interviews while it is assessing the possibility and feasibility of conducting asylum interviews remotely. In Latvia, asylum interviews are conducted using digital tools.

UNHCR had also recommended community engagement and risk education, inclusion of refugee asylum-seekers, stateless persons and IDPs in risk education and information efforts related to COVID-19, as well as using multiple channels of information, and the engagement of refugee, the IDP and stateless community in disseminating and evaluating the information campaigns. In Norway, information is made available in 24 languages via the Government website.

The pandemic has also contributed to a change in the way RNB engaged with communities of POC. Given the eagerness to ensure that POC had access to information about COVID-19 and how to avoid infection in a language they could understand, RNB produced multilingual information, and enquired about the channels of information that POC were using.

In terms of internal working arrangements, the pandemic undoubtedly presented challenges, but it has also offered numerous opportunities; there were more opportunities for meetings, networking and working together online. RNB staff also remarked that they were able to participate in more meetings with external interlocutors, such as on resettlement, as the de facto meeting modalities shifted online. However, the absence of travel to the countries in the region was missed by interlocutors in their efforts to stay up-to-date and build and maintain networks

70. Some of the challenges described here have required the RNB to communicate clearly and publicly in a sustained manner with several different actors, including host governments, wider society and the POC themselves. Unfortunately, this has not been the case. Most interlocutors

interviewed for the purpose of this evaluation either did not know how the RNB prioritized its work streams relating to its overall protection and solutions work, or if they were aware, they felt that the RNB only partially addressed the most compelling priorities. Only 25 per cent of those surveyed, felt that the RNB was catering to unforeseen emergencies or fundamental changes in circumstances. Particularly in the area of protection, more than a quarter of the survey respondents (27 per cent) felt they did not know whether UNHCR was able to address the most pressing issues in that regard. An equal number of respondents felt that UNHCR may have only partially done so.

Chapter 4: Operational structure and resources of UNHCR in the Nordic and Baltic Countries

71. This chapter discusses the second evaluation question; how fit-for-purpose the operational structure and resources are for the RNB to deliver on its priorities. This includes the appropriateness of the UNHCR structure in the sub-region, also in light of the decentralization process, in addition to the adequacy of the financial and current resources of the RNB. Furthermore, this chapter looks into the internal coherence of UNHCR by assessing the support to the RNB from the RBE and Headquarters and the appropriateness and use of organization-wide tools and processes, such as first observations how the RNB implements the Results-Based Management approach.

4.1 Appropriateness of the UNHCR structure in the Nordic and Baltic countries

The RNB has so far not found the optimal structure to deliver on its priorities and to deal with emerging challenges. Ad-hoc attempts hamper a strategic approach towards in-country presences which could match regional priorities, opportunities at country-level and risk analysis. Decentralization has not solved the challenges posed by the RNB's current structure.

New architecture

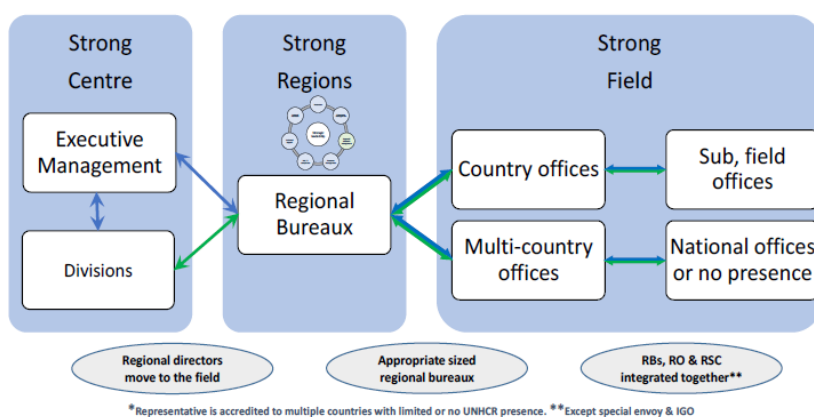


Figure 4: New architecture (Source: UNHCR (2018), *Repositioning UNHCR in the field: Key considerations to guide decentralization and regionalization*, 27 September 2018)

72. The decentralization and regionalization processes of UNHCR, as part of its overall transformation process, had the aim to strengthen the Organization and to better position it to deliver on its mandate. Explicit reference is made in the policy of the Standing Committee of the Executive Committee of the High Commissioner's Programme to the fact that in some operations, multi-country offices might be established and/or continued.⁶⁰ Whereas the logic of decentralization to strengthen decision-making at the country level and to enhance flexibility might be clear for country offices, decentralization brought about little change for some multi-country offices such

⁶⁰ UNHCR (2019). Executive Committee of the High Commissioner's Programme, Standing Committee. Update on UNHCR Reform. EC/70/SC/CRP/22, 30 August 2019.

as the RNB⁶¹. The evaluation demonstrated that the logic of having multi-country offices is not necessarily questioned by UNHCR staff as a principle, but that its implementation can result in challenges for the execution of its mandate.

73. The sub-regional character of the area overseen by the RNB, connecting two regions in Northern Europe, namely the Nordic and Baltic states, adds another organizational layer. The main arguments for merging these two regions under one multi-country office were twofold: 1) the constellation was in place before; and 2) the Baltic states orient themselves towards the Nordic countries and pay close attention to their practice in the area of asylum and solutions more than to states in Central Europe. A third consideration was to reduce costs. Cross-fertilization was therefore seen as both a possibility and an objective that UNHCR could support through the sharing of good practices. The similarities in the protection environment between the two sub-regions were clearly not calling out for a multi-country office, on the contrary, their differences are broadly acknowledged. Ambiguity is thus an inherent aspect of the RNB, causing practical challenges in terms of prioritization and focus of staff efforts.
74. In addition, decentralization aimed to better reflect regional challenges and opportunities. Yet, the RNB could not substantially profit from decentralization in terms of enhanced resources and decision-making power despite its responsibilities to represent the sub-region and to offer analysis at that level. The survey results confirmed that the decentralization process had not necessarily positively affected the ability of the RNB to fully leverage these opportunities and to fully embody the role expected of it.

“Not sure there is much difference compared to five or six years ago.”

“Decentralization has not helped RNB’s operations significantly - the processes and authorities are focused on the relationship between a country office and the RBE - RNB is an 8-country-office without the adequate resources.” (Comments in the staff survey)

75. Indeed, the key challenge for the RNB remained how to cover its geographical responsibilities within available capacities and the existing resource envelope, despite the heterogeneity of the sub-region. This is a second integral balancing act for the RNB. Many external interlocutors who were not particularly aware of these challenging realities for the RNB were confused by what they perceived as “inertia” by the RNB. With the Regional Bureau remaining in Geneva, a differentiation between the RBE and the Divisions at Headquarters is not always clear for country staff and external partners. External counterparts continued to call the RNB the Regional Office, indicating limited understanding among non-UNHCR staff of the structural changes. Those external stakeholders who were aware of the intricacies of the decentralization process, expected that the decentralization would result in the RNB assuming more responsibilities with regards to managing UNHCR’s mandate in the sub-region and becoming more “hands-on”, which did not materialize.
76. Furthermore, the benefit of having country-level presences that would report to the RNB in Stockholm remains the topic of continuous reflection and differing opinion. In principle, multi-country offices are only established where UNHCR lacks country presence.⁶² In Northern Europe, the aim is to achieve a balance of having enough in-country staff to permit sufficient leverage for implementation of UNHCR’s mandate and cooperation with key partners in-country, without

⁶¹ A multi-country office (MCO) is a UNHCR presence with responsibility for UNHCR engagement in more than one country. In addition to the host country where the office is located, the countries within the area of operation of an MCO may include one or more national office in nearby countries. An MCO may also cover any UNHCR interests in countries in which UNHCR has no presence. (UNHCR/AI/2021/01 – Annex F)

⁶² UNHCR (2018). Repositioning UNHCR in the field: Key considerations to guide decentralization and regionalization, Internal/Restricted, 27 September 2018.

making the structure too thin. The evaluation confirms the assumption of the decentralization process that those who are closest to the people UNHCR serves, are best placed to understand the needs and make decisions.⁶³ One disadvantage of having a presence at individual country level is that staff manning these offices are expected to comply with all regular reporting requirements which can be heavy, especially if the field-based team is small.

77. Presence at individual country level have clear advantages in emergency situations, including the unfolding situation at the Belarus-Lithuania border, or developing situations requiring ‘eyes and ears’ on the ground, like in Denmark. For example, the presence of UNHCR staff in Copenhagen enhanced the cooperation with other partners in the country, especially in terms of advocacy and increased UNHCR’s credibility. The recent events in [Lithuania](#) which quickly spiralled into a high-profile political emergency highlight the need for a larger presence of UNHCR staff in-country. At the same time, having a regular presence in-country or through missions -even if inadequate- has allowed UNHCR to network and to establish partner relationships that could be easily tapped into when UNHCR scaled up its efforts in response to the evolving situation. These relationships also opened doors to UNHCR with the government (e.g., during the UNHCR Regional Representative’s first visit to Lithuania following the “crisis”). In addition, having UNHCR staff on the ground enabled the Organization to be part of the (small) UN family in the country thereby leading to enhanced cooperation and joint messaging, especially when sharing premises. For partners, it was perceived to be convenient to have UNHCR staff on the ground at all times and to be able to meet informally as well. However, with the situation in Lithuania continuing to evolve, internal and external interviewees deemed it important for UNHCR to have a more dedicated staff presence in the country.
78. External actors have expectations of whether UNHCR was present on the ground, how often and in what shape and form that factor into discussions on the structure of the RNB. Yet, these expectations are not uniform, not even within the same categories of stakeholders. These opinions depend very much on previous experience and collaboration they had with UNHCR, including through personal contacts. For example, counterparts in Iceland felt the need for more direct involvement or presence of UNHCR in-country. For Latvia, it was argued that the weaker capacities of partners called for a physical focal point. However, in other countries, like [Sweden](#), the “value” or impact that was felt as a result of UNHCR’s presence in the country was questioned, especially by those stakeholders who deal mainly with UNHCR Geneva and have less interaction on domestic issues. On the other hand, having the RNB located in Stockholm also creates expectations in terms of the attention that UNHCR would be expected to give to Swedish issues and priorities. Other Nordic countries, like [Norway](#), adopt a more pragmatic approach, whereby the presence of the RNB nearby in Stockholm is appreciated, but they view that the most essential factor in determining where and when to maintain a physical presence is the availability of resources, capacity and UNHCR’s responsiveness, as opposed to geographical proximity. Having dialogue partners in Brussels or Geneva would be equally acceptable. Regular exchange and visits remain key for all countries, but an actual in-country presence in more stable situations needs to be seen in a cost-benefit context on top of a proper risk analysis.

⁶³ UNHCR (n.d). Quick Guide to UNHCR’s Regionalization and Decentralization Process.

4.2 Appropriateness of financial and human resources of the RNB

The current financial and personnel resources of the RNB challenge the effectiveness and efficiency of the office in light of its discrepant geographical responsibilities. There is an imbalance between the RNB’s responsibilities and available capacities. The division of tasks within the RNB are a constant dilemma and the size of the office makes it even more dependent on the right profile of staff members.

