1) Who are the “Unregistered”?

**Unregistered Syrian Refugees** are Syrians who are eligible to register as refugees with UNHCR but have not registered with UNHCR. This includes several sub-groups:

- Newcomers (entered Lebanon within past 30 days) who have not yet had the chance to register
- Refugees who have a registration appointment with UNHCR and are currently awaiting registration (this group is counted as part of the population known to UNHCR in all reports and are not considered as “unregistered” by UNHCR)
- Refugees who made a registration appointment with UNHCR but did not attend (“no show”)
- Refugees who want to register with UNHCR but have not been able to access registration (reasons for this differ – see below under “Access to Registration” section)
- Refugees who are in need of protection and/or assistance but do not want to register with UNHCR (reasons for this differ – see below under “Incentive to Register” section)

Groups who are NOT considered “Unregistered Syrian Refugees,” but are still persons of concern to the humanitarian community, may be confused with Unregistered Syrian Refugees, and/or may face many of the same challenges as Unregistered Syrian Refugees include:

- **Registered Syrian Refugees who do not have valid legal stay documents:** As per Lebanese law, registration with UNHCR does not provide refugees with the right to residence and work in Lebanon. Valid legal stay documents are not a pre-requisite for registration with UNHCR; therefore, Registered Syrian Refugees may face the same freedom of movement constraints and other challenges as Unregistered Syrian Refugees if they do not have valid legal documents. However, Registered Syrian Refugees will have access to greater legal protection and assistance via UNHCR in the case that they are detained.

- **Registered Syrian Refugees who do not have government-issued identity documents (e.g., Passport, Syrian national ID card):** The UNHCR Registration Certificate is accepted as proof of identity for access to assistance (e.g., by UNHCR partners, at hospitals), but Registered Syrian Refugees without government-issued identity documents face some of the same challenges as Unregistered Syrian Refugees with respect to obtaining legal stay visas, crossing checkpoints, accessing birth registration, etc.

- **Registered Syrian Refugees who have been “excluded” from the WFP food assistance:** All Registered Syrian Refugee families used to receive WFP food assistance. However, since the start of targeted assistance in October 2013 this is no longer the case. Field reports indicate that some refugees who received food previously are now self-reporting as “unregistered.” This may be because they believe that the exclusion from food assistance means that their registration was “cancelled” or it may be an attempt to receive assistance through other programs.

---

1. According to UNHCR Registration Unit (meeting with LHIF Coordinator on 28 May 2014), the average rate of “no shows” in February 2014 was 21% and the main reasons provided by individuals that UNHCR was able to reach via phone following a skipped appointment were work, medical, and some have returned to Syria.

2. It should be noted that there are also Syrians living in Lebanon who have not requested and are not in need of protection and/or assistance from UNHCR or the wider humanitarian community; these individuals are not considered to be persons of concern.
• **Lebanese Returnees**: As defined by the Government of Lebanon (GoL), returnees are Lebanese citizens who were living in Syria since 2006 or earlier and have returned to Lebanon after March 2011 as a result of the conflict. Returnees are not eligible to register with UNHCR because, legally, they are not refugees. The High Relief Commission (HRC), with the support of IOM, is responsible for humanitarian assistance to Lebanese returnees from Syria.

• **Palestine Refugees**: Palestine refugees who were living in Syria and are presently in Lebanon are not eligible to register with UNHCR; they fall under the mandate of UNRWA. UNRWA is responsible for providing assistance and protection to all Palestine refugees and others eligible for UNRWA services in Lebanon. Palestinians are considered as “others of concern” by UNHCR.

• **Vulnerable Lebanese**: Lebanese citizens are not eligible to register with UNHCR because they are not refugees. The Ministry of Social Affairs (MOSA), together with relevant line ministries and with the support of the international community, is responsible for assistance to poor and vulnerable Lebanese. The lead UN agency for supporting vulnerable Lebanese is UNDP.

• **Mixed-Nationality Families**: Mixed-nationality families have mixed legal status and associated mixed eligibility to register with UNHCR, based along patrilineal transference of nationality (in accordance with Lebanese and Syrian law).
  - **Syrian father, Lebanese mother**: The father and children are eligible for registration with UNHCR as Syrian Refugees. The mother is under the auspices of the HRC as a Lebanese Returnee and noted as a dependent “not of concern” by UNHCR. The children are eligible to register as Syrian Refugees regardless if the father is dead or alive.
  - **Syrian father, Palestinian mother**: The father and children are eligible for registration with UNHCR as Syrian Refugees. The mother is recorded as “others of concern” by UNHCR on the registration certification, but is not eligible for services; she is under the auspices of UNRWA as a Palestine Refugee. The children are eligible to register as Syrian Refugees regardless if the father is dead or alive. The husband and children of a Palestine Refugee from Syria also have access to UNRWA education and health services.
  - **Syrian mother, Lebanese father**: The mother is eligible for registration with UNHCR as a Syrian Refugee, but the father and children are under the auspices of the HRC as Lebanese Returnees. UNHCR will note the family in the record as “not of concern” and the mother may be eligible for certain household/family-level assistance, but the father and children are not eligible for education or healthcare assistance from UNHCR.
  - **Syrian mother, Palestinian father**: The mother is eligible for registration with UNHCR as a Syrian Refugee, but the father and children are under the auspices of UNRWA as Palestine Refugees. UNHCR will note the family in the record as “others of concern” on the registration certificate and the mother may be eligible for certain household/family-level assistance. The family, including the Syrian mother, are eligible for education and healthcare assistance from UNRWA.

