EVALUATION



CATALYSING CHANGE: EVALUATION OF FINLAND'S HUMANITARIAN ASSISTANCE 2016-2022

Volume 2 · Case studies



Evaluation of Finland's Development Policy and Cooperation



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EVALUATION

EVALUATION OF FINNISH HUMANITARIAN ASSISTANCE 2016–2022

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Lead Company

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REGIONAL CASE STUDY ANNEX - SYRIA

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Acronyms and abbreviations

3RP Regional Refugee and Resilience Plan

CBPF Country Based Pooled Fund
CSO Civil Society Organisation

ERP Lebanon Emergency Response Plan

EU European Union

EUR Euro

GBV Gender-Based Violence

GEWE Gender Equality and Women's Empowerment

HRP Humanitarian Response Plan

ICRC International Committee of the Red Cross

IDP Internally Displaced Persons

IFRC International Federation of the Red Cross and Red Crescent Society

JRP Jordan Response Plan for the Syria Crisis

LCRP Lebanon Crisis Response PlanMFA Ministry for Foreign Affairs of FinlandNGO Non-Governmental Organisation

UN United Nations

UNDP United Nations Development Programme

UNFPA United Nations Population Fund

UNHCR United Nations High Commissioner for Refugees

UNICEF United Nations Children's Fund

UNOCHA United Nations Office for the Coordination of Humanitarian Affairs

USD US Dollar

WASH Water, Sanitation and Hygiene
WFP World Food Programme



1 Introduction

This case study comprises one of three prepared for the Ministry of Foreign Affairs (MFA) Finland's Evaluation of Humanitarian Assistance 2016-2022. The other two case studies are of MFA's assistance to Bangladesh and South Sudan.

The purpose of each case study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation, while adapting their analysis for the specifics of the country context.

The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation;
- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it;
- To generate Lessons/Implications to help inform MFA stakeholders in their humanitarian assistance programming, as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

The Case Study is explicitly not a full evaluation of Finland's humanitarian assistance to the Syrian regional crisis, which would be beyond its remit. Accordingly, it does not provide Recommendations, but rather proposes some Lessons/Implications to support internal dialogue and learning.



2 Methodology

The approach and methodology for the wider evaluation is fully described in Annex 2 of the main evaluation report. This Case Study has applied the overarching evaluation questions, design and methodology of the wider evaluation, with adaptation for the contextual specifics of the Syrian regional crisis. The questions to which it contributes evidence are as follows.

EVALUATION CRITERIA	EVALUATION QUESTIONS
How <u>relevant</u> was Finnish humanitarian assistance to needs?	 To what extent was Finland's humanitarian assistance relevant to the needs of beneficiaries, considering available resources? To what extent was the assistance relevant to the needs of key stakeholders, including government, civil society and others? To what extent did the assistance adapt appropriately over time, including in relation to changing humanitarian needs?
How effective was Finnish humanitarian assistance 2016-March 2022?	 What results for beneficiaries and other stakeholders were delivered by Finland's humanitarian assistance? What results were delivered for non-discrimination, including gender equality and the empowerment of women and persons with disabilities? To what extent has Finland supported the promotion of localization of aid? To what extent has Finland been able to influence and promote Finland's Humanitarian Policy priorities in the multilateral organisations or Finnish Civil Society Organisations (CSOs) that are used to channel the humanitarian assistance?
How <u>efficient</u> was Finnish humanitarian assistance?	Is the management of humanitarian assistance flexible, adaptive and agile, and able to react appropriately to emerging crises?
How <u>coherent</u> was Finnish humanitarian assistance?	 External To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context? Internal To what extent does the current choice of funding channels contribute to the effectiveness of humanitarian aid, i.e. is Finland working with right partners, considering its Humanitarian Policy? To what extent has it been possible to establish synergies between different MFA cooperation modalities, i.e. international and national level partnerships of CSOs, International Non-Governmental Organisations (INGOs) cooperation when transitioning from humanitarian aid to development cooperation or peacebuilding and vice-versa? Are the various aid and cooperation modalities within MFA sufficiently coordinated to avoid duplication?
How connected was Finnish assistance to international commitments and to other forms of cooperation?	 To what extent did Finland's humanitarian assistance adhere to international commitments on the International Humanitarian Principles and Do No Harm? To what extent did Finland's humanitarian assistance establish links between humanitarian aid and development cooperation and/or peacebuilding efforts (the 'nexus')?



The theoretical framework for the evaluation combines theory-based evaluation (Chen 1990), with elements of contribution analysis (Mayne 2001) and a utilisation-focused approach (Patton 2008). It functions at aggregate level for the strategic evaluation and is applied to this case study through the structured tools applied (see Annex 2 of the evaluation report). This case study contributes to its specification, validation and interrogation as part of the wider evaluation.

The case study has adopted a structured and systematic approach, in accordance with the methodology for the wider evaluation. The main elements of the methodology applied are as follows:

- Quantitative analysis of Finnish assistance to the Syrian regional crisis for the period 2016-2022, generated from MFA statistics;
- Interviews with key Helsinki- and regionally-based stakeholders working currently on the regional crisis within MFA;
- Interviews with key partners in the region who either receive Finnish humanitarian assistance currently or have worked with it in the past;
- Systematic analysis of nine MFA-funded projects implemented in the region during the evaluation's time period of 2016-current against a structured analytical framework (see Annex 5 in Volume 1 of the report).

Interviews in the region were conducted by a Country Evaluator over the period March-April 2022, in collaboration with an international evaluation team member.

Limitations

Limitations of the case study are as follows:

- As a case study rather than a full evaluation, this report does not provide a definitive performance assessment of all Finnish humanitarian (or other) assistance to the regional crisis during the period 2016-current. Rather, it offers limited insights, generated through a systematic approach, to inform the wider evaluative process.
- As part of a strategic exercise, and given that Finnish humanitarian assistance within
 the scope of this case study is allocated to partners in the region, the case study does
 not include visits to individual projects or interviews/focus groups with direct beneficiaries.
- Finally, since Lebanon, from where the response is managed, is currently experiencing
 political upheaval and considerable social and economic difficulties, most interviews
 were conducted remotely even from within Beirut, as required by stakeholders at the
 current time. All interviews with interlocutors in Syria were conducted remotely due to
 security conditions.



3 Syrian regional humanitarian context

The Syrian regional crisis, in which Finland has a longstanding engagement, has been described as 'a complex humanitarian and protection emergency characterized by over 10 years of ongoing hostilities and their long-term consequences including widespread destruction of civilian infrastructure, explosive ordnance contamination and the largest number of internally displaced people in the world' (iDMC 2021). By March 2022, within Syria itself, 14.6 million people were in need of humanitarian assistance, an increase of 1.2 million from 2021 (UNOCHA 2022a). Acute difficulties in the surrounding refugee-hosting countries, notably political and economic crisis in Lebanon, have worsened the conditions for refugees seeking sanctuary outside their own frontiers.