79. The question as to whether the RNB has adequate resources to implement its priorities revealed a clear division among UNHCR staff and external stakeholders.⁶⁴ In order to properly understand the reasons for that, it is important to break down the concept of resources.
80. The evaluation was not able to assess the appropriateness of financial resources that the RNB had in objective terms. Views differed depending on which staff were interviewed as to whether UNHCR Operations in the sub-region received sufficient financial resources in the assessed period of 2017-2020.⁶⁵ There was, however, general agreement that given the global requirements and needs overview, the RNB would not receive any more resources and would have to budget within the existing envelope. In addition to the amount as such, the topic of financial resources also needs to be situated in the context of financial decision-making within the Organization. The UNHCR Guide to Decentralization and Regionalization noted already that the “*allocation framework is heavily centralized and has been a long source of frustration and confusion for colleagues in the field.*”⁶⁶ Regional Bureaux’ Directors determine the operational planning envelopes on an annual basis.⁶⁷ The operational level received enhanced flexibility within field operations by allowing certain reallocations throughout the year.⁶⁸
81. Yet, the challenge remains how to cover a wide set of priorities within this set budget. The work on statelessness, for example, has suffered from limited resources with the global UNHCR budget for this part of its mandate remaining static since 2012. This is despite the fact that stateless populations covered by the RNB grew by 25 per cent in the period 2012-2019.⁶⁹ The RNB has not had a dedicated staff position on statelessness alongside its protection and legal positions, and continues to rely primarily on consultants to cover the work on statelessness. In addition, the protection environment has changed since 2017 and developing situations, like Denmark and Lithuania, have absorbed more attention of staff at the expense of other work streams, thereby requiring a reprioritization and limiting the possibility to reclassify one of the associate legal offices positions to focus on statelessness.
82. Resources also depend on the profiles of the staff members operating in the Nordic and Baltic countries. In smaller offices like the RNB, individual staff skills and qualifications become even more important to effectively implement UNHCR’s mandate. The RNB, however, has to balance

⁶⁴ In the survey for UNHCR staff members, 50% agreed and 50% disagreed with the following statement: “Both in terms of financial and personnel resources, how adequate is the current resourcing of the RNB?”

⁶⁵ The assessment of adequate staff and financial resources in 2022, thus after the start of the conflict in Ukraine, was not part of this evaluation.

⁶⁶ UNHCR (2018). Repositioning UNHCR in the field: Key considerations to guide decentralization and regionalization, Internal/Restricted, 27 September 2018

⁶⁷ UNHCR (2021). Administrative Instruction on COMPASS Get Results: Implementation Planning for 2022. UNHCR/AI/2021/08, 16 July 2021.

⁶⁸ UNHCR (2019). Administrative Instruction on Detailed Planning and Budgeting for 2020. UNHCR/AI/2019/9, 5 November 2019.

⁶⁹ UNHCR (2021). Evaluation of UNHCR-lead Initiatives to End Statelessness. ES/2021/03, May 2021.

differences in terms of language and the extent to which there is a favourable protection environment for persons in need of international protection within its area of responsibility. The Representation needs to be able to cover thematic specializations, such as protection, legal issues and statelessness expertise, in addition to having language proficiency and country knowledge. Often, one position needs to combine multiple areas of expertise. The combination of professional, technical and language skills, coupled with the nationality of staff, are important factors that have to be present in order to facilitate the implementation of UNHCR's mandate and to build sustainable partnerships. However, it is a difficult formula to achieve across the eight countries it covers for an office with little over 20 staff members divided across four units (administration unit, protection unit, communications unit and external relations) and across three locations (Stockholm, Copenhagen and Vilnius).

83. Furthermore, the requirements for staff are changing, from requiring legal experts advising on rather stable contexts, to the need to have staff with advocacy experience (cfr. The externalization debate in Denmark) and/or emergency background (cfr. Crisis in [Lithuania](#)). The shift in emphasis on integration, including in Finland and the Baltics equally requires personnel experienced in the engagement of refugee communities and refugee organizations. Broad skillsets like these contrast with a) the comparatively junior level of staff positions in the RNB: and b) staff turnover hindering the growth of institutional knowledge and know-how on how to deal with stakeholders in this environment. A clear element impacting positively on the performance of a staff member and of the RNB overall, is when a staff member has already established expertise and networks in the region before becoming a UNHCR staff member. This is demonstrated by the personal relationships of the RNB's Integration Officer which benefits the work of the RNB overall.
84. The RNB has suffered from slow recruitment processes and vacant positions for an extended period of time due to a combination of various reasons: heavy recruitment policies, COVID-19 delays, availability of internal candidates and the requirement to undertake checks for external candidates. Having extended gaps in the staffing structure hampered efficiency and added to the burden on staff in place who have to take on additional responsibilities. For example, the additional staff member to support the response to Lithuania only arrived in January 2022, including because of delays due to COVID-19, but demanding that other staff, including staff working on [Sweden](#) for example, partly set aside their core responsibilities to focus on the emergency in the meantime.
85. Internal coherence also depends on how responsibilities among individual staff members are divided within this wide set of different thematic and geographical tasks. Such task division is closely linked with the structure of the office. In this regard, the RNB encountered a number of difficulties in the evaluation period to establish and maintain a functioning internal organizational structure. The country focal point system could not work since some positions were (temporarily) vacant (in Latvia and [Norway](#)). When positions are unfilled, they leave a significant gap in programme delivery and in the coherence of the RNB's functioning. For example, a senior external relations officer was no longer in place in 2021. But also fully staffed, there are still challenges, including a weak representation of mid-level staff positions. Furthermore, and given the difference in priorities for the eight countries, as well as differences between the two sub-regions, an automatic division between country focal points covering these countries and sub-regions followed, enhancing a siloed approach.

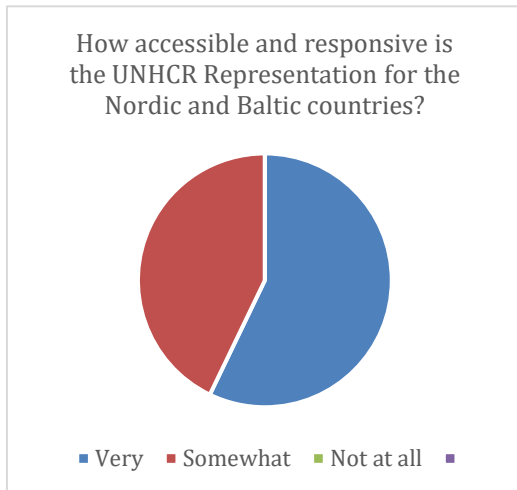


Figure 5: Survey responses from government authorities

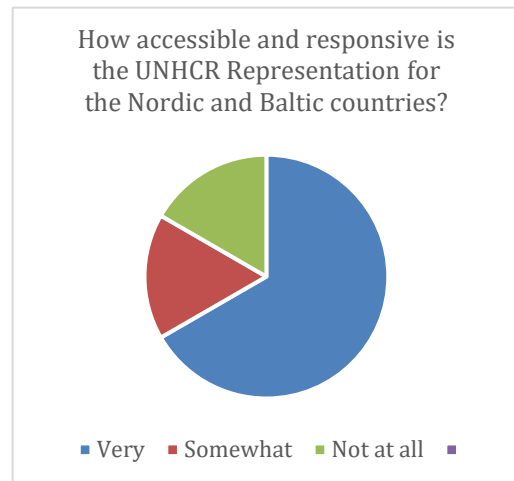
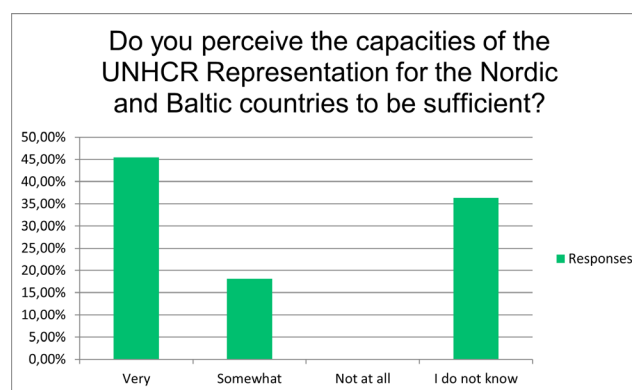


Figure 6: Survey responses from civil society

86. Finally, while RNB's reputation is good, external stakeholders have limited knowledge about its actual capacities. The evaluation results indicate most external stakeholders deemed the capacities of the RNB insufficient or were unable to assess this aspect, particularly among partners from civil society and academia. Nevertheless, the subject-matter expertise and information-sharing from UNHCR were particularly appreciated. Three additional notes on the survey results need to be made though.⁷⁰ *First*, there is a difference between the perception of governmental authorities and civil society organizations, with the latter being slightly more critical. *Second*, there are a few respondents who were openly negative about the capacities of UNHCR. *Third*, the survey indicates that a significant part of the respondents were not able to answer that question, indicating a limited knowledge regarding the capacities of UNHCR in the region. This observation also needs to be linked to understanding the expectations of stakeholders towards UNHCR, an issue which is explored in the next chapter.

Figure 7: Responses from governmental authorities



⁷⁰ The survey took place after a period of less direct interactions between the RNB and stakeholders due to COVID-19 contact restrictions. It can not be excluded that this experience has influenced the results.

Figure 9: Responses from partners and civil society

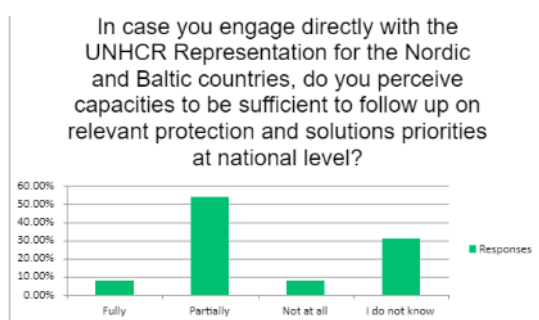
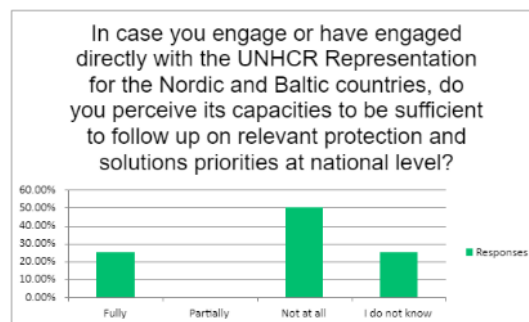


Figure 8: Responses from partners in academia



4.3 Support to RNB from other UNHCR entities

Overall, the relationship between RNB and other entities worked well, but is hampered by the lack of a clear understanding of division of responsibilities with UNHCR HQ and RBE and lack of an appreciation of the capacities of the RNB to achieve these. Activities, like communication, public information and donor management, affect functions of both the RNB, RBE and HQ, but the division of roles is not necessarily well understood. Exchange between other country offices within the wider European region could have been stronger.