**Syrians who have attempted to register with UNHCR but have been denied registration**: A very low percent (1.5% in March 2014) of Syrians who try to register with UNHCR are deemed ineligible for registration (see “UNHCR Registration Process” section below for further detail).

---

3 Information provided by LHIF members that are directly involved in protection and legal counselling for refugees, and as per LHIF discussion with UNHCR Registration Unit 2 June 2014.

4 As per UNHCR Registration Unit: In the few cases of Syrian refugee children with a Lebanese or Palestinian mother and a deceased Syrian father, the eldest child is generally registered as the “principle applicant” and the mother is noted in the record. The case would not be listed as a Child Headed Household, and a note-to-file is included to explain the situation.

5 LHIF Coordinator meeting with UNHCR Registration Unit, 28 May 2014.
2) Available Data on Unregistered Syrian Refugees

According to UNHCR registration statistics, as of April 17, 2014 there were 979,146 Registered Syrian Refugees in Lebanon and 47,480 Syrians awaiting registration.

As at the time of writing, there is no reliable data on the number of Unregistered Syrian Refugees currently in Lebanon. General estimates and media reports citing unnamed Lebanese officials put the number of Syrians living in Lebanon and not registered with UNHCR between 200,000 and 400,000, although the reliability of and sources for these estimates – which do not distinguish between those in need of protection and/or assistance and those not in need – are unknown (reportedly, government estimates may come from municipality lists or from figures of Syrians living in Lebanon pre-crisis).6

Indicative data from the humanitarian community includes:

- According to an MSF report published in February 2013, an estimated 41% of the total sample were not officially registered as refugees or displaced as of December 2012.7
- A Handicap International/Help Age survey in August 2013 found 14% unregistered.8
- An Oxfam assessment in August 2013 showed that 87% of Syrian and Palestinian households were registered with UNHCR and UNRWA, respectively, and 9% either wanted to register or were awaiting registration.
- Syrian refugee school enrolment “snapshot” data at the time of enrolment in 2013 to 2014 shows that around 5,500 (25%) of the over 21,500 refugees were not registered with UNHCR, nor pending registration, ranging from 8% in the South to 80% in Mount Lebanon.9
- Post Distribution Monitoring by WFP among beneficiary households between September 2013 and January 2014 indicated that 24% of households hosted Unregistered Syrian Refugees.10
- An LHIF member whose winterization program selected beneficiaries on the basis of need found that 20% of their beneficiaries were neither registered nor awaiting registration with UNHCR at the time of distribution in December 2013/January 2014 (includes some Palestinians).
- Data collected by the Danish Refugee Council (DRC) indicates that while 97% of newcomers assessed between October and December 2013 stated that they were planning to register with UNHCR, 50% remained unregistered as of March 2014 (3-6 months later).
- Winterization data from an LHIF member whose program focused on informal settlements (IS) indicated that 40-50% of the refugees living in IS were unregistered (up from 10% in summer 2013), based on refugee self-reporting of status. However, very preliminary findings from an ongoing verification and cross-checking exercise seem to indicate that a significant number of registered refugees may have been claiming to be unregistered, and that the percentage of IS populations who are unregistered may be closer to 20-25%.

UNHCR reports that lists of Unregistered Syrian Refugees are systematically reduced after cross-checking with the UNHCR registration database, through the elimination of those already registered and those with a registration appointment. Registered Syrian Refugees, Lebanese Returnees, and vulnerable

---

7 “Misery beyond the war zone: Life for Syrian refugees and displaced populations in Lebanon,” Medecins sans Frontieres, February 2013
8 “Non-registered refugees’ compared to registered refugees’ humanitarian condition,” Handicap International/Help Age, August 2013
9 Secondary data collected as part of the Lebanon Multi-Sector Needs Assessment (MSNA) Phase 1
10 Ibid
Lebanese may self-report as Unregistered Syrian Refugees if they feel it may provide an avenue to much needed assistance. Registered Syrian Refugees may also be self-reporting as Unregistered because they are genuinely confused or because they believe they are no longer registered (e.g., because they stopped receiving monthly food and NFI assistance as a result of targeting).

It is anticipated by LHIF members working with Unregistered Syrian Refugees that the highest numbers are found in the following areas:

- Areas located behind checkpoints through which government-issued identity documents or legal stay documentation is required to pass (e.g., Wadi Khalid and Arsal)
- Informal Settlements (notably in Bekaa)
- Pockets of single working young men (daily wage labor areas)
- Any area with a high concentration of recent arrivals (noting that many of these individuals may only be “temporarily unregistered” due to the fact that they are newcomers)
- Palestinian camps (some Syrian refugees have sought accommodation in Palestinian camps; for camps that are under security control, those who do not have the appropriate documents or legal status may face difficulties in reaching the registration centers)