Over more than ten years of extreme crisis, the civilian population within Syria have experienced the direct effects of conflict and, increasingly, economic deterioration and impacts of climate change. A 2020 Idleb ceasefire agreement led to an overall reduction in large-scale displacement, but hostilities intensified throughout 2021, particularly along frontlines across the northwest, northeast and south of the country. Civilian deaths from the crisis since 2011 are estimated at a minimum of 350,000 (BBC News 2021). As of early 2022, 6.7 million people were internally displaced within Syria (UNHCR 2021a).

The Syrian economy has shrunk by more than half since the onset of hostilities in 2011. Local currency exchange rates have undergone a 70-fold depreciation, with 2020 US sanctions adding to depreciation pressures (World Bank 2022). The combined effects of currency depreciation, soaring prices, reduced fiscal revenue and increasing domestic debt and widespread losses in livelihoods plunged new segments of the population into humanitarian need in 2020 (UNOCHA 2022a. Climate change effects are causing major challenges; in 2021, erratic rainfall in combination with low water levels in the Euphrates River reduced access to water for drinking and domestic use for over five million people, as well as triggering substantial harvest and income losses. Gender-based violence continues to be documented at high levels (UN Women 2022), and the continuation of armed hostilities significantly restricts women's and girls' freedom of movement. In 2022, the main drivers of humanitarian need in Syria arise from the ongoing conflict, the acute economic crisis, the effects of the COVID-19 pandemic, and the water crisis and drought-like conditions (UNOCHA 2022a).

In total, over 5.6 million refugees from the crisis were registered with UNHCR in late 2021 (3RP 2022a). Most refugees reside in the surrounding countries, with over 3.6 million registered refugees in Turkey, and over 800,000 and 650,000 registered in Lebanon and Jordan respectively, as of June 2022 (Table 1 below). Lebanon has the largest number of refugees per capita.



Table 1 Persons of Concern by Country of Asylum, March 2022

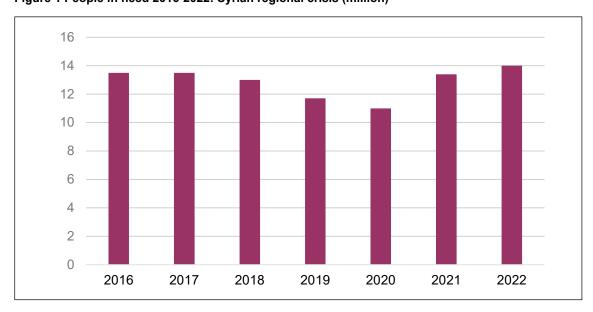
LOCATION NAME	SOURCE	DATA DATE	PERCENT	POPULATION OF PERSONS OF CONCERN (POCS)
Turkey	Government of Turkey	31 Mar 2022	65.7%	3,763,565
Lebanon	UNHCR	31 Mar 2022	14.7%	839,086
Jordan	UNHCR	31 Mar 2022	11.8%	674,268
Iraq	UNHCR	31 Mar 2022	4.5%	257,974
Egypt	UNHCR	31 Mar 2022	2.5%	140,789
Other (North Africa)	UNHCR	31 Dec 2021	0.8%	48,548

Source: UNHCR 2022

Externally, difficulties of hosting large-scale refugee populations have been compounded by host country difficulties. Lebanon has experienced major political upheaval and a currency crisis since late 2019. Social tensions with refugee communities have risen, and Lebanon itself has needed social and economic support for its population in need (UNOCHA 2021; UNOCHA 2022b; REACH 2022a; UNHCR et al. 2022). Both Lebanon and Turkey have also experienced major currency crises, with the Turkish Lira losing over 40% of its value in relation to the US dollar in 2021, introducing another economic shock and raising commodity prices (World Bank 2022a). The Lebanese Lira lost 82% of its purchasing power between 2019 and 2021 (L'Orient Today 2022).

Humanitarian needs both within Syria and externally are acute and rising in 2022, with 14.6 million people in need of humanitarian assistance, an increase of 1.2 million from 2021(UNOCHA 2022a) (Figure 1):

Figure 1 People in need 2016-2022: Syrian regional crisis (million)



Source: UNOCHA 2022a

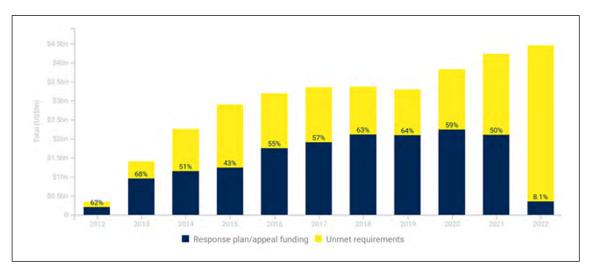


Vulnerable refugee populations; Syrian regional crisis

- 47% (2.6 million) of the registered Syrian refugees are children under the age of 18 (3RP 2022b).
- 9% of individuals were found to have a disability in Lebanon, 30% with physical or intellectual needs in Jordan, and 8% of Syrian refugees are considered to have disability in Egypt (3RP 2022b).

However, the UN and partners' annual Regional Refugee and Resilience Plan ('3RP') funding request for alleviation of the humanitarian suffering has consistently experienced shortfalls of around or above 50%. As of May 2022, only 8.1% of requested funding has been raised (UNO-CHA 2022a) (Figure 2).

Figure 2 Funding to the Regional Refugee and Resilience Plan 2012-current



Source: UNOCHA 2022c, May 2022



4 Evolution of Finland's humanitarian assistance to the Syrian Regional Crisis since 2016

Strategic framework Finland has developed two successive strategic frameworks in place for the Syrian crisis; the first focused on Syria and Iraq (Strategy for Development Cooperation and Humanitarian aid in response to the conflicts of Syria and Iraq, 2017-2020) and the second embracing the crisis as a whole (Finland's strategy for development cooperation and humanitarian assistance in the Syrian crisis 2021–2024).

The impact areas/strategic goals¹ of both strategies are set out in Table 2 below:

Table 2 Impacts and strategic goals: MFA Strategies for the Syrian regional crisis

2017-2020 IMPACT AREAS	2021-24: STRATEGIC GOALS
IMPACT 1: Improved conditions for inclusive transition and sustainable peace in Syria	1) the inclusiveness of the peace processes and accountability;
IMPACT 2: Dignified life for affected populations in Syria and improved conditions for the safe return of refugees and Internally Displaced Persons (IDPs) in stabilised areas	2) the promotion of gender equality;
IMPACT 3: Dignified life for Syrian refugees and host-community affected populations in Syria's neighbouring countries.	the promotion of resilience building and strengthening the humanitarian-development-peace nexus;
IMPACT 4: Sustained stability and resilience of communities in Iraq, enabling IDPs and refugees to return.	4) the promotion of the rights of people belonging to the most vulnerable groups; and
	5) the fostering of innovation in finding new solutions to humanitarian and resilience challenges.