87. The RNB is just one layer of UNHCR as an organization. It is clear that internal coherence is a key element in enhancing the effectiveness of UNHCR operations in the Nordic and Baltic countries. While the change process is ongoing, a number of observations could be made in terms of the support for the RNB by other UNHCR entities in terms of guidance.
88. To start with, the lack of clarity in terms of task division continues to affect cooperation despite the fact that regionalization was intended to overcome this blurring of lines and confusion among staff.⁷¹ On paper, the policy seems to be straightforward. However, in practice, there continues to be confusion, particularly with external interlocutors. Based on UNHCR's reforms, regional bureaux have the responsibility for strategic planning and partnerships, to elaborate regional protection policies, for external engagement and to offer operational support. The latter includes assistance to country offices with a wide range of services such as human resources, supply chain management, financial controls and information and communications technology.⁷² Yet, responses received as part of the evaluation referred to continuous confusion. From the interviews carried out by the evaluation team, support from the Bureau was mainly understood in terms of thematic and technical guidance. Areas where the Bureau and RNB worked well, and where the division of responsibilities was clear included resettlement and the development of related quota. The Division of International Protection (DIP) took the lead on resettlement issues. The RNB led on national asylum issues in countries such as Sweden in close coordination with the UNHCR regional representations for the EU based in Brussels and HQ. Work on statelessness was shared between RNB and RBE. This was less so with regard to other thematic areas, as it was not always clear for RNB staff how responsibilities were divided between the Bureau and HQ.

“The office is reporting regularly, and information shared smoothly. The main challenge could be the multiple interlocutors on both sides and the potential for parallel communication channels.”
(Comment in the staff survey)

⁷¹ UNHCR (2018). Repositioning UNHCR in the field: Key considerations to guide decentralization and regionalization, Internal/Restricted, 27 September 2018.

⁷² UNHCR (2019). Executive Committee of the High Commissioner's Programme, Standing Committee. Update on UNHCR Reform. EC/70/SC/CRP/22, 30 August 2019.

89. The relationship between RNB, RBE and HQ was also largely seen as “one way” rather than genuinely two-directional. When asked how staff perceived relations with other entities, one main concern was the requests for information, data and analysis. Staff referred to double requests, i.e., the same or similar requests from HQ and RBE. As such, information requests were often perceived as a burden by the relatively small RNB team. On the other hand, HQ staff did not always see the need to communicate with the RNB through the RBE, preferring instead to contact RNB or the country presence directly.

“Sometimes we get too many requests at the same time or the same request both from DIP and RBE”

” Receiving too many newsletters / reports. Division of tasks unclear / several staff members seem to work on similar issues.” (Comments in the Staff Survey)

90. In addition, the RNB staff perceived shortcomings in the way the RBE shared information, stating it was not always clear and comprehensive. RNB staff stated they would like to receive more updates from the activities of the RBE and its exchanges with key interlocutors in the region such as EU institutions and agencies. More information should also be shared between locations, i.e., staff working in Stockholm, Geneva, Brussels, rather than having isolated teams defined by geography working on similar issues - for example, communications staff work across locations and offices on similar resources and documents. Staff expressed the desire to share more experiences with other country offices and MCOs in Europe. Another task was the responsibility of the RBE in terms of translation of normative guidance. Despite the increase in technical staff in the Bureau, there were possibilities to strengthen that guidance. For example, the recent evaluation on statelessness called for increased high level advocacy support from the Bureau and the HQ to facilitate the way forward for country operations on statelessness.⁷³

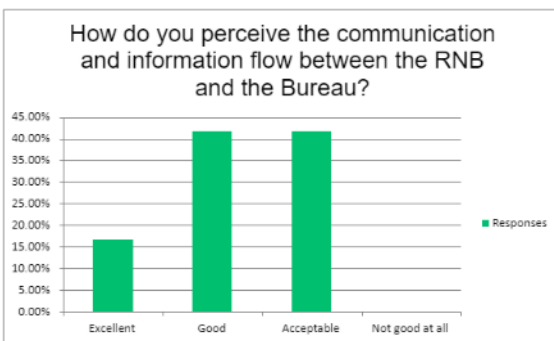


Figure 10: Survey responses from UNHCR staff

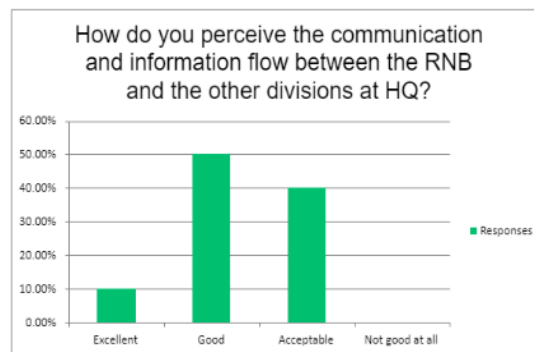


Figure 11: Survey responses from UNHCR staff

As noted above, the emergency situation on the Belarus border resulted in increased attention in the sub-region, including from the High Commissioner, leading to intensified cooperation and support. When developments in Lithuania became more acute, the RNB’s role as an interlocutor and key actor in the response to the crisis increased. Information from the affected countries to the RBE was channelled through the RNB. At the same time though, the Bureau communicated directly with EU institutions without the direct involvement of RNB. The evaluation did not pick up on major differences of opinion on how to approach the emergency. Field missions on protection and shelter were supported by the RBE building on contacts previously maintained by RNB colleagues. Furthermore, an expert on community-based protection was brought in to back-stop the RNB and RBE, which was deemed particularly important due to the limited experience colleagues in Lithuania had with

⁷³ UNHCR (2021). Evaluation of UNHCR-lead Initiatives to End Statelessness. ES/2021/03, May 2021.

emergencies and because the demands overwhelmed UNHCR’s capacities. However, the RBE did not deploy a dedicated officer for the crisis, which would have been welcomed by some RNB staff. A missed opportunity, identified by external interlocutors, was the need to strengthen cooperation with the UNHCR office in Belarus. In addition, they would have liked to see joint messages from UNHCR offices on both sides of the border.

4.4 Appropriateness of the RBM approach

The new RBM approach is potentially valuable and useful to manage and demonstrate results, but there are some constraining factors influencing the full leveraging of the system for country-based planning and analysis and evidence-based decision-making. These factors include a need for improved understanding of outcomes and impact oriented results chain, limited experience of staff on how to leverage COMPASS in a flexible manner and the fact the overall RBM approach is mainly directed towards larger UNHCR operations that deliver multi-sectoral services.

91. The RBM approach is welcomed as a valuable tool to manage and demonstrate results and to inform future strategic planning. Staff welcomed the replacement of Focus with COMPASS, in particular the enhanced flexibility of the system to adapt results areas and indicators to the requirements of the office. Another positive change reported to the evaluation team was that the RBM encourages staff to reflect on the context and the desired impact of their activities in connection with the multi-year planning approach. Also, the linkage between the measurement of results and the broader global framework, including with SDGs, was explicitly mentioned as a positive change.

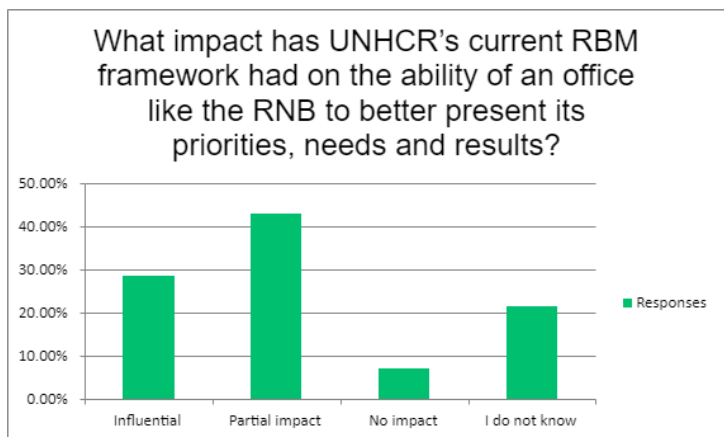


Figure 12: Survey responses from UNHCR staff

92. Furthermore, the new RBM approach/COMPASS with its new system has been launched only in the first quarter of 2021 and the consolidation of a results-based culture remains a work in progress. The focus of this first year has been on laying the foundations with many learning activities and the explanation of RBM concepts. In fact, the pandemic may have had a positive impact on this roll-out since the provision of online training was less time and resource intensive and Headquarters could reach more staff accordingly. Only as of 2022, the actual implementation of the strategies with support of the RBE started. However, the evaluation identified that not all staff were familiar yet with the simplified results framework (impact, outcomes and, outputs) and with its potential advantages for cooperation with external actors, despite the availability of training and guidance material.

93. Yet, staff reiterated that the consolidation of UNHCR’s RBM system also depended on the ability of partners (including non-UN) to integrate into this new way of working and adapt to the use of this accountability regime. Indeed, one of the reasons leading to the transformation of the way results and impact are measured and used, was the desire to enable a greater focus on collective outcomes and impact in light of the GCR and the Grand Bargain. Staff had doubts concerning the

capacities of partners for following this approach. This finding is also linked to the remaining potential to include partners more into multi-year planning exercises and the transformation of partnership agreements, as explained in other parts of this report.

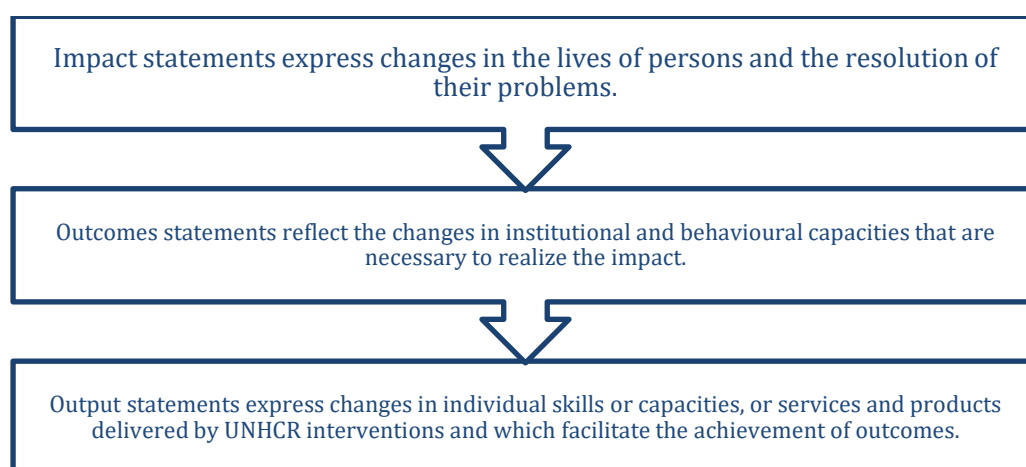


Figure 13: UNHCR Results Chain (Source: UNHCR (n.d.) Tip sheet: reviewing results statement and results chains.