Efforts taken to improve information on Unregistered Syrian Refugees:
UNHCR is aware of the lack of data about the number and location of Unregistered Syrian Refugees, as well as the need to improve understanding for the reasons why eligible refugees are not registered. In March 2014, the UNHCR Registration Unit introduced the “Inter-Agency Referral Form for Syrians Not Registered with UNHCR,” asking partners to provide information about cases or groups of Unregistered Syrian Refugees that they encounter in the course of their work so that UNHCR registration teams can follow up with these groups/individuals. From January to May 2014, the Protection Working Group has distributed material on registration to all members and posted materials to the UNHCR web portal, in an effort to increase dissemination of registration information. In addition, the UNHCR Registration Unit has initiated a “one-off desk review” asking partners to share whatever data and information they have about the unregistered refugee population. In June 2014, UNHCR released a note on “Fast Tracking and Enhancing Access to UNHCR Registration.” IOM also introduced a proposed/planned referral process for Lebanese Returnees in June 2014. These initiatives will hopefully provide a more detailed picture on the number of Unregistered Syrian Refugees, the scale of the various challenges surrounding registration, and allow for a more informed approach to the development of appropriate strategies.
3) UNHCR Registration Process

There is no prima facie refugee status for Syrians in Lebanon, but refugees also do not need to undergo a full refugee status determination process. UNHCR conducts an abbreviated process, based on criteria determined together with the Government of Lebanon. The registration interview applies safeguards to preserve the civilian character of asylum, and during the interview the applicant must tell why they came to Lebanon and why they can’t go back to Syria. There is a presumption in this process that Syrians who came to Lebanon during or after March 2011 are refugees and that Syrians who came to Lebanon before March 2011 are not refugees; however, it is important to note that this is a rebuttable presumption if, for example, the applicant now has a bona fide fear of return. There are currently four UNHCR registration centers in Lebanon where Syrians can present themselves in order to apply for registration: Beirut, Tripoli, Zahle, and Tyre. In general, refugees must go to the registration center twice, first to make an appointment for a registration interview and second for the registration interview. Only one member of the family needs to go to make the appointment, but all members of the household are expected present themselves for the interview.

According to the UNHCR Registration Unit, the registration process and criteria are as follows:

- **Appointment:** In Beirut, Tripoli and Tyre, refugees must go in person to the registration center to take an appointment. Only one member of the family needs to present. In Zahle, refugees must make the appointment by phone because security restrictions from the municipality prohibit in-person appointments (UNHCR has recently put more operators on the registration hotline in Zahle to make it easier to get through). Appointments can also be given and fast-tracked based on referrals of cases from partner organizations.
  - A certain number of interview slots every day are reserved for “urgent cases” that need to be seen for interview on the same day that they make the appointment. Urgent cases are those with “visible specific needs” (e.g. 8-9 months pregnant, deportation order, persons with disabilities, unaccompanied minor/elder, etc.). Determination if a case is urgent is done by the reception staff who make the appointment. They are trained to identify urgent cases, but ultimately it will depend on how much information the refugee shares with the reception staff (noting that appointments are not given in a confidential area so refugees may not want to share sensitive information).

- **Registration Interview:** All members of the family are expected to present themselves for the registration interview. Photographs and iris scans are taken of all family members. The interview takes an average of 45 minutes and is based on standard registration questions used globally by UNHCR, adjusted for Lebanon. Information collected includes basic bio-data such as date of birth, as well as religion, ethnicity, place of origin, why they left Syria, why they can’t go back to Syria, and particular protection needs. Interviewers also identify specific or “visible” needs primarily based on information provided by the refugee or on what can be observed. Interviewers are trained to flag potential “persons with specific needs” for community services follow-up (for example, potential domestic violence cases).
  - Interviewers ask about some things that would be important to know as part of a formal Refugee Status Determination process, such as religious and ethnic profile or military history. UNHCR reports that refugees have expressed concerns about such questions,

---

11 This section has been reviewed for accuracy by the UNHCR Registration Unit.
12 LHIF meetings with UNHCR Registration Unit, 28 April 2014 and 2 June 2014; UNHCR Registration Leaflet 131106; UNHCR “Fast Track Registration and Enhancing Access to UNHCR Registration” information sheet, 8 May 2014
13 As per UNHCR, phone appointments are not available country-wide because in the past there was abuse of this system, e.g., with people telling refugees they could get them a faster appointment if they paid money, etc. This was especially a problem in the North.
especially if they have been subject to persecution in the past, but that interviewers are trained about how to ask and react to these questions in ways that allay concerns.

- **In-depth Interviews**: Certain cases require a more thorough interview process before they can be registered, including:
  - **Undocumented**: Individuals who do not have documents to substantiate their identity or nationality will undergo a nationality and family composition assessment. This is a longer interview (ranging from 45 minutes to 2 hours) involving protection, child protection, registration, and community services. Specific questions are asked about the place of origin that a person from that location should know. Separate interviews are conducted for husbands and wives. For undocumented children, interviews with 2 adults are required; if 2 adults are not available the case is referred to the UNHCR Community Services Unit and flagged for urgent follow-up with a home visit.
  - **Potential Combatants**: In order to preserve the civilian character of asylum, individuals who may be active combatants or who only recently renounced their arms will undergo a more thorough interview process before determining if they can be registered. The initial interviewer may flag a case as a potential combatant based on multiple indicators. Once flagged, the case is referred to more senior registration staff for a combatant assessment, which follows a very strict SOP (in which “benefit of the doubt” still applies). If deemed ineligible for registration, the applicant is counseled on the result and on the fact that it is possible to re-apply in the future.