Source: MFA (2017) and MFA (2021)

Both strategies combine approaches to humanitarian and development assistance. The 2021-2024 strategy in particular promotes a resilience-focused approach to the use of humanitarian assistance (goal 2) and innovation within humanitarian assistance (goal 5). Its three impact areas reflect both this direction and the five strategic goals: they are 1) peace building; 2) the enhancement of women's rights; and 3) the rights of children and rights of persons with disabilities and people with special needs.

¹ While the 2017-2020 Strategy has only Impact Areas, the 2021-24 Strategy contains a set of Strategic Goals supported by Impact Areas. The Strategic Goals are presented here, and the Impact Areas addressed below under Section 5.2 on effectiveness.



Finally, Finland states clearly in its 2021-2024 Strategy that it has no bilateral political-level contacts with the Syrian regime, and therefore its interventions are not based on a mutual agreement or approved national plan. Instead, Finland's contributions to the crisis are channelled through UN actors and, until 2020, through civil society actors (see section 4.2 below). It works within the EU's Regional Strategy for Syria and Iraq as well as the Islamic State in Iraq and the Levant (ISIL)/ISIS threat and the EU Strategy on Syria (2017) which provide a clear structure and guidance for member states' assistance.

4.1 Overall funding trends

Mapping Finland's humanitarian assistance to the regional crisis is complicated. The protracted nature of the crisis has given rise to international thinking on the 'humanitarian-development-peace nexus' and, operationally at least, many large-scale initiatives, for example in education and livelihoods support, require elements of both humanitarian and development thinking.

At the same time, Finnish assistance to the crisis has three main forms:

- 'Pure' humanitarian assistance, allocated by the Humanitarian Unit and recorded as such as MFA in its internal systems
- Development co-operation financing allocated from the relevant Regional Desk to organisations working on the crisis, which may have a humanitarian dimension (such as UNICEF or UN Women) but is not recorded as humanitarian assistance
- Development co-operation financing allocated by the Regional Desk to Humanitarian Unit for their use on the crisis (recorded as such in MFA systems)

Mapping these precise funding streams has not proven feasible within MFA systems. Accordingly, data from the MFA Humanitarian Unit is applied here, since this presents the most accurate – if the minimum – volume of assistance provided.

Applying MFA data, the total Finnish MFA humanitarian aid allocated to the regional crisis during 2016-2021 is EUR 87,701,012 (see Table 3). This makes the regional crisis the largest geographically-based recipient of humanitarian funding 2016- 2020, followed by South Sudan, Yemen and Somalia.²

² South Sudan EUR 33 million; Yemen EUR 29 million; Somalia EUR 21 million.



Table 3 Yearly allocation to Syrian Regional crisis)

YEAR	[EUR]	NO. OF PARTNERS
2016	20,300,000	8
2017	17,785,000	9
2018	14,350,000	6
2019	12,900,000	6
2020	13,700,000	4
2021	8,676,675	3
Total	87,701,012	36

Source: MFA Humanitarian Unit statistics

Contributions have gradually declined over time, from a high of EUR 20.3 million in 2016 to eight different partners (nine in 2017), to EUR 8.6 million in 2021, allocated to just three partners (Figure 5 below).

Contributions have been distributed both to the central co-ordination mechanisms in the form of the 3RP, and to individual countries suffering the effects of the crisis (Table 4).

Table 4 Geographical allocations

GEOGRAPHICAL ALLOCATION	VOLUMES (EUR)
Syria crisis	70,560,000
Iraq	11,329,337
Lebanon	4,076,675
Jordan	1,735,000
Total	87,701,012

Source: MFA Humanitarian Unit statistics

4.2 Finnish funding in relation to humanitarian needs

Given the scale of humanitarian needs in the region, Finland's contributions are relatively small in monetary terms. Using the 3RP as a proxy for scale of humanitarian needs, and with its contributions to the regional crisis declining gradually over time, Finland has allocated between 1.2% (in 2016) to 0.4% in 2021 of total 3RP contributions annually (Table 5; see also Table 6 below).



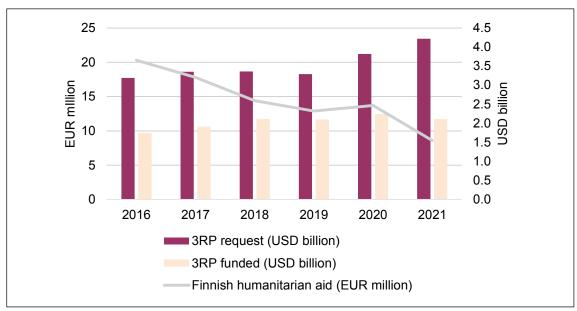
Table 5 Funding in relation to the 3RP

YEAR	3RP REQUEST (USD BILLION)	3RP FUNDED (USD BILLION) ³	FINNISH HUMANITAR- IAN AID (EUR MILLION) ⁴	FINNISH % OF HRP (DATA PER MFA)
2016	3,190	1,750	20.3	1.2
2017	3,350	1,910	17.8	0.9
2018	3,360	2,110	14.4	0.7
2019	3,290	2,100	12.9	0.6
2020	3,820	2,240	13.7	0.6
2021	4,220	2,110	8.6	0.4
2022	4,440	361		

Source: UNOCHA 2022c; MFA Humanitarian Unit statistics

Using two different scales, although the requests of the 3RPs have therefore increased over time (plum columns), Finnish contributions (line) have taken the opposite direction, of a gradual decline over time (Figure 3).

Figure 3 Finnish contributions against HRP needs



Source: UNOCHA 2022c; MFA Humanitarian Unit statistics

³ UNOCHA 2022c

⁴ Applying MFA data



The same pattern emerges (peach line) when mapped against the steady increase in the number of people in need (plum line) (Figure 4 below).

25
20
15
10
5
2016 2017 2018 2019 2020 2021 2022
People in need (million) Finnish humanitarian aid (EUR million)

Figure 4 Finnish assistance compared to people in need

Source: UNOCHA 3RP (2016-2022); MFA Humanitarian Unit Statistics

4.3 Recipients

Multilateral agencies have consistently been the largest recipients of Finnish humanitarian assistance, having received 63.5% (EUR 55.3 million) of the total Finnish humanitarian funding to the regional crisis in 2016-21. UNHCR is the single largest recipient at EUR 31 million over the period, followed by UNICEF at EUR 20 million, and WFP at EUR 11.8 million. UNFPA received 12.5 million.