94. There continues to be doubts as to whether the indicators of the RBM system are appropriate for UNHCR offices with less direct operational activities and a heavy focus on protection advocacy. In general, there remains a degree of hesitation on how to self-define and formulate results and indicators to the needs of the office. In particular, staff are unclear how such advocacy activities can be measured and how causal linkages and attribution can be determined between UNHCR programmes and changes in the national legislations in the countries under RNB’s responsibility given the range of other actors and factors involved. Staff question the definition of impact measurement for advocacy, especially if indicators need to be provided in the short-to medium term, or in the acknowledgment that UNHCR is only one stakeholder among many. Another challenge noted is the contrast between indicators at country-level whereas the strategy is defined at the sub-regional level. Even though the option exists to develop a light country plan to complement the multi-country results framework⁷⁴, the choice made for the MYMP strategy continues to heavily influence the RBM framework.
95. Headquarters recognized these challenges⁷⁵ and confirmed the need to draw lessons learned after the roll-out, including about the requirements of the COMPASS/RBM system for MCOs. Despite several meetings between the RNB and HQ, both sides acknowledged the need to further reflect on more appropriate indicators for legal advocacy and protection. In addition, there continues to be some confusion around concepts and terminology. Additional training and understanding would therefore be beneficial, including on: 1) the importance for each office to include standard core impact indicators for UNHCR to monitor and showcase the positive changes in the lives of POC; 2) the difference between outputs and activities: *Protection is what UNHCR does, programming is how this is done*⁷⁶; and 3) the requirements to contribute outcomes and impact rather than to attribute them directly to the inputs by UNHCR.

⁷⁴ UNHCR (2021). Multi-Country Offices. Planning for 2022 and beyond: overview of requirements and options. UNHCR/AI/2021/01 – Annex F.

⁷⁵ Also UNHCR’s Programme Manual (2020) recognized that operations sometimes find it difficult to identify an appropriate indicator in the results framework to measure progress towards objectives in a certain region of country.

⁷⁶ As defined by UNHCR (2020). Programme Manual. Chapter 4.

Chapter 5: Cooperation with stakeholders in the region

This chapter discusses the third evaluation question, namely to what extent has the RNB sufficiently leveraged potential partnerships with relevant stakeholders at all levels, including civil society organizations, to advocate for and support refugee protection and solutions in line with the identified priorities. As such, this section assesses the criterion of internal coherence and provides details on related topics, including partnerships, the GCR, resource mobilization and advocacy.

5.1 Partnerships

There are untapped opportunities to further identify, develop and strengthen partnerships. Cooperation with partners have been constrained by limited human resources and a focus on more traditional issues in the region and sub-region. There are recent good practices to explore new types of partnerships, including with refugee-led organizations, municipal authorities, and other entities working on integration activities.

96. During the period 2017-2020, there were at least seven programmatic partnerships receiving financial support from UNHCR established with state and non-state entities in Sweden (*Stiftelsen Svensk Industridesign*, Sweden Red Cross, Swedish Refugee Advice Centre), Lithuania (Lithuanian Red Cross, Artscape), Estonia (Estonian Human Rights Center) and Latvia (Latvian Center for Human Rights). Furthermore, UNHCR has ongoing partnerships with a number of other organizations, including with the Norwegian Organization for Asylum Seekers (NOAS), Danish Refugee Council, Finish Refugee Council, Caritas, different National Red Cross and Red Crescent societies in both Nordic and Baltic countries. In addition to the global partnership with the IKEA foundation (Sweden), there are examples of projects implemented with partners or established networks in the sub-region, for instance, the legal clinics in [Norway](#) and the Colab 2.0 in [Sweden](#).
97. The new RBM approach with the MYMP pilot triggered renewed focus on partnerships in light of long-term strategic planning, but the RNB was unable to fully explore this increased focus due to limited resources. As a result of demands placed on it, the RNB was understaffed in the areas of external relations, communications, and other coordination. This was especially clear for partnerships with a strong potential for enhanced visibility of refugee and asylum issues, e.g., when partners could assist in disseminating joint messages on those issues. A second consequence relates to ad hoc planning with partners, as confirmed by the majority of key informants. An unbalanced situation was observed, with differences noted across the countries and with different types of partnerships. For example, legal networks were established with partners in countries such as [Lithuania](#) and [Norway](#). This resulted in an overinvestment on legal protection issues and actors during the period evaluated, which may have been justified in the past with UNHCR's primary focus on legislative reform and strategic litigation. On the other hand, the potential for cooperation with entities supporting integration, for instance the Red Cross and local churches in [Norway](#), could have been better explored by the RNB.
98. In particular, there are recent good practices in exploring partnerships related to integration. Indeed, civil society and NGOs may be well placed to be more engaged by UNHCR in integration initiatives. There is also space for UNHCR to assume a more active advocacy role on related aspects, to ensure cross-fertilization between Nordic and Baltic countries, as well as to continue

providing normative guidance on standards and indicators relating to a satisfactory level of integration. In [Norway](#), where integration is effectively managed by public and private sector (potential) partners, UNHCR tends to be less visible. There are indications that community-based integration support by UNHCR in [Lithuania](#) and [Sweden](#) is on the right track. For example, the support from UNHCR in Lithuania to municipalities and to new civil society organizations like Artscape, have been positively received and is said to generate positive results. In this case, UNHCR may not have direct contact with the POC, but directly supports organizations which have individual contacts.

99. Furthermore, partners have certain expectations of UNHCR, which do not necessarily reflect those of UNHCR. This includes differences in terms of content and in terms of format. In terms of content, partners look to UNHCR for support in mentoring and advice. The evaluation confirmed that partners perceive UNHCR as being a source of information and provision of references and standards on protection and durable solutions. Some partners openly acknowledged that the financial support provided by UNHCR was helpful in complementing other funding streams, though this was not the most important support they would have expected from UNHCR. However, not all partners were aware of the different kinds of support that UNHCR was able to offer which indicates the need for more clarity from UNHCR's side coupled with more sustained engagement and conversations regarding partnerships.
100. More specifically, governmental partners in [Norway](#) and [Sweden](#) do not see the need for technical support from the RNB (except for exchanges provided to/with asylum agencies). Yet they do appreciate guidance provided by the office in Brussels (e.g., on European policies) and the HQ in Geneva (on global issues). However, direct technical support to countries in the sub-region, e.g., Iceland and Lithuania, has been provided and considered useful in terms of sharing best practices, legal advice and procedures. In countries where UNHCR has no presence, there are different perspectives likely linked to expectations, e.g., in [Norway](#), where most civil society/non-profit private organizations have the perception that advocacy support has been useful but not frequent enough, whereas, in Finland, the support provided was considered sufficient. Overall, partners tend to question the relevance of UNHCR's support when compared to that already provided by other specialized organizations in the sub-region, namely in terms of legal support. One significant exception is the much-needed UNHCR cooperation with and support to organizations working on statelessness.
101. In terms of format, programmatic partners did not always understand the need for cumbersome bureaucratic procedures to formalize and manage the partnership and provide support or guidance. In this regard, they would appreciate simpler procedures for formalizing partnerships with NGOs (when compared to other UN agencies). Internal reputational risk assessments and processes for funding support are seen as unnecessarily delaying the "real work". In addition, partnerships were considered to be rather 'person dependent'. Yet, the informal nature of many consultations between UNHCR and partners is regarded as valuable, having occasionally led to impactful joint action. For instance, in [Norway](#), the physical presence of a country focal point enabled the regular monitoring of established partnerships and the provision of valuable legal advice and support to partners.
102. UNHCR's direct interaction with refugees and refugee organizations is limited. In the case of stateless populations, it is non-existent. There is therefore the potential for performing a platform role in the Nordic and Baltic countries. In 2019 the RNB commissioned a mapping of existing

refugee/voluntary organizations working on community outreach/ engagement with refugees in Sweden.⁷⁷ One key finding relates to current limited capacity of refugee-led voluntary organizations to support and advocate for refugees' rights (when compared to non-refugee-led ones). In the sub-region, UNHCR has not been able to build relations with refugee-led organizations despite having identified the need, except for the more recent focus on this sector in the Baltic countries. This not only hinders UNHCR's visibility, but limits, to some extent, its ability to understand the needs of POC, and any opportunities for their integration, in particular where there are insufficient exchanges with national civil society partners. It has also implications in the visibility given by UNHCR to success stories of POC, including refugees. The RNB could work with partners to identify and give visibility to POC that have successfully integrated into their respective asylum countries, which could also then be injected into the public debates around migration.

103. Responses from UNHCR staff to the online survey regarding partnerships in general (private sector, civil society, government) indicate that: i) the RNB has *partially leveraged* key partnerships with relevant stakeholders to protect POC and further their access to solutions (Figure 15); and ii) RNB is *somewhat effective* in working with key partners (Figure 14).

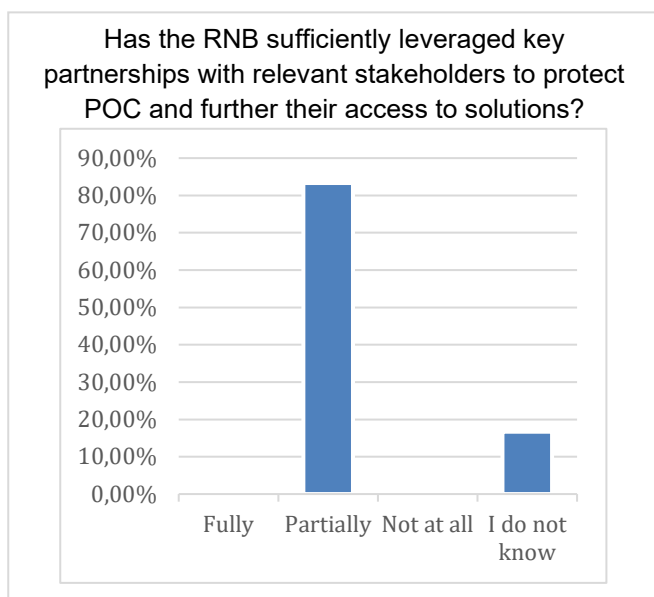


Figure 15: Survey responses from UNHCR staff

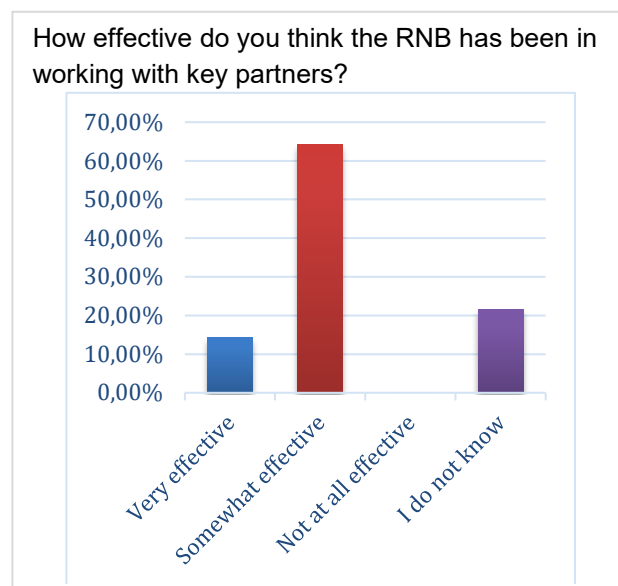


Figure 14: Survey responses from UNHCR staff

104. These survey findings indicated that the new multi-partner approach enabled and facilitated strategic engagement with partners, but there is a perception that the process is still at an early stage and that more investment in partnerships needs to happen. Furthermore, the situation differs significantly between major donor countries, where the RNB engaged with a wider range of actors, and other countries in the sub-region where that engagement is more limited.

“We could do more to be more approachable, work more in tandem and complementarity than from the UN international bubble.” (Survey respondent)

⁷⁷ UNHCR (2019), “Mapping of refugee/voluntary organizations in Sweden”, Mapping Report: Sweden.