- **Alternative Registration Options**: For individuals who are unable to approach the registration center for valid reasons, UNHCR provides the possibility of mobile registration and registration “in absentia,” although capacity and resources to provide these options is limited.
  - **Mobile Registration in Communities**: In the case where a large number of Syrians are unable to leave the area where they are living in order to travel to the registration center, UNHCR can organize a mobile registration mission to the area. However, this option has high costs and has, in the past, resulted in a relatively low number of registrations; it is also limited by security considerations for UNHCR staff and the refugees themselves.
  - **Mobile Registration for Vulnerable Individuals**: In cases where an individual has a serious medical issue or disability, or has been detained by Lebanese authorities, UNHCR can send a mobile registration team to their home or hospital, or to the detention center, to undertake the registration interview. This is a time-consuming process, but such cases are “fast-tracked” and generally occur within one week from the referral.
  - **Registration in Absentia**: Refugees can be registered in absentia by their immediate family members if the family can present the appropriate documentation at the registration center. The family must present either a medical/disability report from an approved partner in the area of Lebanon where they are living, or a Syrian government-issued disability card. There are strict criteria on the documents that will be accepted for registration in absentia in order to prevent fraud or mis-registration. Undocumented cases will generally not be registered in absentia; individual mobile registration would be the preferred alternative in such cases.

---

14 “Combatant” here refers to any person directly participating in hostilities, regardless if part of governmental forces or armed opposition groups.
• **Cases Not Eligible for Registration:** There are many layers of review before a case is deemed ineligible for registration. Only 1.5% of cases were ineligible in March 2014, which indicates that there is likely more of a problem with perceptions of who can or cannot register than with actual cases being ineligible. It should also be noted that exclusions apply only to the individual, not to the entire family. Reasons for ineligibility may include:\(^15\)
  - **Combatants:** Individuals who may be active combatants or who may have not permanently renounced their arms (see section on potential combatants above). The family of a combatant is eligible to register.
  - **No fear of return:** Individuals who have no fear of return to Syria. Note that if there are protection concerns or concerns about future persecution in Syria or Lebanon (e.g. LGBT), even if the individual claims or appears to have no fear at present or to have an intention to return, the case would still be registered.
  - **Not Syrian:** UNHCR’s registration mandate does not cover all persons displaced or affected by the Syrian conflict. UNHCR practice is to refer Palestinian refugees to UNRWA for follow up, Lebanese returnees to IOM, and vulnerable Lebanese to MoSA.
  - **Mixed-nationality Families:** Members of mixed-nationality families who are legally of Syrian nationality are eligible to register with UNHCR; members who are Palestinian are noted as “others of concern” by UNHCR and referred to UNRWA; members who are Lebanese are noted as “not of concern” by UNHCR and referred to HRC/IOM or MoSA. However, it is important to note that the children of a Syrian father and a non-Syrian mother are legally Syrian and eligible to register with UNHCR regardless if the father is deceased or absent.

• **Registration Certificate:** Once registered, Syrian refugees are issued a certificate from UNHCR that is valid for 2 years (following which time it must be renewed through a “verification” process). Note that prior to July 2013, refugees were issued certificates with 1 year validity. The UNHCR Certificate provides access to certain forms of assistance, such as access to emergency health care and legal assistance in case of detention, and may be accepted as proof of identity by some authorities; however, it does NOT provide refugees with a legal right to residence or work in Lebanon. Note that the Government of Lebanon has never agreed for UNHCR to grant asylum status for Syrians (as was done for Iraqis).\(^16\) Registration cases may be inactivated after a certain period of no contact/no show, but will be re-evaluated upon re-contact and can be reactivated immediately.

• **Common misconceptions about eligibility for registration:**
  - **Date of arrival in Lebanon** (e.g., before March 2011) is not in itself a reason for ineligibility. As noted above, there is a presumption that Syrians who arrived in Lebanon before March 2011 are not refugees, but other facts of the case indicating refugee status and a need for international protection prevail over this presumption. Individuals who arrived prior to March 2011 and want to register with UNHCR should apply.
  - **Undocumented** refugees must undergo additional interviews and assessment, but being undocumented is not in itself a reason for ineligibility.
  - **Single Men** are eligible to register.
  - **Migrant Workers** are eligible to register if they have become ‘refugees sur place’ (e.g., if they now have a legitimate fear of return).

---

\(^{15}\) According to the UNHCR Registration Unit, the main reasons for rejection are because the applicant is already registered or because the applicant is Lebanese.

\(^{16}\) Information provided by LHIF members that are directly involved in protection and legal counselling for refugees. Although most Iraqis have been resettled, there are still around 9,000 Iraqi refugees in Lebanon, and their situation is very difficult. They do not have “entry coupons” like Syrians, and must instead have formal documentation (i.e., passport). This is also the case for Sudanese and Ethiopians.
- **Stateless or nomadic persons** from Syria are eligible to register. Their country of origin will be recorded as “Syria,” and their nationality will be recorded as “stateless.” Registration for stateless persons follows the normal registration procedures; if they are undocumented it will follow the normal procedure for undocumented refugees.

- **Travel to and from Syria** does not make an individual automatically ineligible for registration and will not result in automatic de-registration.
3) Process for Regularizing Status with the Government of Lebanon

As mentioned above, registration with UNHCR does not provide refugees with a legal right to stay or work in Lebanon. Residence and work permissions can only be granted by the Government of Lebanon, thus it is important to distinguish between having valid legal stay documents from the Lebanese government and registration with UNHCR.