The Red Cross movement was the second largest individual recipient, at EUR 24.7 million (28%). The six Finnish Non-Governmental Organisations (NGOs) received a combined amount of EUR 5.64 million (7.4%), spread across the six years of the period. Of these, the largest recipient was FinnChurchAid, at EUR 1.85 million, followed by Save the Children, at EUR 1.14 million (see Figure 5 below):



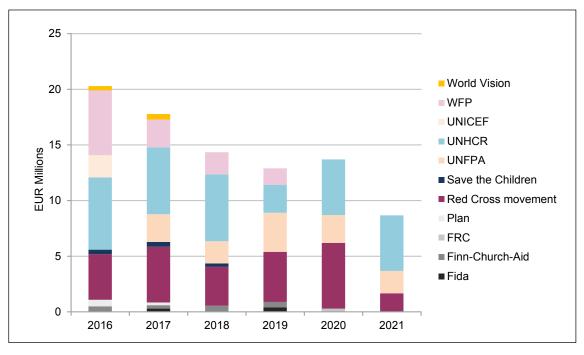


Figure 5 Allocation per partner per year

Source: MFA Humanitarian Unit statistics

By far the largest amounts of money were contributed as unearmarked assistance to Syria itself, allowing partner agencies to apply it according to needs. Of this, EUR 26.5 million was allocated to UNHCR, and therefore highly likely to have been used for protection needs, with an additional EUR 7.3 million also applied to protection, the bulk of which was for the Red Cross Movement and UNHCR. EUR 10.3 million was allocated to food assistance, via WFP. Table 6 below provides the breakdown.



Table 6 Allocation per partner and sector (EUR)

ORGANI- SATION	EDUCA- TION	FOOD AS- SISTANCE	HEALTH	MULTI- SECTOR	NON-EAR- MARKED TO SYRIA	PROTEC- TION - AID TO DIS- PLACED	PROTEC- TION - OTHER	GBV	WASH	GRAND TOTAL
Fida	400,000						300,000			700,000
FinnChurchAid	1,050,000			800,000						1,850,000
Finnish Red Cross (FRC)			300,000							300,000
Plan				835,000						835,000
Red Cross movement			3,876,675	18,300,000			2,500,000			24,676,675
Save the Children				1,140,000						1,140,000
UNFPA					9,500,000			3,000,000		12,500,000
UNHCR					26,500,000	4,500,000				31,000,000
UNICEF				2,000,000						2,000,000
WFP		10,310,000			1,500,000					11,810,000
World Vision				500,000					389,337	889,337
Grand Total	1,450,000	10,310,000	4,176,675	23,575,000	37,500,000	4,500,000	2,800,000	3,000,000	389,337	87,701,012

Source: MFA Humanitarian Unit statistics



5 Key findings

5.1 How relevant was Finnish humanitarian assistance 2016-March 2022?

5.1.1 To what extent was Finland's humanitarian assistance aligned with relevant policies and strategies in the context?

Conducive conditions for strategic relevance: The policy and operational context of the Syrian regional crisis presents highly conducive conditions ensuring the relevance of external assistance. The 3RP and its associated analyses provide internationally-accepted identification of needs, while its breadth of scope, and alignment with national policy priorities in all affected countries, means that the policy and strategic relevance of actors engaging with it, occurs almost by definition.

Strong alignment with the 3RP: Both of Finland's Regional Strategies for the period have aligned with the strategic aims of the 3RPs. That for 2021-2024 explicitly situates Finnish assistance within this wider framework, stating that *'Finland's humanitarian and development assistance to the crisis contributes particularly to wider peacebuilding efforts and to building resilience.* [core 3RP aims]' (MFA 2021). With 63.5% of Finland's total resources allocated to the multilateral agencies whose operations take place mainly via the 3RP, alignment with the wider process is virtually guaranteed.

Under the 3RP comes the Humanitarian Response Plan for Syria (HRP), which are generated on an annual basis. The goals of both Finland's successive Regional Strategies are aligned with the Humanitarian Response Plan (HRP), with their focus on dignified lives for affected populations within and outside in Syria (2017-2020) and the promotion of resilience building (2021-2024).

Alignment with national strategies and plans: On a country basis, Finland's assistance is also aligned with relevant national strategies of host countries surrounding Syria, such as the Lebanon Crisis Response Plan (LCRP) and Lebanon Emergency Response Plan (ERP), as well as the Jordan Response Plan for the Syria Crisis (JRP).

Under the LCRP, Finnish assistance aligns with the following priorities:

Objective 1: Ensure protection of vulnerable populations: Recognizing that the imperative of protecting women, girls, boys and men lies at the heart of humanitarian action, this response objective aims to strengthen protection services and interventions for displaced persons from Syria and other vulnerable populations, empower individuals and mainstream protection, gender, Gender-Based Violence (GBV), conflict sensitivity and environment across all sectoral interventions. It promotes protection of, and access to, affected people in accordance with relevant principles and instruments of international refugee and human rights law.



Objective 3: Support service provision through national systems: Ensure that all
children, including children displaced from Syria, can access, equally learn and be
retained in a quality learning environment (formal and nonformal), widening the
absorption capacity of gender responsive education premises (rehabilitation, expansion and construction), in addition to strengthening the education system to be able to
cater to all girls and boys, in line with the Ministry of Education and Higher Education's
Five-Year Plan.

The assistance is also in line with the ERP strategic priorities, specifically related to the education response:

Strategic Objective One: Direct community support to support the most vulnerable children to ensure continued learning. The main aim is to ensure that the most vulnerable Lebanese and migrant children, including children with disabilities, are reached and supported to access and continue learning despite the challenges faced due to the deteriorating economic situation.

Within the Jordan Response Plan, the assistance falls under the following key priorities (as well as education and Gender Equality and Women's Empowerment (GEWE) aims):

- Strengthening programme design and implementation to be more relevant to the needs and to reach the most vulnerable and contribute to contribute to eh enhancement of the resilience of both beneficiaries and Systems.
- Ensure meeting the protection needs of Syrian refugees and meeting the needs of vulnerable Jordanians impacted by Syria crisis.
- Support national systems to maintain providing quality services.

Programmatic alignment with relevant strategies and plans: Analysis of Finnish-funded projects and programmes in the regional crisis finds them all well-aligned with key relevant strategies and plans in the context. Examples include:

- Contributions to WFP and UNFPA operations inside Syria until 2019, which were both firmly grounded in the 3RP and the HRP for Syria
- The Fida project 2019-2021 on Improved Education and Psychosocial Wellbeing of Conflict-Affected Children in Syria, Daar'a governate, which forms part of Education cluster activities for the HRP co-led by UNOCHA and UNICEF
- Contributions every year to the International Committee of the Red Cross (ICRC) in the areas of health, WASH, livelihoods, food security etc, which have formed part of the ICRC appeal for Syria.

Programmatic co-ordination with national systems and structures: Outside Syria, Finnish-funded interventions were integrated in implementation with national systems and structures in education, at least. For example, the Fida education project was co-ordinated with Syrian Directorates of Education at governate level. The UNICEF No Lost Generation initiative, in which Finland has been a significant partner, though funded mainly with development co-operation money, contains significant humanitarian elements, and is implemented through the national education systems of host countries (Lebanon and Jordan).