105. From an external perspective, responses from civil society partners, NGOs and other UN agencies point to the limited impact of partnerships, considering that: i) the partnership with UNHCR resulted in a *partial* impact for POC (Figure 16) and; ii) the RNB was able to *partially* maintain the partnership in an effective manner (Figure 17). There is an overall perception that RNB lacks ambition in this regard and that it has not always been responsive enough to the contact of different partners and to issues raised. In other cases, there is no direct collaboration, but there is some impact since UNHCR, and other organizations are working towards the same goal. Certain organizations consider the partnership with UNHCR as providing more visibility and added a stronger voice to the work carried out in their respective country. The role UNHCR played in the development of a community sponsorship system and support to increased NGO efforts on statelessness in [Sweden](#) was also appreciated. Nevertheless, in terms of statelessness, the Organization has not explored the potential role that NGOs could play as implementing partners. Furthermore, current partnerships on statelessness elsewhere in the sub-region were considered to be “very sporadic and fragile” (survey respondent).

If relevant, do you perceive your partnership with UNHCR having a significant impact for persons of concern?

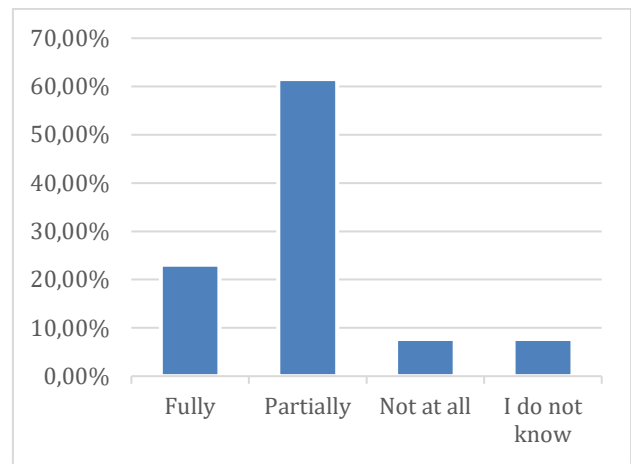


Figure 16: Survey responses from partners (excluding government and academia)

Do you feel that the UNHCR Representation for the Nordic and Baltic countries has effectively maintained the partnership it has with you?

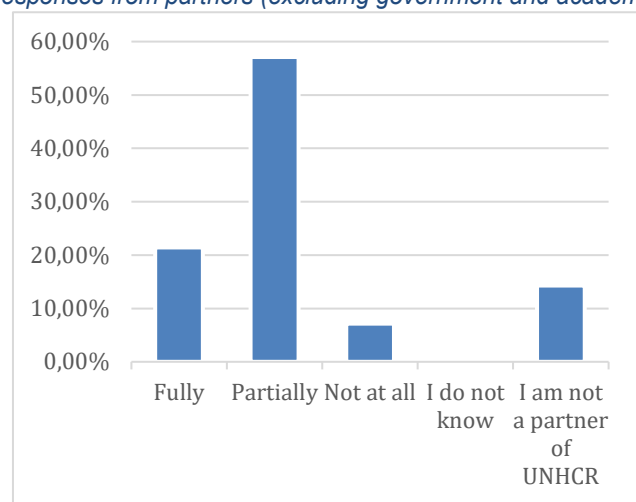


Figure 17: Survey responses from partners (excluding government and academia)

Is there any support you would need, but which you have not received so far?

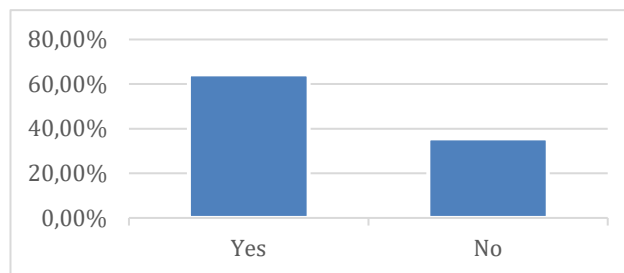


Figure 18: Survey responses from partners (excluding government and academia)

106. Furthermore, the majority of partners consider that they did not receive the full support they may have needed from UNHCR (Figure 18). This includes, inter alia, information sharing and provision of an overview on migrants in the Nordic countries, more frequent advocacy support, and provision of funding for publications on relevant topics.

4.2 Advocacy

The RNB was not able to fully meet its objectives in terms of advocacy and visibility of refugee and stateless related issues in the Nordic and Baltic countries. There is a need to address and balance expectations from CSOs and other private stakeholders in light of their expressed need for more robust engagement by UNHCR in the public arena.

107. Advocacy led by RNB is considered *somewhat effective* although not sufficiently visible. There is the expectation that the MYMP process will offer the opportunity for UNHCR to be more strategic at advocating. However, the way in which UNHCR assesses the shape and extent of its advocacy on an issue, including the assessment of benefits and risks of any proposed action, is not well understood by non-governmental partners. Overall, partners consider advocacy efforts to be more effective when led by UNHCR, or jointly by UNHCR and other UN agencies, such as UNICEF. Whereas competing calls from different stakeholders tend to focus on critical issues, UNHCR's advocacy efforts would benefit from better communication on positive stories as well.

108. In addition, there is the overall expectation from non-public interlocutors for UNHCR to present a more vocally assertive stand in light of issues related to the deterioration of the asylum and protection space in the sub-region. Furthermore, and partly due to lack of capacity, it has not fully leveraged the opportunities for addressing statelessness issues in the sub-region. There is an overall perception that UNHCR's role is rather normative. In that sense, there is the need to focus on domestic law and legislative frameworks with a heavy focus on litigation, for more effective advocacy – including public advocacy on statelessness. In some countries, such as [Sweden](#), which is also embarking on an election in which migration features heavily on the domestic agenda, there is the expectation and the need for UNHCR to better target the average Swedish citizen, speak to the Swedish public and improve the brand and visibility of UNHCR in the country. UNHCR also has a more active advocacy role to play in [Norway](#) with the potential to enable a

much-needed overview of integration that would benefit Norway as well through the sharing of best practices and cross-fertilization.

109. Furthermore, stakeholders have unmet expectations in terms of the visibility of their support to UNHCR. Donor governments increasingly request visibility at the local level vis-à-vis their public to highlight their funding to UNHCR. This requires both reinforced public information teams with more strategic public information campaigns, in cooperation with key partners in the sub-region using tailor made and localized messaging. Such visibility campaigns are expected to actively engage with parliamentarians, diaspora groups and civil society in general. In the long term, this approach would be expected to contribute to resource mobilization as well.

110. Finally, UNHCR’s priorities in the Nordic and Baltic countries need to be communicated and disseminated clearly to key interlocutors. This evaluation demonstrated that all too often stakeholders in the sub-region were not fully aware of the priorities and activities of UNHCR, as well as the constraints that it was working under with regard to its capacities for covering eight countries.

111. The graphics below present perceptions expressed by external KIIs of UNHCR’s advocacy role, which is considered to be *partially effective* for the majority of respondents. There is the overall perception of a lack of visibility, as well as of longer-term planning of UNHCR’s advocacy efforts, including through more solid partnerships in the sub-region. The noted exception is UNHCR’s current work in the Baltics, namely Lithuania, where it has gained greater visibility, e.g., through a more frequent media presence. Furthermore, certain partners question the de-prioritization of country specific advocacy goals to the detriment of more global issues, as one survey respondent stated the following: “*Sometimes it seems that global themes/strategic points are forced on to every country in the region even if other themes would be more topical in that country at a certain point.*” Moreover, joint advocacy with NGOs and individual experts on statelessness, and direct contact with stateless communities, has not been explored either in the sub-region, nor the wider region.

In your view, how effective are UNHCR advocacy efforts in the country, sub-region and/or region?

Figure 19: Survey responses from academia

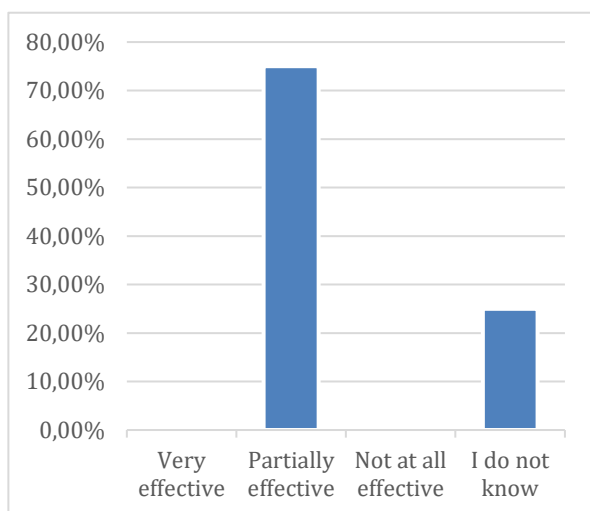
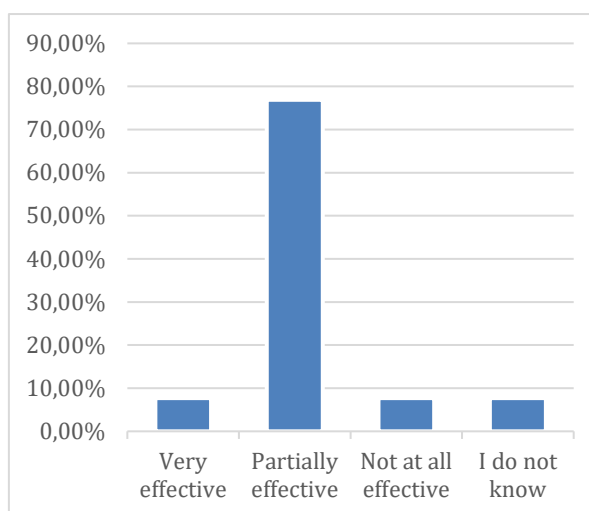


Figure 20: Survey responses from partners (excluding government and academia)



4.3 Leveraging the GCR

The GCR process in the Nordic and Baltic countries is led by UNHCR HQ with limited involvement of the RNB. Whereas the GCR is embedded in UNHCR’s work worldwide, it is currently underemphasized in the sub-region. Nevertheless, the GCR approach has the potential to further leverage UNHCR’s role by explicitly tying global solutions to domestic issues in the sub-region.

112. First, there are overall signs of inconsistency between stricter domestic policies on the one hand and human rights promotion abroad by some governments in the sub-region on the other (e.g., solidarity function and right to asylum). This reflects a source of tension that interlocutors believe is not being fully addressed by UNHCR. Funding-wise, UNHCR is exploring developing stronger partnerships with development funding actors in the sub-region, in both [Sweden](#) (Sida) and [Norway](#) (NORAD) as part of its broader strategic donor engagement. This entails some challenges, namely in terms of complying with donor requirements for e.g., reporting, and visibility to the donor. Countries in the sub-region excel in their contributions to objectives of the GCR and in supporting it politically. Norway, Sweden, Denmark, and Iceland are among the top 10 donor countries (based on gross national income).⁷⁸ On resettlement, both [Sweden](#) and [Norway](#) are some of the most important partners, while Finland increased resettlement quotas and focuses on disability and underrepresented groups. Countries in the Baltics are not traditional donors but have fulfilled pledges. Figure 21 provides an overview of resettlement per country in the sub-region from 2017 to 2020.