Entry of Syrian refugees into Lebanon via official border crossings is governed by the principles of free movement of goods and people as per the 1993 bilateral agreements between Lebanon and Syria. These require 1) adequate identity documentation, and 2) not being on the “entry ban” list. Syrian refugees can be and are denied entry if they do not have:

- National ID for those above 15 (can also be rejected if the ID is worn or damaged)
- Family booklet/civil extract for children under 15
- Birth certificate for newborns
- Consent from father/legal guardian (in case of unaccompanied minor)\(^{17}\)

According to the September 2013 Protection Sector strategy, “Refugees are subject to the same provisions in domestic law that applies to other foreigners. While Syrians currently benefit from favorable bilateral agreements permitting entry and work, the absence of an administrative framework means that those refugees in violation of the 1962 Immigration Law (due to unofficial entry or expiry of legal stay) may lack legal protection against arrest, prosecution and deportation.”

Syrian refugees who enter Lebanon through an official border point with a valid national Syrian identity card or passport receive an “entry coupon” and “entry stamp” that grants legal residency for an initial period of 6 months (for free), and can be renewed free of charge for an additional 6 months at any regional General Security Office (GSO). After 1 year all individuals must renew their residency with GSO, at a cost of US$200 per person/per year for everyone 15 and above. This cost is cited as the main reason why refugees who entered through official borders do not have valid stay permits. For refugees who enter through unofficial border points, it is possible to regularize their stay, but the cost – over $600 per person (LBP 300,000 renewal fees and LBP 650,000 fine) – is prohibitive. It is theoretically possible for refugees who have no government-issued identify documents to regularize their stay, but it is difficult and expensive (e.g., may require going to the Syrian embassy to get new documents). It should also be noted that even for refugees who have an entry coupon, renewals are at the discretion of General Security, so they can be denied even if they have all of the required documentation and funds.\(^{18}\)

If a Syrian refugee entered through an official border and has an expired visa, they can directly pay the required fees, which vary depending on the amount of months they have over-stayed the visa and depending on the individual General Security Office (GSO) they approach. They must at pay at least the standard LBP 300,000 renewal fee. Sometimes, the General Security Office does not permit the Syrian refugee to renew their residency and the refugee must submit a “plea of mercy.” If this is rejected they can be issued with a deportation or departure order. At present, the risk of detention is low for Syrians in the case of an expired visa.\(^{19}\)

\(^{17}\) Information provided by the UNHCR Inter-Agency Coordination Unit.

\(^{18}\) Information provided by LHIF members that are directly involved in protection and legal counselling for refugees.

\(^{19}\) Ibid.
If a Syrian refugee is detained by GSO for illegal entry, or approaches a GSO in order to regularize their status, they are likely to be transferred to a GSO detention centre in Beirut. If they have no criminal record, the individual will have the opportunity to regularize their status, by submitting a “plea of mercy” and paying a fine of LBP 650,000 and the LBP 300,000 renewal fee if the refugee has been in Lebanon for more than a year. If the “plea of mercy” is rejected or if they are unable to pay the fine, then a deportation order or a departure order will be issued. However, reports indicate that since mid-2012, deportation orders are not being enforced. If a Syrian refugee is detained for a crime (or a crime and illegal entry), after the refugee has served their sentence they can technically apply for a “plea of mercy” in order to regularize their stay. In practice the pleas of mercy are not being accepted by the GSO in cases where there has been a criminal conviction. It is common practice that a deportation order will be issued with a ban of entering Lebanon for at least 5 years.²⁰

According to a Norwegian Refugee Council (NRC) study on the consequences of limited legal status, refugees who do not have valid legal stay documents face challenges with respect to freedom of movement, in particular through checkpoints, which affects access to assistance (notably healthcare), as well as affecting access to registration (i.e., not being able to get to registration centers). Refugees with limited legal status may also be more vulnerable to exploitation due to a fear of going to the police or reporting violations, and be unable to access official birth registration for children.²¹

**Documentation-related Risk Factors for Syrian Refugees:**

| 1. No government-issued identity documents | 2. No valid stay visa for Lebanon (est. at 30%) | 3. Not registered with UNHCR (% unknown; anecdotal reports suggest max. 25%) |

*Individuals who have none of the abovementioned documents should be considered at greatest risk, with the least legal protection, limited freedom of movement, and the most constraints on access to assistance.* Individuals who are undocumented and/or without legal stay permits but registered with UNHCR have legal and freedom of movement constraints, but greater access to assistance and legal protection/assistance via UNHCR. Individuals who are legally in Lebanon but not registered with UNHCR will have difficulties accessing assistance available to refugees, such as healthcare, education support, food and cash assistance (see below on access to assistance).

²⁰Ibid.

²¹“The Consequences of Limited Legal Status for Syrian Refugees in Lebanon,” Norwegian Refugee Council (NRC), March 2014. Note from UNHCR: Limited legal status is a barrier for completing the official procedure to register the birth in the Register for Foreign Persons, although it may not impede the acquisition of a birth certificate from the Mukhtar.
4) Access to Registration

The available evidence from multiple organizations shows that the majority of Syrian refugees are not encountering significant problems in registering with UNHCR. For those who are facing difficulties accessing registration, there are multiple factors, some of which are interlinked. Lack of information/misconceptions, transportation issues, and freedom/fear of movement, are the most frequently reported. Country-wide protection monitoring between November 2013 and January 2014 anecdotally indicated that the three main obstacles to registration were that refugees did not see any benefit in it, that refugees were not aware of the procedures, and that transportation to the registration centers was too costly. A May 2014 survey conducted by UNHCR with newly registered Syrian refugees reported that 4% had challenges with the registration centre being too far or too costly to reach. An NRC assessment conducted between June and October 2013 in Wadi Khalid and Aarsal notes that access to UNHCR registration centers is in some cases hindered by the need to cross checkpoints (especially for refugees without legal stay permits), and according to a November 2013 UNHCR survey with new arrivals to Aarsal who did not show up for their registration appointments, 14% indicated that freedom of movement issues prevented them from reaching the registration centre.