Generally positive perceptions of relevance: All stakeholders interviewed considered that the Finnish priorities, including the focus on education, resilience, peacebuilding and supporting women and those with disabilities, were highly relevant for the different contexts of the regional crisis, whether inside Syria or in refugee-hosting contexts. Finland was considered to have a particular comparative advantage in raising gender and disability concerns, which have proven to be key vulnerabilities within the crisis (see section 3).

Finnish Embassy representatives were praised as one of the few which actually visit implementation sites inside Syria. However, interviewees also noted risks to relevance associated with MFA 'monitoring' visits to Finnish funded projects. In reality, these visits do not 'monitor' (in the results-based management sense of the term)⁵ projects. Rather, they provide Ministry personnel with an opportunity for insight into how specific interventions fully or partly funded by Finland are playing out on the ground, as well as a chance to gather intelligence on the specific context and situations of vulnerable populations. Where such missions are considered in this light, they can be both informative and useful to enhancing Finland's understanding of contextual conditions. The risk raised, however, was of MFA learning from one specific initiative being generalised to the wider context, when in fact the conditions of the crisis are highly localised.

Relevant policy dialogue priorities: Finland's main policy dialogue priorities in refugee-hosting countries, as reflected by interviewees, were linked to the three impact areas of the 2021-2024 Regional Strategy i.e. peace building; the enhancement of women's rights; and the rights of children and persons with disabilities. These are aligned to successive 3RP priorities, including disability as of 2022, though the Regional Strategy does not explicitly set out Finland's comparative advantages here.

All 18 partners interviewed considered Finland's policy dialogue priorities to be appropriate, with no areas of dissonance identified. The emphasis on disability was considered especially important in the crisis, given the physical and mental health challenges for those living with over ten years of conflict.

Finland is considered by partners to have a strong capacity and reputation for its gender work, linked to its long history of prioritising gender concerns in both its development and humanitarian assistance. Finland's advocacy on gender issues had actively introduced a 'gender lens' to e.g. UNICEF's education programming inside Syria. Finland's partners emphasised that Finland can play a significant role in leveraging other actors to engage here, given its strong reputational capital as a principled actor.

5.1.2 Alignment with the needs of the beneficiaries and stakeholders

Beneficiaries' in the Syrian regional context include national authorities and the wider population. Currently, EU directives (EU 2016) prevent direct financing of reconstruction within Syria itself (Sarpo 2019), given the wider political challenges of working with the Syrian national authorities.

^{5 &}quot;A continuing function that uses systematic collection of data on specified indicators to provide management and the main stakeholders of an ongoing development intervention with indications of the extent of progress and achievement of objectives and progress in the use of allocated funds" (OECD DAC 2004).



Both development and humanitarian needs at all levels in the crisis are acute, as described in section 3 above.

Mostly sound analytical base: A solid analytical basis is essential if Regional Strategies and Finland's humanitarian programming for the crisis are to be grounded in a sound knowledge of operating conditions.

While neither Regional Strategy contains a highly detailed contextual analysis, both do present the main dimensions the effects of the crisis. However, the most recent Strategy (2021-2024) does not – beyond a brief mention of political instability – discuss the political and economic crisis in Lebanon since 2019, despite being dated 2021, and particularly how this is anticipated to affect Finland's humanitarian and development assistance.

However, the Syrian regional crisis is extremely widely documented – not least to support the annual production of the Syrian HRP and the 3RP – and conflict and other analyses are widely available (REACH 2022b). Interviews with MFA staff indicated extensive contextual knowledge and awareness of the main sources available, and partners interviewed considered Finnish contextual knowledge to be well-informed, and - with the caveats above – usefully supported by field visits made. Finland also generated a Political Economy analysis for preparation of the Country Strategy, which considered the political sensitivity of working in Lebanon as well as the fragile context of the country since 2019. Nonetheless, Finland's perceived neutrality in its humanitarian assistance is however highly regarded by stakeholders.

Mostly (but not always) clear links from strategic direction to programming: The current Regional Strategy highlights Finland's groups of interest as being women and girls/ persons with disabilities. Within this, the Strategy points to Gender Based Violence and sexual and reproductive health rights as areas of concern. There is no further breakdown of groups intended to be targeted.

There is no major dissonance between the initiatives funded by Finland and these groups. All nine initiatives analysed highlight support to vulnerable groups and seven have an explicit gender component (only those from UNHCR and WFP lack information on this). However, UNHCR and WFP initiatives form part of the 3RP, and therefore do have a clear link to the 'most vulnerable' focus of the Strategy, and the gender emphasis – though only recently to disability.

On a few occasions, however, groups targeted by Finland's interventions in the crisis are not represented within the Regional Strategy. For example, the targeting Out of School Children by Fida is not represented within the Strategy, though the funding of the UNICEF No Lost Generation is very explicit within Goal 4 on the promotion of the rights and the inclusion of people belonging to the most vulnerable groups, including children and persons with disabilities.

Reliance on partners to conduct project/programme-level needs analysis: As a comparatively small agency, Finland places a high level of trust in partners to conduct their own analysis for the crisis. For multilateral agencies, there is no formal requirement or verification to ensure that these are developed or implemented. However, for civil society partnerships, analysis of the context is a core part of MFA application requirements.

Desk review reflected these requirements, with civil society organisation applications presenting detailed and extensive contextual analysis, often of particular areas or targeted groups. Multilateral agreements did not provide needs analysis, but, separately from their engagement with Finland,



these agencies presented evidence of extensive analysis conducted including: the humanitarian needs overviews supporting the 3RP; WFP's detailed food security and vulnerability analyses of affected populations both inside and outside Syria; UNICEF's comprehensive analysis of the education sector and gender issues; and UNHCR's detailed analysis of protection issues both inside Syria and within refugee hosting countries.

Similarly, at least three of the CSO interventions analysed presented comprehensive contextual needs analyses, including of the situations and vulnerabilities of beneficiaries. For example, the Fida education project for out of school children applied UNOCHA's needs assessment within the Syria country-based HRP for education, alongside Fida's own needs analysis. Requests for support to the ICRC contained a detailed breakdown of targeted groups, including IDPs, youth, Female Headed Households, persons with disabilities, those with illness/injured by the conflict, those with large families, and those with limited access to income. However, the request to support Save the Children's cash transfers initiative for Syrian refugees in Iraq (2016-2018) was not accompanied by a detailed needs analysis or even a gender breakdown.

Use of analysis to inform programmatic targeting: At individual project level, needs assessments – particularly for the four CSO initiatives and that of the ICRC - were clearly linked to intervention designs. For example, the ICRC presented a clear analysis of vulnerability categories; these same lists of targeted groups were reflected in the project design and later its evaluation.