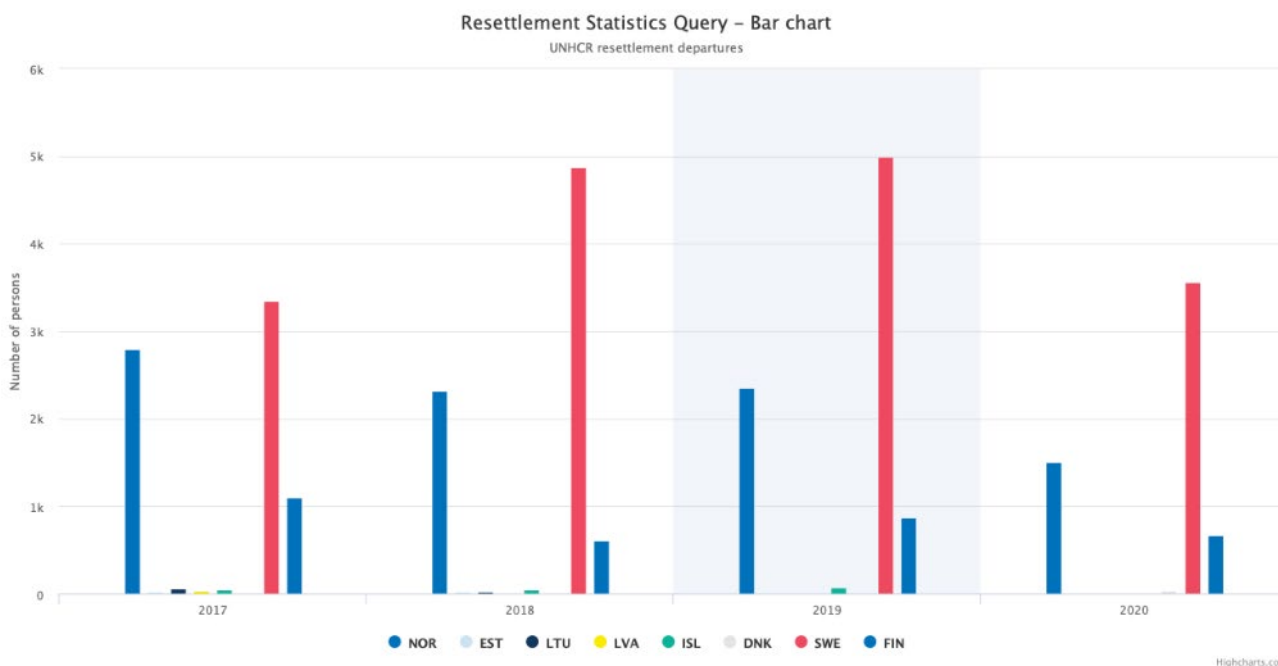


Figure 21: Resettlement statistics in Northern Europe

⁷⁸ UNHCR (2021), Global Compact of Refugees Indicator Report.

113. The RNB's contribution to the implementation of a whole-of-society (WoS) approach espoused by the GCR lacks evidence in the Nordic and Baltic countries. There is a "more of society" approach with GCR generally informing UNHCR's external engagement in the sub-region through Private Sector Partnerships (PSP) with a global focus. However, the engagement of UNHCR's PSP service and its contribution to a WoS approach has not been fully explored by the RNB. It would likely imply a rebalancing of existing priorities within the RNB in order to build PSP relationships that would directly benefit POC in the sub-region. Indeed, the GCR orientation in the region is very outward-looking and the GCR does not significantly impact UNHCR's work within the Nordic and Baltic countries. There is the internal perspective that GCR/GRF-related approaches are fully de-politicized and that UNHCR could have an important role to play in convincing governments that the GCR goes beyond providing funding for POC outside the region but includes domestic policies and resettlement commitments.
114. Furthermore, the GCR and GRF processes are mainly HQ-driven, thus engaging government actors through the HQ in Geneva. This requires clarification with some governmental partners on the division of roles and responsibilities between Geneva and Stockholm-based counterparts.
115. Finally, COVID-19 related restrictions hampered, to some extent, efforts to follow-up on the application of the GCR. While there were delays in the implementation of certain visibility and outreach activities, there are also examples of GCR-related initiatives in the sub-region in recent years, e.g., events organized within the Intercultural Cities Initiative, co-led with the Council of Europe (CoE), focusing on integration in different Nordic countries.⁷⁹

4.4 Resource mobilization

While contradictory views have been expressed, the experience of the RNB confirms that UNHCR has not provided a clear answer to the perceived delicate balance between its resource mobilization role and its protection mandate or priorities. This is particularly reflected in the RNB, where the Organization is coping with ongoing tension rather than actively managing it.

116. The RNB's engagement with most Nordic countries exemplifies the (challenging) balance between implementing different key priorities and objectives, namely resource mobilization and carrying out its protection-related role. This is generally managed by allocating different contact persons or departments/divisions to different interlocutors, e.g., Ministry of Justice for legal and protection issues, and Ministry of Foreign Affairs for resource mobilization.
117. In this context, despite its significant role in supporting DRRM, the RNB has a limited role in fundraising and resource mobilization, which hampers the visibility it receives vis-à-vis certain interlocutors. The RNB provides analysis of political developments, background information and talking points in its support to RBE and HQ. The HQ's role in fundraising⁸⁰ is understood by most external interlocutors, but not how the RNB supports that engagement. This is, however, clear for most internal interlocutors, with some stating there is no need for the RNB to assume complementary fundraising functions. In [Sweden](#), the RNB's fundraising, and resource

⁷⁹ Based on review of internal documents, including background information and agenda of seminars organized in e.g. Finland and Iceland by UNHCR and the CoE, under the Initiative on the Intercultural Cities Programme (ICC), with the participation of different national stakeholders.

⁸⁰ Regarding statelessness, since offices do not programme for statelessness, it is not possible for the Division of External Relations (DER) to raise funds as a global issue.

mobilization role is particularly limited due to the fact that the Organization has a dedicated partner, Sweden for UNHCR, to perform that function.

118. UNHCR’s role and mandate have been useful for certain governments in the Nordic countries, as it often supports their policies on refugee and asylum issues, by promoting UNHCR as “the global voice”. Nevertheless, for these governments and the public in general, there is a lack of clarity in terms of how governments interact with UNHCR’s role as a resource mobilization actor within the UN family.
119. Finally, there is evidence of clear messages being delivered by UNHCR to important donors with stricter asylum and/or integration policies. For instance, in [Norway](#), during 2018-2019, UNHCR was considered to have taken a direct position towards the government, in particular regarding the reunification act. The majority of UNHCR staff responding to the evaluation survey recognized the tension between the resource mobilization role and the protection role at times. They also recognized the role of harnessing support for UNHCR’s operations globally vis-à-vis its supervisory role of the 1951 Convention at the national level, with its other key priorities and objectives, particularly protection-related ones. This is demonstrated in the survey results illustrated in Figure 22.

“The main tension is between advocacy for global solidarity (...) and advocacy for access to protection in the Nordic countries. UNHCR is not resolving these tensions but coping with it and navigating between the two seemingly incompatible advocacy messages.”
(Survey comment)

Do you see any tensions between UNHCR’s commitment/plans in some areas (for example, protection advocacy and fundraising)?

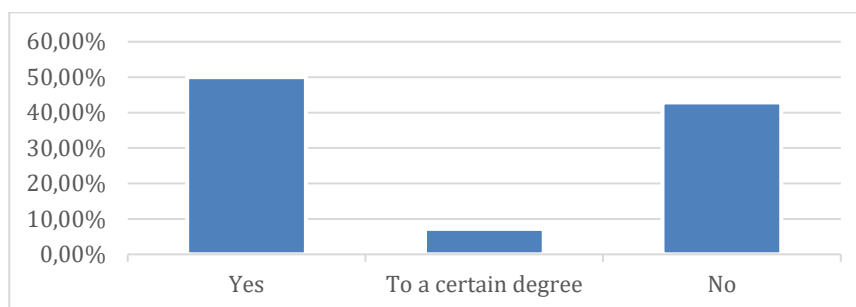


Figure 22: Survey response from UNHCR staff

120. The allocation of fundraising and donor mobilization functions to separate entities, such as Sweden for UNHCR and PSP in general, helped in setting up a clearer line between fundraising for global solidarity and advocacy on domestic issues. Nevertheless, there is still a lack of clarity in terms of division of roles and responsibilities (resulting in difficulties in the Swedish public in distinguishing Sweden for UNHCR from the RNB, especially given higher levels of visibility of the former), as well as of effective coordination with those entities.

Chapter 6: Lessons learn from Multi-Country Operations in high-income country contexts

This chapter discusses the final evaluation question, namely what lessons can be learned from the RNB regarding the implementation of its global and local priorities in high-income country contexts where UNHCR provides less/no direct support to Persons of Concern. The chapter is organized in line with the three previous chapters and summarizes these findings and observations which are of interest and relevance for other multi-country operations and other parts of UNHCR.

6.1 First results from the implementation of MYMP in high-income country contexts

121. The evaluation has identified a number of lessons learned for UNHCR in how best to approach prioritization and planning in high-income country contexts.
122. Of course, it is premature to be able to fully assess the impact of the MYMP on RNB's own ability to plan. On the one hand, the MYMP has allowed offices to focus on a strategic multi-year vision. On the other hand, the MYMP could have better factored in an analysis and contingency plans to address risks and deal with future emergencies, such as the situation at the Lithuanian-Belarusian border. Furthermore, country-based plans had to be inserted outside of the system, which weakened the synergy between regional and country level activities. Moreover, now that UNHCR offices do not have to clearly delineate the parts that concern different groups of persons of concern, it was challenging to clearly see the planned activities, standards and outputs concerning stateless persons. This may also have contributed to further "diluting" their needs and actions targeting them.
123. Commitment at the most senior level was and continues to be crucial for an effective planning process using the MYMP. RNB represents a positive example of where the expertise and commitment of senior management to the process facilitated its ability to plan and to transition from the former planning process to the current one.
124. It is important to continue to engage partners and POC to UNHCR in the detailed MYMP in order to arrive at a relevant, up-to-date needs assessment and to inform the contextual and operational assessments. While RNB may have involved some government counterparts and NGOs in the beginning, the involvement was not regular throughout the process. Furthermore, POC were not engaged at all for the purpose of the MYMP which therefore denied them the opportunity to articulate their needs. At the same time, and as one KI mentioned, the engagement of POC in planning processes will lead to the further refinement of the needs assessments and possibly their expansion, increasing the pressure to prioritize and the challenge of doing so effectively.
125. The phased approach to rolling out the MYMP has been beneficial for operations allowing for adjustments and for offices to get used to the significant change in programming. Country operations that were included in the pilot phase of the MYMP roll-out such as RNB particularly benefited from a phased settling in period to the new planning process and to learn lessons early on. This learning and adjustment process was positively supported by the relevant divisions in Headquarters and the Bureau.