As mentioned above, alternative modalities are available for refugees who may not be able to get to the registration center, but these options are not available at all times or in all areas. These alternative modalities include: mobile registration (individual or community-level), mobile appointments and hotline numbers to make appointments (limits the number of times refugees need to travel to the registration center), bussing to registration centers, and registration in absentia. Access to these modalities differs across the country and may be based on geographic proximities of refugee populations to different UNHCR field offices, locations where there are high concentrations of unregistered refugee populations, new influxes of refugees in different areas, security risks for registration staff themselves, knowledge of these modalities by referring partners, and time-cost analysis done on an ad-hoc basis or as a result of lobbying by different partners.

Specific access constraints highlighted in various assessments and reported by refugees include, but may not be limited to:

**Lack of Information/Misconceptions:**
- Not knowing what documents are required or believing that they do not have the necessary documentation (e.g. thinking that a passport or national ID card is required for registration, that broken ID is a problem, that persons without documents cannot register, that children cannot be registered without a family card, etc.).
- Thinking that legal stay is a requirement for registration.
- Not knowing where the registration centers are or what the process is.
- Misunderstandings about who can register (e.g. thinking single Syrian men cannot register).
- Confusing UNHCR registration and legal stay in Lebanon.
- Confusion about assistance hotlines (for different services, agencies and areas).

Interestingly, some of these constraints, which NGOs report encountering among refugees as of spring 2014, are similar to (although perhaps not at the scale of) those highlighted in a December 2012 MSF survey which showed that “41% of the interviewees said they were not registered mainly because they
lacked information on how and where to register or the registration points were too far away. Others worried that they did not have proper legal papers and would be therefore sent back to Syria.”

UNHCR is taking steps to reduce misconceptions and misunderstandings among the refugee population, for example: introduction of the soon-to-be-released Inter-Agency Q&A for Lebanon (INQAL); dissemination of information to Field Offices, Refugee Outreach Volunteers, and partners; expanded registration leaflets and posters; and messages via SMS and BBC media-action infomercials.

**Transport/Mobility:**
- Lack of transport or inability to afford the transportation costs to reach the registration center (e.g., in Akkar / Wadi Khaled it can cost up to $60 to travel to Tripoli).
- Difficulties of bringing all the family members to the registration point. For example, in some rural areas, refugees have reported that the fact that there was a person with limited mobility or in need of constant care has prevented them to access the registration point. This is also confirmed by protection monitoring actors.

UNHCR supports bussing operations in Mt. Lebanon (through TdH-Italia) and South Lebanon (through SHIELD) for: “more vulnerable Syrian refugees; those who find transport costs to registration centers prohibitive; those who live far from registration centers; [and] those who have protection/security concerns in Lebanon.” However, in addition to the fact that these services are not available country-wide, partners report that there are often long waiting lists (according to NGOs, about 1 month once added to the list) for these services and that there isn’t capacity to support all in need.

**Checkpoints:**
The UNHCR registration site in North Lebanon is located in Tripoli and so refugees based in Wadi Khalid have to cross several checkpoints, including the Chadra checkpoint to get there. The Bekaa UNHCR registration site is located in Zahle and so refugees based in Aarsal have to cross several checkpoints as well. Even in Beirut/Mt. Lebanon, the registration center in Inhah requires crossing official or unofficial checkpoints for some refugees. INGO monitoring has anecdotally indicated a potential correlation between Unregistered Syrian Refugees and refugees without legal stay permits, due to restrictions on their freedom of movement.

Issues crossing checkpoints include:
- Individuals with limited legal status do not have the documentation required to cross certain official checkpoints, and in some cases may adopt risky coping mechanisms to be able to cross (such as using other people’s IDs, paying bribes or crossing unofficially).
- Refugees in Wadi Khalid and Aarsal report that they are afraid to cross both official and unofficial checkpoints to access UNHCR registration centers due to a fear of harassment and arrest (particularly for individuals with limited legal status).

UNHCR has provided mobile registration behind checkpoints in a limited number of cases. UNHCR reports that this mechanism is not more widely used because:

---

22 “Misery beyond the war zone: Life for Syrian refugees and displaced populations in Lebanon,” Medecins sans Frontieres (MSF-CH), February 2013, pg. 4
23 UNHCR “Fast Track Registration and Enhancing Access to UNHCR Registration” information sheet, 8 May 2014
24 This section has been confirmed by TdH-Italia.
25 LHIF meeting with UNHCR Registration Unit, 28 May 2014
• It is a high cost for a relatively low number of registrations (mobile registration ends up with a lesser completion rate due to the limited working hours when on mission)
• Not many referrals received from partners, or referrals for cases that are not eligible (e.g., Lebanese returnees; already registered Syrians)
• Security situation for UN staff (and in some cases refugees) prohibits (e.g. in Bekaa)
• Importance of avoiding the misperception of a UNHCR bias where communities are ethnically divided (i.e., which area gets mobile registration and which does not)

Other issues reported by LHIF members:
• Many refugees are not aware of the option for registration “in absentia,” what documentation is required for this, and/or how to obtain the necessary documentation.
• Hotline problems: Beneficiaries report that it is not possible to get through on the various UNHCR phone numbers, such as the registration appointment hotline in Bekaa. **Note:** UNHCR has recently added more operators in Bekaa to help alleviate this issue.
• “Gate-keeping”: There have been some reports that UNHCR staff may – intentionally or unintentionally – discourage certain groups from trying to register (e.g., migrant workers).
• There are reports that some refugees are reluctant to register because they have been told or are under the impression that they must pay (e.g., $50) to get an appointment.26
• Limited hours of registration centers (although UNHCR reports that registration centers are open as early as 07:00 and up to 16:00/17:00, and longer when needed).
• Reports of mistreatment at the registration centers, or feeling insulted or humiliated.