Below the generalised level of 'women and girls', specific vulnerable groups targeted by Finnish interventions within the Syrian regional crisis included:

- Fida out of school children in three specific governates; IDPs and returnees;
- UNFPA victims of GBV; women lacking access to sexual and reproductive healthcare;
- ICRC IDPs, youth, Female Headed Households, persons with disabilities, those with illness or healthcare issues arising from the conflict;
- Save the children IDPs, returnees or refugees facing extreme economic deprivation;
- UNFPA girls, children, youth, gender and sexual minorities;
- UNICEF female and child victims of the conflict;
- UNHCR women and girls, the elderly, the disabled;
- WFP food insecure applying vulnerability categories.

However, NGOs and UN agencies tend to target different vulnerabilities according to their mandate (UN) or speciality (e.g. Save the Children International, children), rather than being directed more cohesively by the Regional Strategy. Thus, below the broader categories of "women and girls" and "persons with disabilities", Finland's targeting of vulnerabilities within the regional crisis did not appear directed by a clear strategic mandate.

Some (but not extensive) disaggregation of needs: There is no explicit requirement within the Regional Strategy for partners to report disaggregated data on vulnerability categories, and partners interviewed reinforced this, though noted Finland's concern for gender and disability issues.



However, project reports and evaluations of the four CSO projects reflected strong presence of disaggregation by women and girls/ those with disabilities. Moreover, wider reporting from e.g. UNHCR and WFP, does disaggregate by gender at least, and in the case of UNHCR by refugee/ IDP categories, though not yet for disability.

As funding declines, questions over continued relevance: With humanitarian financing volumes to the region declining over time, along with a reduced number of partners – just three in 2021 – the question opens up of whether Finland's reduced contributions will render it a less relevant partner for the crisis in future. This will depend on the direction of funding over time, but the case study notes that, as per section 4, much of Finland's assistance is directed to at least partially-humanitarian aims through development co-operation. Examples include its support to the UNICEF No Lost Generation initiative as well as the UNDP's Sub-Regional Response Facility which addresses the resilience part of the 3RP and targets vulnerable women and girls.

This is discussed under nexus concerns, below, but the wider point for this case study and the broader evaluation is that i) it is unfeasible to quantify fully the volume of Finland's humanitarian-focused assistance to the Syrian regional crisis given that the context requires that, by definition, much of the assistance is at least partly humanitarian in nature and ii) that the continued direction of Finnish funding to the crisis – whether humanitarian, development or a combination – will have a major bearing on its relevance in the period to come, particularly given the increasing scale of needs alongside the increasing complexity of the conflict.

5.1.3 Adaptation over time

A rapidly evolving context: Although protracted, the context for the regional crisis is highly dynamic. For example, the political and economic crisis in Lebanon since 2019 has affected the international response to the refugee situation, with Lebanon itself now in need of emergency assistance, hence the ERP for Lebanon. In Turkey, currency depreciation (section 3) has badly affected transfer values of the cash support on which most refugees depend. Inside Syria, the continued political complications in working with the Government of Syria particularly prevent external actors from engaging in reconstruction activities within the country. In such a dynamic environment, remaining consistently 'relevant' over time is a challenge for all international partners, including Finland.

Regional strategy sufficiently broad to encompass adaptation: Both Regional Strategies – as intended – provide a broad umbrella for Finnish assistance, including its humanitarian aid. Their breadth means that, since 2017 at least, there is little identified dissonance between the Strategies and the context of the crisis. The exception however is the deepening of the economic and political crisis in Lebanon since 2019 which, surprisingly, is not referenced in the new 2021-2024 Strategy.

Both Strategies have therefore provided a relevant enabling umbrella for Finnish funded assistance in broad terms - though their breadth of scope, when set next to the limited scale and partnerships of humanitarian assistance since 2020, mean that it would be challenging for Finnish assistance to fall outside them.



Operationally, Finnish-funded humanitarian initiatives mostly provide evidence of sound strategic and programmatic adaptation to conditions on the ground:

- Several adaptations in UNICEF and UN Women's programming were approved, including adaptations to reduce the impact of the COVID-19 pandemic, the economic and social crisis in Lebanon and the Beirut Post Blast.
- Within the Fida education initiative, when the partnership with Middle Eastern Council
 of Churches was interrupted in September 2019 due to objections by local authorities,
 the project had to adapt to work more comprehensively with local governates.

Aid management systems 'worked around': Finland's aid management systems for its humanitarian assistance have not actively supported adaptive capacity, given the high level of early commitments made on an annual basis. Operationally, however, according to stakeholders interviewed, Finnish dialogue with its partners has promoted adaptation as and when partners have articulated a need for this.

Finland does not have contingency funds in its humanitarian projects, nor a local fund managed by its Embassy. Most partners however praised Finland for its flexibility and openness to change.

5.2 How effective was the assistance?

5.2.1 Delivery of results for beneficiaries and other stakeholders

Initiative results aligned with the Regional Strategy but limited availability of results data. Review of the available four results frameworks for interventions (all CSO projects) found them aligned with the outcomes and outputs of Finland's two Regional Strategies for its humanitarian assistance. However, this appeared less deliberative than by default, due to the breadth of the Regional Strategy outcome areas. No interviewees among implementing partners had applied the Regional Strategy explicitly in setting or determining their own intended results, though some stated that they were informed by it.

There is little data available on tangible results reporting from Finnish-funded initiatives, mostly because of the channelling of the bulk of the funding through the 3RP; Finland does not require separate results reporting on these initiatives, but rather is content to apply the 3RP's own broader corporate reporting as a basis to consider performance.

However, individual agency reports also supplement results reporting on the crisis, such as UNICEF's Country Office Annual Reports (COARs), or WFP's Annual Country Reports, which are publicly available. By contrast, CSO projects tend to report upwards to their respective organisational HQ, where results are aggregated before reporting annually to MFA. Individual initiatives do, however, in their project completion reports, provide individual reporting on results, though usually at output rather than outcome level.



Results areas: The two Regional Strategies for the crisis had the following results areas relevant to humanitarian assistance (Table 7):

Table 7 Results from Regional Strategies

IMPACT AREA	OUTCOMES					
Syria and Iraq strategy 2017-2020:						
2. Securing a dignified life for affected populations in Syria and improved conditions for the safe return of refugees and IDPs in stabilised areas	2.1 Increased stability, self-reliance and resilience of communities in Syria, enabling refugees and IDPs to return 2.2 International aid to Syria better addresses the special needs of women					
A dignified life for Syrian refugees and host- community affected populations in Syria's neighbouring countries	3.1 Improved well-being and capacity of vulnerable refugee and host-community youth and women 3.2 Increasingly inclusive refugee and resilience response in Lebanon and Jordan					
4. Sustained stability and resilience of communities in Iraq with a view to enabling IDPs and refugees to return	4.1 Conditions are improved for the safe return of refugees and IDPs in stabilised areas					
Finland's strategy for development cooperation and humanitarian assistance in the Syrian crisis 2021–2024						
2. Rights of women and girls strengthened	2.1: Increased access to sexual and reproductive health services					
	2.2: Improved access to gender-based violence prevention and protection services;					
	2.3: Improved livelihood opportunities for women in Jordan).					
3: The rights of children and persons with disabilities, have been enhanced	3.1: Access to learning and personal development opportunities for children has improved; 3.2: The rights of persons with disabilities are enhanced					

The fact that humanitarian and development assistance are not held separately within the Strategy is reflective of the real conditions on the ground in the crisis where, as stated in section 3, conditions require a 'nexus' approach at many junctures. The 2021-2024 Strategy is explicit on this importance of the nexus and the links between these outcome areas and impact area 1 on Peacebuilding processes.