126. Important adjustments are still needed in the MYMP to better take into consideration the needs of UNHCR operations that do not have extensive multi-sectoral programmes and activities and that are more focused on advocacy. Opportunities for exchange of information, practices and approaches between MCOs that have similar structures could have been stronger. This is an approach that UNHCR HQ may wish to consider for future MYMP processes (to facilitate regular exchanges between MCOs that have similar functions and structures), e.g., the RNB and the MCO in Washington.

6.2 First results from decentralization of UNHCR in high-income country contexts

127. The findings of this evaluation have identified a number of lessons learned in terms of the required structure and capacities of UNHCR in high-income country contexts. Indeed, the European context results in a set of different requirements for structure and resources compared to other, more operationally focused settings.

128. It is a reality that financial resources for UNHCR in high-income countries are limited in light of the rather developed protection environment in these countries, the capacities of national actors, civil society and other supporting systems, and the larger needs to provide protection to POC in other parts of the world. This pre-defined limitation forces UNHCR offices in Europe, and more particularly the RNB, to make choices in terms of priorities, capacities and structures. Rather than expecting a large increase in funds, except for in emergency situations, the question is more about how resources are divided and allocated across eight countries of operations, across a wide set of priorities and different protection needs. The RNB has tested a number of approaches in the past year, but in light of the newly introduced MYMP, further room is available to strategically divide these resources.

129. Moreover, human resources are impacted by the availability of financial resources, but also by the widespread responsibilities of the RNB. It is a constant juggling act to dedicate sufficient resources to eight countries with different languages, cultures and protection needs, including the existence of two different regional clusters: the Nordic and the Baltic countries. The experience of the RNB indicates that this balancing act is an inherent challenge. Although various options in terms of dividing human resources along thematic and country responsibilities have been tested, it is uncertain if a perfect solution can be found. A few basics seem crucial though to be considered: the importance of language, the advantage of having national staff, the need for cross-fertilization among staff and the added value of personal networks and informal relations.

130. Decentralization has not clarified the position of multi-country offices and a strategic approach towards country presences underneath multi-country offices has not been identified for the Nordics and Baltics. Yet, the RNB experience indicates that overall, the set-up in Nordic and Baltics with a combination of multi-country offices and country presence works, despite a number of ongoing difficulties. The RNB plays an important intermediate role between country presences and the RBE and can channel a large amount of administrative and reporting requirements. Country presences make sense for continuous network-building and data gathering on the country, but its main advantages have been demonstrated during emergency situations. Country presences act as contingency measures for developing situations. Lessons learned are that flexibility in terms of structure, in addition to solid risk analysis, are key to decide on country presences. During emergencies, the support of the Bureau and Headquarters are important to take on additional responsibilities for national staff to continue their long-term work.

131. Finally, the impact of UNHCR in high-income countries is more difficult to measure than in other countries. This does not mean though that it cannot be done. Only, it requires a slightly adapted approach with appropriate indicators, and the right expectations of the degree of results that can be demonstrated. Contribution instead of attribution is key. The RBM approach with its long-term vision is even more important in such contexts where more strategic reflections are needed.

6.3 First results from the partnership approach of UNHCR in high-income country contexts

132. The evaluation clearly demonstrates that the specific European context demands further adaptation of the partnership approach to the evolving political environment. These adjustments are to be tackled in a strategic manner, including actively managing the perceived tension between its resource mobilization and protection-related objectives, and jointly engaging with partners on PI and solutions.

133. Indeed, the role of UNHCR in Europe in general needs to be understood in light of the EU's policy and existing migration and asylum structures, including the two main EU agencies, EASO and Frontex. This requires different and possibly innovative partnership approaches in line with pre-set priorities. In this sense, the EU would have a response role and UNHCR could take on a support one, e.g., on reception settings. However, lessons learned from the RNB experience demonstrate that this support role requires further investments in diversified staff skills, not only dependable on surge capacity. With advocacy and external engagement being the backbone of UNHCR's role in Europe in general, the Organization needs to further invest in complementing – and promoting – activities carried out by other actors in the region and sub-region. In fact, there are untapped opportunities for UNHCR to partner with less traditional partners, including grass-roots organizations, including refugee-led ones, and municipalities.

134. Furthermore, the evaluation refers to the potential negative impact of unclear and/or lack of communication on priorities and its overall mandate in high-income country contexts. Political engagement remains challenging with/in important donor countries. It is recommended to speak to and share information on the impact of governmental donors' funding with the constituencies of those countries to maintain overall support for these high levels of funds. Given the different perceptions of UNHCR in Europe, when compared with field operations for example, dissemination of information to the public needs to be adapted, including on how to present unearmarked contributions from governments to the public, not exclusively via social media.

135. As the asylum and protection space in Europe becomes more restricted, there is the need for UNHCR to actively manage the delicate balance between its donor mobilization and protection role. In this sense, there is room for RNB to refer to the GCR in a systematic matter, possibly with guidance from HQ and/or RBE on how to tailor it to the European context. Furthermore, there is the general perception that UNHCR should be more visible in the public, as well as the private arena, including within academic debates on contemporary issues.

136. Finally, UNHCR has a limited participation in integration, as well as in the interaction with POC in the sub-region. Yet, UNHCR has the potential to play a catalytic role bringing actors together, including refugee-led organizations, and providing smaller inputs but still with the potential for impact.

Chapter 7 Conclusions and Recommendations

7.1 Conclusions

137. Initially, when this evaluation was commissioned the focus of this exercise was the delivery of the Office's MYMP between the years 2017-2020. However, during the course of the conduct of the evaluation, significant contextual changes occurred within the region. Two key factors namely, the emergence of COVID-19 and the emergency-like conditions on the border of Belarus as described in the report, affected the conduct of the evaluation. COVID-19 impacted the evaluation by limiting opportunities for in person travel to the region and directing significant attention of key interlocutors onto the effects of changed patterns of remote working and the atypical nature of remote interaction between UNHCR and its stakeholders. Similarly, respondents and key evaluation stakeholders' perspectives of UNHCR were shaped by the situation on the Belarus border, which while somewhat considered by the evaluation team, was not within the original evaluation objective.
138. These changes were, however, overshadowed by the large-scale displacement of Ukrainians and other nationalities resident in Ukraine (internal and cross border) instigated by Russian military activities in Ukraine in February 2022. Data gathering and analysis for this report was completed prior to the Ukrainian situation and could not take into account the plethora of policy changes in Europe nor the effects on UNHCR operations or, most importantly, on UNHCR persons of concern. Nevertheless, it is hoped that the conclusions and recommendations that follow will support and streamline UNHCR's work in the Nordic and Baltic countries by addressing gaps and structural challenges.

Value add of the RNB and prioritisation

139. Noting that historically there have been high protection standards in the region, the value of having country operations in the Nordics and Baltics (and other European countries with well-developed asylum and integration systems) has sometimes been questioned given the number of pressing protection and assistance priorities UNHCR faces in other regions of the world. However, the number of legal and contextual changes in the region, and the need to continue to advocate for upholding protection standards in conformity with the 1951 Convention demonstrates the importance of effective representation based on detailed contextual knowledge alongside maintaining strong relationships with civil society and State stakeholders.
140. The last six years have clearly demonstrated that the Nordics and Baltics is not a static protection environment. Operational and protection challenges caused by closures put in place to manage COVID-19, the emergency situations on the Belarus and Baltic country borders and now the spill-over effects of the conflict in Ukraine have brought about a significantly changed operating context. The recent developments, both in Ukraine and on the border with Belarus, indicate that flexibility will remain essential for UNCHR to be able to implement its mandate.
141. In attempting to realise its strategy the RNB is repeatedly confronted by resource constraints, impacting on the RNB's ability to balance competing priorities. Specifically, we note that whilst the operation has done its utmost to balance coverage across the Nordic and Baltic regions, and across different populations of concern in addition to providing technical support alongside its normative legal role, it has regularly been stretched beyond its capacity to meet both its own strategic goals and the expectations of its partners and stakeholders. Given the additional expectations that are likely to fall on the RNB as a result of the Ukraine crisis, the RNB is expected

to remain stretched and will continue to have to shuffle priorities as the broader context it follows evolves.

142. UNHCR has a pivotal role in providing comment on legislation as part of its mandate. However, one area the office may consider rebalancing is its investment in legal support and litigation – reserving its interventions to only those cases that have direct relevance for the interpretation of the Convention. While UNHCR should maintain its capacity to deliver comments on law and policy, the view of the evaluation team is that sponsoring litigation in individual case work is less effective and could be better carried out by well-placed national organisations and associations that have the corresponding knowledge and expertise. Approaching this work differently and collaboratively would allow UNHCR and its partners to leverage the collective intervention on litigation better and for staff time to focus on effective advocacy and strengthening relationships with national actors across a range of its thematic priorities such as complementary pathways and integration. More generally, an in-depth reflection process is needed as to what role UNHCR can effectively take on in environments such as the Nordics and Baltics, and to more clearly define and communicate its added value, including for UNHCR to promote the ‘voices of refugees’ and commit to fully support partners working on statelessness.

RNB Office Structure and design

143. It is vital that the operation retains its nimbleness and ability to swiftly pivot, and to continue to manage a range of different challenges and relationships in the region. The evaluation does not expect that the structural challenges that it faces can be overcome, but rather notes that the Office will continue to have to find and maintain a workable balance in terms of managing within finite financial resources, selecting staff with the right expertise and language skills, and building coherence between the office in Stockholm and country presences. Specifically, the use of focal points for specific countries who can then collaborate with staff with thematic and technical oversight is regarded as an effective means of organising staffing resources.

144. However, already a concern prior to the Ukraine crisis, the evaluation concluded that the RNB is unable to deal with additional requests without staff members becoming quickly exhausted and with the regular priorities hampered. As we describe below, while there are some actions that can help to reduce workloads, increase efficiency and thus free up staff time to focus on new emergencies or invest in programming areas and advocacy that can enhance the dignity and protection of POC, it will remain a balancing act between available capacities and their organization with the broad portfolio of the RNB. It therefore requires a possibility for the Office to receive temporary support from other European offices, the Regional Bureau, DIP or the emergency standby roster, in cases of exceptional workload, as was also resorted to in the case of the Belarus situation.

Effects of MYMP and the Change process

145. The evaluation team concludes that the change process initiated is a step in the right direction since the Organization is now oriented to formally record and strengthen its strategic thinking with a longer-term perspective and through a more coherent results-based management framework. While the effects of much of the change process had not yet had time to fully produce some of its fuller results for the time period covered under this evaluation (2017-2020), the evaluation team observed there is a need for clarification and streamlining of the way in which the RNB and potentially other MCO's interlock and interact with the Regional Bureau and the broader HQ services and divisions, and for a more tailored approach to the way in which corporate tools

consider the unique nature of these structures within UNHCR. RBM processes and now MYSP processes could be further adapted to reduce burdens placed on MCOs and operations that are predominantly focused on advocacy.

146. Specifically, on MYMP, the evaluation concludes that the roll out of MYMP was generally well managed and well supported but that this iteration of multi-year planning has not drastically changed either how the operation fundamentally plans nor how it delivers over the medium to longer term. Planning tools are only as good as the information that goes into them (including planning assumptions) and dedicated time is needed to discuss these planning assumptions and the anticipated operational and political environment for each country in detail.