Persons with specific needs:
Under-registration of persons with specific needs corroborate the challenges around access, as it is understood that persons with specific needs may be further hindered by their particular vulnerability. A Handicap International (HI)/Help Age International assessment found at least 20% of refugees in Lebanon are living with an impairment (6% with a severe impairment) whilst the total number of Registered Syrian Refugees with disabilities is currently 1.8% of the total registered populations (per UNHCR as of 16 May 2014).27 Particularly for those living with intellectual or sensorial impairments, their impairments are less likely to be identified or recorded. Furthermore, amongst the refugees with disabilities that are recorded, a significant percent (32%) of the disabilities are “unspecified.” Older people are also under-registered when compared to other groups (5% of refugee per HI findings vs. 2.7% of Registered Syrian Refugees). It is assumed that these issues are compounded for persons with specific needs who also lack government-issued identify documents or do not have valid legal stay documents.

26 **Note:** In all UNHCR information material, emphasis has been put on the free nature of registration and services provided by the humanitarian community.
27 **Note:** At the registration level, UNHCR identifies PWSN on preliminary grounds, which only captures what is visible and/or what is shared by the refugees with the case worker.
5) Incentive to Register

As most agencies have primarily focused on providing assistance to Registered Syrian Refugees, there is limited quantitative data available regarding the particular reasons Unregistered Syrian Refugees have for “voluntarily” choosing to remain unregistered (i.e., not willing to register despite having access). Apart from a limited number of assessments conducted using a relatively small sample size, most evidence regarding refugee’s reasons for choosing to remain unregistered comes from field teams’ ad hoc interaction with this population during the implementation of activities. Anecdotal partner reports from unregistered populations in IS indicate that main reasons for not registering include not only that it is too difficult/costly/risky to travel to registration centers (as discussed above), but also fear that the information provided may get into the wrong hands or be used against them or family members remaining in Syria and the belief that there is no real benefit to registering. An assessment conducted by HI in August 2013 found that approximately half (51%) of all Unregistered Syrian Refugees surveyed in North Lebanon and Bekaa were not registering because they either felt that they did not require assistance or they had a fear of persecution.

Do not see the Benefit of Registering:
Refugees may have a lack of understanding about the full benefits of registration (beyond monthly food and NFI assistance), such as access to health care, education and certain legal assistance. Some refugees feel that it is not worth registering:
- Surveyed refugees who have been “excluded” from food/NFI assistance report advising new arrivals against registration as they do not see the benefits or do not expect any improvement in their living conditions following registration.
- Person with specific needs reported feeling that there are no specific services or support provided via UNHCR registration and partners’ services to address their particular problem, which discouraged them from attempting to register.

As mentioned above, country-wide protection monitoring between November 2013 and January 2014 gave the top-reported reason for not registering as refugees did not see any benefit in it.

Fear of Registering:
According to reports from INGO field staff, reasons cited by refugees for not registering with UNHCR include fear of reprisal against their family members still living in Syria (e.g., by associating themselves with perceived ‘anti-regime’ institutions, such as the UN), fear that information would be sent back to Syrian authorities who would then force them into military service, and fear that they will be deported and sent to a refugee camp. An Oxfam assessment from August 2013 indicated that the main reported reason for refugees not wanting to register with UNHCR was fear that if they registered with UNHCR, they would not be allowed to go back to Syria. Some refugees also appear to be fearful of sharing any information with perceived “authorities.” Additionally, some partners report that refugees have cited the registration interview questions about religious/political/social affiliations or military history as a reason why they do not want to register.
6) Access to Assistance

One of the primary benefits of registration is increased access to assistance. This manifests both with respect to eligibility for certain assistance being limited to Registered Syrian Refugees, and with respect to difficulties in identifying beneficiaries in need who are outside of the UNHCR refugee database. There are also concerns that providing too much assistance to Unregistered Syrian Refugees would increase the disincentive to register, and thus leave even a higher proportion of the population without the legal and protection support available via UNHCR. However, it is also recognized that refugees who will never register due to fear of reprisal and similar concerns must be provided with access to assistance on the basis of their need (regardless of status). For affected persons who are not eligible to register with UNHCR (e.g., Lebanese returnees, vulnerable Lebanese), are unable to register (e.g., due to access), or are unwilling to register (e.g., due to fear), alternative mechanisms are required to both ensure that their needs are identified and that they have access to assistance.

While most UNHCR support is targeted to Registered Syrian Refugees, Unregistered Syrian Refugees do have access to some assistance, primarily through bilaterally-funded I/NGO programs, but also from UN agencies (e.g., WFP one-off newcomer food parcels). As assistance to Unregistered Syrian Refugees is not systematically mapped/tracked, and there is no common database of unregistered beneficiaries or representative needs assessment that speaks specifically to Unregistered Syrian Refugees, it is difficult to assess the extent of assistance gaps.