Initiatives have demonstrated some tangible achievements against these impact and outcome areas although – and particularly in the case of multilateral initiatives – the Finnish contribution cannot be quantified. Nonetheless, given that Finland is present in many of the key multi-donor forums for the crisis, as well as providing (even small) financing, some contribution at least can be attributed.

Example results reported, which could not be independently verified by the case study but are documented are listed in Table 8. For the most recent Regional Strategy (2021-2024) results are in



a very early stage of achievement given the recency of the strategy. However, progress is evident in both impact areas, and particularly in Impact area 2. Rights of women and girls strengthened.

Table 8 Achieved results against Regional Strategies

RESULTS AREA

ACHIEVEMENTS

Syrian Regional Strategy 2017-2020

Impact area 2. Securing a dignified life for affected populations in Syria and improved conditions for the safe return of refugees and IDPs in stabilised areas

Impact Area 3. A dignified life for Syrian refugees and hostcommunity affected populations in Syria's neighbouring countries Finland's assistance to both these impact areas has largely been delivered through its multilateral partners, although its financial contributions to both these areas are relatively small, given the scale of needs (see section 3).

UNHCR and the International Federation of the Red Cross and Red Crescent Society (IFRC)/ICRC in particular have both received large annual contributions every year since 2017; their work has provided the bulk of results here. For example, UNHCR 2017-2020 supported annually an average of 3.5 million Persons of Concern, both IDPs and refugees with basic needs support both inside and outside Syria (UNHCR 2017-2021). In 2020, it provided over \$246 million in cash assistance for 1.5 million Syrian refugees and winterization support for 761,089 people. 1.4 million Syrian refugees and IDPs reached with core relief items. 288,780 Syrian individuals received emergency shelter (UNHCR 2021b).

ICRC for the same years supported an average of over 0.5 million people with access to healthcare in 2020; 1.2 million people with essential items; and 1.3 million with hygiene kits (ICRC 2020).

WFP assistance has provided IDPs and refugees both within and outside Syria with food assistance and resilience activities. It received assistance from Finland until 2019. An independent evaluation in 2018 found that the WFP response met and exceeded the majority of its beneficiary targets for general food assistance, including basic needs, though it was not able to provide full entitlements across its caseload, and that it prevented declines among food security in beneficiary populations and reduced the use of coping strategies (WFP 2018).

Support to the ICRC resulted in rehabilitation of 26 Syrian Arab Red Crescent (SARC) health facilities and 255,940 people supported out of target of 450,000, with the variance against target due to population movement/contextual volatility.

Impact area 4. Sustained stability and resilience of communities in Iraq with a view to enabling IDPs and refugees to return Support to Save the Children in Iraq over-achieved against targets of improving children's conditions in terms of food, clothed, and violence/neglect/exploitation reduced (though some under-achievement on targets against case management and understanding protection risks, which were considered over-ambitious).



RESULTS AREA

ACHIEVEMENTS

Syrian Regional Strategy 2021-2024

Impact area 2. Rights of women and girls strengthened.

Finland's work to finance UNFPA supports the outcomes on Increased access to sexual and reproductive health services and improving access to gender-based violence prevention and protection services. In 2020, UNFPA reported that, as of August 2020, the organisation had:

- Reached over 1.6 million people inside Syria with Sexual and Reproductive Health (SRH) services
- · Provided 620,242 consultations on family planning
- · Provided 556,214 ante-natal care consultations
- Reached 650,835 people with GBV services
- Provided 349,071 Dignity Kits
- Provided 14,721 people with GBV case management

Other key results include:

- Reductions in maternal mortality in areas of coverage (UNFPA)
- Reductions in GBV prevalence and support systems for survivors established/legislative frameworks developed and implemented (UNFPA)

In 2020, UNHCR provided livelihoods services through a network of 123 community centres in Syria. 70% of those receiving support were women and girls (UNHCR 2021b).

Much of the work to improve livelihood opportunities for women in Jordan is financed through development co-operation, and specifically via support to UN Women. The work does have some strong humanitarian dimensions, however, particularly since it focuses on the rights of Syrian refugee women as well as other women in vulnerable situations to decent work and livelihoods. It is therefore not a pure humanitarian 'result' per se, but rather, as for the UNICEF No Lost Generation initiative, an example of nexus programming.

Impact Area 3: The rights of children and persons with disabilities, have been enhanced

The main gains for children financed through humanitarian initiatives arise from support to education e.g. through the No Lost Generation initiative. An independent evaluation of the No Lost Generation initiative in 2019 found that its influenced funding levels, especially earlier in the response and in relation to youth and adolescent programming later in the response. However, it never had the mechanisms to directly influence the scope or quality of programming and so its influence there was minimal (UNICEF 2019).

On disability, few tangible results are evident, reflecting more Finland's policy emphasis on disability as an issue, and encouragement to analyse and pay attention to the needs of persons with disabilities in project implementation, than funded initiatives. No discernible results were available.



5.2.2 What results were delivered for non-discrimination, including gender equality and the empowerment of women?

Finland is viewed by partners in the region as a donor with a strong empowerment-focused stance in policy dialogue on gender rather than adopting an 'equal number of women and girls' approach. This approach was praised by stakeholders (donors, UN, NGOs), as much for the consistency of the Finnish position as for its substantive content and strategic positioning.

Results generated were those for Impact Area 2 under the 2021-2024 Strategy. Reporting was notably variable, with UNFPA for example providing detailed gender-disaggregated data, and UNHCR providing only limited disaggregation in its reporting.

5.2.3 To what extent has Finland supported the promotion of localization of aid?

The case study found no active effort by Finland to promote the localisation of humanitarian aid. Those interviewed did not note that Finland raised the issue with them. However, with a decreasing number of partners, and trend towards the multilaterals, the issue is becoming important, particularly as local actors in the region have significant capacity levels.