Relationships with UNHCR entities: Europe Bureau & HQ divisions and Services

147. The evaluation notes that while on the whole the support provided to the RNB has been effective, for example on support developing and operationalising the MYMP, there has been friction and a lack of coherence between the RNB, UNHCR's HQ and the RBE, and missed opportunities to fully capitalise on the benefits of decentralisation.

- There is a recognition of the positive role played by the bureau in offering guidance on regionalisation and the intermediate function they played in guiding the RNB on change processes, including advocating for simplification. Given that the bureau covers over 30 operations within Europe, much of which are predominantly advocacy focused, this bridging role in ensuring that changes in budgeting and planning systems consider how smaller Office's with lighter operational footprints are factored in is valuable and should continue to be actively pursued. Equally, as MYSP and the broader change management process continues, there should be considerations for how to manage expectations of institutional reforms on smaller less traditional offices- potentially for example with flexibility for smaller operations not focused on direct delivery to be allowed a lower burden of reporting and planning.
- Throughout the evaluation the role of the RBE in emergencies or significantly changed contexts was discussed. The Ukraine situation has now dramatically shifted the focus and workload of the Europe Bureau. However, clarifying the nature of the support the bureau can offer during times of significant political change or large-scale emergencies as well as potentially finding surge support and capacity that can be drawn on would have helped the RNB manage the multiple shifts occurring simultaneously within its region. Moreover, in such situations, close discussions should take place with RBE and HQ to ensure additional support is made available.
- There is a greater potential role for the bureau in facilitating information sharing and building connections between staff in different operations in Europe - especially for staff affected by cross border dynamics that cut across different operations. This could come by linking staff at the working level in different operations together in either informal or formal communities of practice or exchanges. Additionally, cross regional analysis and information sharing might allow greater anticipation of related dynamics or better understanding of the implications of developments at the EU level that have knock-on consequences for the RNB. There is similarly appetite for greater connectedness between operations in specific sectors such as integration and advocacy.

148. One key opportunity to increase efficiency and coherence across institutional layers is to rationalise and better manage the nature of the asks from different HQ divisions and services. Much time is spent liaising with different parts of the HQ structure, often requesting similar sets of information - especially given that country information requests are effectively multiplied by eight for the RNB. This is only exacerbated during periods of high-profile political changes or emergencies. While the bureau has a key role in streamlining and managing these requests, more needs to be done to coordinate requests and asks across services and divisions.
149. The RNB's role in the mobilisation of financial resources remains a challenging area with a need for clarification of anticipated roles and responsibilities and reflecting on the time pressures that resourcing related requests have on the RNB. Given that the RNB is the established channel for communication with audiences in the Nordic and Baltic countries, expectations from donor states on information and communication products related to the impact of the resources generated with Nordic and Baltic region can fall disproportionately on the RNB, as can asks from DER on-background information. More-over, on one hand UNHCR relies on Governments in the region to provide financial resources to UNHCR (globally) managed predominantly by DER and on the other is mandated to hold States accountable (largely falling on the RNB) – resulting in a tension when UNHCR has to engage robustly e.g., when there are deficiencies in national systems in terms of the right to claim asylum and protection. While the division of labour between UNHCR in Stockholm and HQ (DER) is, in this regard, partly helpful in managing this tension, it does place the RNB (and vice versa) in a challenging position- especially if and when information is not adequately shared between DER and the RNB on developments and negotiations in their respective areas of work or when a State within the RNB anticipates that communications around financial resources supplied should be prioritised in public communications over and above more critical engagement on protection.

Relationships with external stakeholders

150. As discussed earlier in the conclusions section, relations with governmental entities in the sub-region continue to be affected by a) the complexity of managing relationships across 8 different legal jurisdictions and languages and b) the uncomfortable position of UNHCR vis a viz holding States in the region accountable while simultaneously relying on them for valuable financial resourcing. This is further complicated by the varied expectations that stakeholders from civil society, from governments, partners and persons of concern have of UNHCR, especially for the Organization to publicly advocate and be more vocal on issues that constitute a threat to international protection standards. Recognizing that this is a delicate balance and that UNHCR's representation has to strategically and tactically select the most viable channels for advocating for stronger protection standards, there is a need for greater transparency with external audiences on what the RNB's role is in the Nordics and Baltics, both with Member States and civil society partners; where possible explaining what it has prioritized and why.
151. The RNB has established valuable partnerships with a range of stakeholders, yet there is room for improvement in terms of identifying, selecting and maintaining these partnerships. Within the existing resource limitations there is a need to build on ongoing efforts to expand the focus of partnerships to working with civil society and grassroots organizations, for example on matters of complementary pathways and integration or at the municipality level. The evaluation also identified that there is a need for more regular engagement with partners, not only to inform activities and programmes, but also to hold more consultations and to generate input into UNHCR priorities with the potential for mutual learning. This would entail a more inclusive approach and enhance the multi-partner aspect of the MYMP. Still, more work has to be done to capitalize on

good practices, including in terms of integration work, and in taking on a mentor role for grassroots and refugee-led organizations which are better placed to work directly with persons of concern.

Relationships with POC

152. The evaluation team notes that, given the nature of the RNB's role there has been historically a limited direct engagement with persons of concern or representative bodies outside the RNB relationship with civil society organisations. While it is unlikely that the RNB will maintain the types of relationships and direct knowledge of the conditions of persons of concern that are present where UNHCR has a large operational footprint, the RNB would benefit from finding avenues to periodically and more directly exchange with persons of concern and have a first-hand understanding of their conditions and the challenges they face. This would add legitimacy to the RNB's analysis and help deepen the understanding of protection trends in the region.

7.2 Recommendations

153. The evaluation sets out a limited set of recommendations in view of the limitations of this exercise. Recommendations are set out at three levels, targeting the RNB, the Europe Bureau and Services and functions at HQ.

For the RNB

Recommendation 1: Communicate more transparently on the RNB's role in the region to States and partners with the aim to better manage expectations:

- a. The RNB should be clearer and more transparent with its interlocutors, including with government bodies, on what the office can/will do and what it cannot/will not do, including through an explanation that due to its regional role and range of responsibilities, it is unable to excessively focus on one country or role.
- b. Better manage expectations by emphasising its normative role, limitations and more importantly its added value and expertise.
- c. Better explain to key NGO and civil society interlocutors how it engages with its government counterparts on contentious issues

Recommendation 2: Strengthen the strategic and forward-looking approach of the RNB by reorienting its priorities towards greater investment in relationships with Government, civil society, NGO partners and other stakeholders:

- a. Reconsider the need for the current heavy engagement by UNHCR in strategic litigation and re-orient its focus on deepening its work with partners and enabling a more predictable and consistent engagement on other priorities such as enhancing expertise on integration, and statelessness issues.
- b. Provide opportunities for more systematic and regular engagement with key civil society partners in the region. This includes greater consultation with partners in developing and implementing its advocacy strategy.
- c. Provide more strategic leadership, forward analysis and guidance in key areas aimed at partners, especially national civil society organisations, alongside fora for detailed discussions and exchanges on protection issues.

Recommendation 3: Re-emphasize UNHCR's role to amplify refugee voices and perspectives and ensure that persons of concern are more visible in UNHCR's communication and advocacy strategies. This should be done by:

- a) Identifying areas of complementarities with partner organizations who are present in the different countries and who have more direct and closer contact with POC to refine assessments and understandings of the conditions of POC, the rights they enjoy and the challenges they are facing.
- b) Establishing or instigating the creation of refugee advisory boards or similar mechanisms in selected countries to be used by UNHCR as a sounding board or to understand key concerns of UNHCR's POC. This could be done by piloting models similar to the one initiated in UNHCR's Ireland Office in one country in the region and then expand it further if it is deemed helpful.
- c) Awareness-raising of the activities of partners and of the protection needs of POC in the sub-region, including through public campaigns, expansion and strengthening of partnership and coordination with other key actors that can amplify UNHCR's advocacy
- d) More explicitly leveraging the GCR within the Nordics and Baltics with governments and partners, demonstrating that resettlement, complementary pathways and strong domestic integration initiatives are linked to broader global commitments to protect and realise the dignity of POC

For the Europe Bureau

Recommendation 4: Enhance and strengthen the RBE's capacity to provide normative guidance, maintain coherence and manage information flows between HQ and the RNB. Moreover, the RBE should further clarify its role, available capacities and resources in emergency or emergency like situations for Europe at large. Specifically, the evaluation notes that the RBE could strengthen its role by

- a. Enhancing the bureau's role in providing tailored guidance on institutional reforms for country offices within its stable and by advocating for tailored reporting requirements for advocacy-based operations which are feasible and realistic
- b. Refine reporting and information expectations and reinforce the existing bureaus function of filtering and mediating between HQ divisions and the RNB to ensure coherence and predictability in requests emanating from HQ. Streamlined communication flows between HQ and the RNB, alongside transparent two-way information-sharing would reduce non-essential reporting and parallel information channels.
- c. Clarifying the type of support and capacities available to countries in situations of dramatic contextual changes
- d. Providing avenues and opportunities for greater learning by investing in cross regional trend analysis and foresight, linking regional political dynamics and changes in EU policy to likely effects for COs and MCOs within their region. Additionally, the bureau could initiate (or expand) information exchanges for technical staff through communities of practice or periodic meetings across operations within the RBE that are impacted by similar dynamics to share experiences and good practices.

For UNHCR HQ:

For the Division of Strategic Planning and Results with the Europe Bureau

Recommendation 5: Streamline tools, guidance and processes by “rightsizing” UNHCR’s RBM and reporting expectations with regards to the RNB and other similarly sized operations.

Further adapt the MYSP and RBM guidance to the needs of multi-country offices. Based on the lessons learned from the pilot phase, improvements should be made to overcome challenges experienced by the RNB, in particular on how to find a compromise between regional plans and country-based analysis and how to better tailor standards and indicators to the needs of a MCO which is focusing less on direct support and more on advocacy. These discussions could take place in coordination with other MCOs and with DSPR and the RBE. Moreover, these discussions need not represent significant reforms of UNHCR’s systems and tools but rather minor adjustments and derogations.

Recommendation 6:

For the Division of External Relations, the Europe Bureau donor focal points and the RNB

Jointly clarify the respective roles of the Division of External Relations (DER), the RBE and the RNB in resource mobilisation; and enhance internal communications on resource mobilisation by:

- a. Establishing clearer expectations for RNB staff linked to asks on donor relations and visibility. Additionally, UNHCR should more explicitly set out its preferred communication channels for donor Member States.
- b. While noting that UNHCR has to balance the way in which it utilises its external communication channels (e.g., social media and press) between more critical advocacy and to highlight the value of UNHCR’s donor contributions, there should be greater clarity on the management and sharing of donor related communication. This should include how relevant social media content and donor related content and messaging will be developed, managed and coordinated between DER and the RNB. Some progress in this regard is already underway, such as on joint visibility plans and joint visibility presentations at the annual bilateral meetings between UNHCR and Nordic and Baltic donor countries.
- c. More forthrightly discussing tensions between UNHCR’s fundraising priorities and its critical voice on protection issues and asylum standards. While this tension will require ongoing balancing, how UNHCR positions itself publicly is key to its perceived legitimacy amongst its partners and ultimately its persons of concern.