Assistance available to Unregistered Syrian Refugees is considerably limited by funding constraints, but includes:

- Newcomer Assistance Program (one-off food and NFIs within first month of arrival)
- Voucher programs for hygiene and baby kits
- Winterization assistance
- In-kind Shelter and WASH interventions
- Support for persons with disabilities and specific needs
- Protection services and legal counseling (including child protection interventions)
- Support for victims of torture
- ICRC family tracing and reunification
- Community Centers and SDCs
- Limited access to health care (see below)
- In near future, limited unconditional cash assistance

Legal Assistance:
While legal assistance in the case of detention is limited to Registered Syrian Refugees, UNHCR provides legal assistance and counseling through INGO implementing partners regardless of registration status.

Access to Health Care:
According to UNHCR, emergency health services are available to refugees awaiting registration and “appointment slips are valid replacements of registration certificate until date stated on slip.” Additionally, UNHCR states that it covers 75% for the first 48 hours, pending fast-track registration: “[i]f a refugee is not registered and has a life-threatening condition – GML [Globe Med] approves admission and stabilization of the patient, and sends a request for registration to the relevant Registration Unit...”
within 48 hours. If the patient is considered to be of NO concern to UNHCR, GML/UNHCR immediately ceases support from that point onwards and settles the hospital bill incurred.”

**Primary Health Care (PHC) assistance for Unregistered Syrian Refugees:** Some UNHCR field offices permit their implementing partners to offer limited PHC support for Unregistered Syrian Refugees, such as vaccinations for children, care for newborn babies, consultations for pregnant women (ANC), and treatment for communicable diseases. However, this is not a country-wide policy; each UNHCR field office must determine if it has the financial resources to provide this support and what PHC services it will cover. In addition, provision of this support by UNHCR implementing partners reportedly requires “proof of status,” such as a Syrian national ID card, Syrian birth certificate, or letter from the municipality. Further, the limited nature of this support, which does not include such things as diagnostic tests and only applies to care that can be provided at the clinic-level, may result in incomplete care. Non-UNHCR funded NGO health programs/clinics do provide support for Unregistered Syrian Refugees. In some cases, these clinics support any population in need regardless of status, but for some programs “proof of status” as a Syrian refugee may also be required (per donor regulations).

**Secondary Health Care (SHC) assistance for Unregistered Syrian Refugees:** INGOs report that some hospitals ask Syrian refugees for deposits prior to admission and that Lebanese Red Cross ambulatory services may be becoming reluctant to pick up Syrian patients because often hospitals won’t accept them. However, these problems appear to affect both Registered and Unregistered Syrian Refugees. In 2013, cases of Unregistered Syrian Refugees in need of SHC were fast-tracked through the registration system, but it is unclear how this system is working since the UNHCR switch to a private-sector health insurance company (Globe Med) for SHC coverage for Syrian refugees. Two hospitals provide free SHC for Syrian refugees, one in Akkar and one in Arsal, but these hospitals do not provide all services and are not fully functioning on a regular basis.

**Coping Strategies:**
Available data shows that many Syrian refugees rely on negative coping strategies when they are not able to meet their basic needs through employment or assistance. Assessments generally show that the main food-related coping mechanisms used by Syrian refugees are to buy less expensive food and reduce the number of meals per day. Other negative coping mechanisms include, for example, selling assets, spending savings, buying on credit and accruing debt, exploitative labor, using other people’s IDs, or paying bribes. Risks of negative coping mechanisms are higher for vulnerable Unregistered Syrian Refugees given their limited access to assistance.

**Coordination of Assistance:**
Phase 1 of the Lebanon Multi-Sector Needs Assessment (MSNA) showed that assessments and data collection in Lebanon are overwhelmingly focused on Registered Syrian Refugees, above all other target groups. Overall, improved common mechanisms are needed to systematically collect, track and compare needs and coverage across all of the various target groups in the response (Registered Syrian Refugees, Unregistered Syrian Refugees, Lebanese Returnees, Palestinian Refugees from Syria, vulnerable Lebanese, and Palestinian Refugees in Lebanon).

---

29 “Health Services for Syrian Refugees in Mount Lebanon and Beirut,” UNHCR, May 2014
30 Information provided by LHIF members directly involved in health services provision for Syrian refugees.
31 Ibid.
For Unregistered Syrian Refugees in particular, coordination of information collection, needs/gap analysis, and assistance is complicated by the fact that there is no focal point agency for them, they can be hard to identify within the population, information collected to-date about Syrian refugees generally does not disaggregate between registered and unregistered, and inaccurate self-reporting by beneficiaries as mentioned above. At present, each agency working with Unregistered Syrian Refugees has its own individual database for tracking its beneficiaries, and these databases are unlikely to be compatible in many cases.

Current efforts to better coordinate assistance for Unregistered Syrian Refugees are underway in the Cash, NFI and Shelter Working Groups. For example, it has been proposed by some actors that a common database for Unregistered Syrian Refugees be created (with caveats on data confidentiality and protection concerns), and that the same targeting criteria for unconditional cash assistance be used to identify Unregistered households as will be used to target Registered households, as well as that cash assistance be harmonized so as to provide minimum support to Unregistered households whilst balancing the risk of disincentive to register.