5.2.4 Other factors in effectiveness

Four other aspects arose in the analysis of effectiveness:

- Limited aggregation to higher level change Over the period of the case study, contributions have been at different levels, ranging from contributions to large-scale interventions such as the 3RP to smaller scale Finnish NGO projects. Moreover, within the more recent results at least, results generated have mostly been individualised to specific projects.
 - While the Regional Strategy contains an indicative Theory of Change, results reporting has not yet been aggregated up to generate a cohesive set of aggregate-level contributions to higher level results, geared to Finland's overarching purpose of its assistance to the regional crisis. There is therefore a risk to some extent mitigated by the Regional Strategy's own internal Theory of Change that individual gains may be dispersed, and not build up to 'more than the sum of the parts' in terms of Finland's overall gains for its humanitarian (and development) assistance to the regional crisis.
- The 'nexus' Humanitarian assistance has not been explicitly utilised against Impact Area 1 of the current Regional Strategy, namely Building conditions and capacities for an inclusive, peaceful and democratic Syria. Nonetheless, given the 'nexus' approach of some of the funded initiatives, Finland's humanitarian assistance has, even indirectly, made some contributions here. Contributions to IFRC/ICRC for example have supported peacebuilding indirectly, and UNHCR has played a significant role in advocacy inside Syria, largely from the perspective of supporting its People of Concern (PoCs), but also in relation to opening up space for dialogue on the rights of displaced



- persons. This raises the issue of the 'needs based' principle of humanitarian assistance vs the 'rights based' approach of Finnish development assistance (see section 5.5).
- Visibility Finland is not considered an especially 'visible' partner in Lebanon, with most stakeholders describing it as 'discreet' or 'quiet'. In part this was attributed to possibly deliberate positioning by Finland, where a relatively low profile can help enable some of the political discussions in which it participates. However, the costs to this limited visibility meant that Finland was also not perceived as a particularly 'known' donor – and therefore, one whose voice and influence was prominent at multilateral discussions in particular.

5.3 How efficient was the assistance?

Is the management of humanitarian assistance flexible, adaptive and agile, able to react appropriately to emerging crises?

Finland is known as a 'willing' donor: All partners interviewed in the region considered Finland a highly willing and 'approachable' donor in terms of their openness to adapt assistance as conditions change. Remarks from partners were that Finland is considered a flexible donor when it comes to changing the modality of the intervention and implementation to fit newly emerging needs for the partners and target groups, such as shifting to an online modality due to the COVID-19 outbreak in affected countries (Lebanon, Syria and Jordan). Finland is also considered a flexible donor when partners need to reallocate between budget lines, taking account of the need to achieve project goals and objectives, and to ensure outreach to the hard-to-reach beneficiaries.

Examples of this willingness to adapt was reflected in adjustments made to UNICEF, ICRC and UN Women programming for the Lebanon country crisis. Similarly, changes to expenditure profiles were needed to adjust for COVID-19 conditions, with partners reporting willingness on the part of Finnish MFA representatives here.

The reputational capital generated by this flexibility is valuable, particularly when many partners deal with multiple donors, and are therefore in a position to compare. Partners considered that, although Finnish contributions were comparatively small in relation to humanitarian needs, this was to some extent 'outweighed' by their flexibility, which was not always available elsewhere.

Use of multilateral channels supporting efficiency: The channelling of the majority of the portfolio through UN systems has also supported efficiency. The UN manages the 3RP response for Syria and the region; it conducts most of the main analyses and has large-scale programmes in response to needs. Directing Finnish contributions through these channels provides Finland with the ability to support the large-scale international response to the crisis without incurring – particularly important given its limited human resources – major administrative burdens (also appreciated by partners).

The reduction in numbers of partners through the years is also an indicator of an effort to improve efficiency. In 2017, Finland funded nine partners with its humanitarian assistance, of which three were UN, one was the ICRC and five were CSOs. By 2021, that had reduced to just three



humanitarian partners, all of which are multilateral – namely UNFPA, UNHCR and the Red Cross movement – although 'nexus' interventions, such as the No Lost Generation initiative through UNICEF, support to women and girls through UN Women and support to resilience activities through UNDP, continued to be funded with development co-operation. The most recent CSO to be funded was FinnChurchAid in 2020.

Prioritisation of multilateral channels has served Finland's humanitarian assistance well from an efficiency perspective to date; however, if it continues into the medium term, arguably trade-offs will arise in terms of effectiveness. Finnish CSOs are valuable interlocutors in providing insight and information on conditions for beneficiaries on the ground, in a way that UN agencies cannot always offer. If Finland is not to fund CSOs working on the Syrian regional crisis directly through its humanitarian assistance, it will be important to sustain close links with CSOs funded through development assistance, due to the 'nexus' nature of many interventions in the region.

Some internal inefficiencies in aid management: Internally, the picture on efficiency is different. Interlocutors noted that the lack of 'joined up' and cohesive approaches between interlocutors in Helsinki – that is, between the Regional Department and the Humanitarian Unit – did not contribute to overall efficiency. While interlocutors who dealt solely with either division noted some limited delays or inefficiencies, those who had the occasion to deal with both units of the Ministry at once felt more explicitly that co-ordination was not consistent. At times they found themselves explaining information twice, or explaining the position of one unit to another. Interlocutors also noted that as a small administration, Finland has more scope than many for a more cohesive approach; they also observed that given the 'thin lines' between development and humanitarian assistance for the Syrian regional crisis particularly, the imperative for a joined-up approach – as reflected in the practical application of the assistance on the ground, was intensified.

Human resourcing challenges: One challenge arising to generating results was the limited human resources available to manage a complex humanitarian aid programme in a challenging and protracted emergency situation such as the Syrian regional crisis. MFA stakeholders both in Helsinki and Lebanon were highly aware of these constraints and their effects on the Embassy's ability particularly to support the effectiveness of Finnish-funded initiatives. Direct support through UN agencies was appreciated from the Embassy's perspective, due to the limited human resources available to 'follow up' on projects/programmes directly with local and international CSOs. |

Despite willingness, some procedural constraints in adaption of humanitarian assistance allocations: While praising Finland's 'willingness to adapt' interlocutors also noted some challenges in adapting agreements on humanitarian assistance when conditions changed. Although none met refusal, and all changes were eventually made, interlocutors noted that Helsinki-based decisions could take time, sometimes up to three weeks, particularly over the summer period, which from their perspective was relatively long. This was linked to the scant human resources of the MFA, above.

No contribution to Pooled Funds: Finland does not contribute to the UNOCHA-administered Country Based Pooled Funds (CBPFs) in the region, believing it can have greatest effect by prioritising its own thematic priorities such as gender and disability. CBPFs are however explicitly set up as instruments to facilitate smaller contributions to humanitarian crises, and to allow flexibility for allocation to areas of greatest need, with maximum efficiency.



While Finland's profile of current contributions permits greater emphasis on specific themes of interest, arguably they do not increase its visibility within the crisis, given that contributions to UNHCR and ICRC are a small part of a very large pool. Contributing to CBPFs would likely provide no gain in terms of visibility but would provide benefits in terms of the needs-base of the assistance and access to discussions around use of the CBPFs.

5.4 How coherent was the assistance?

5.4.1 External coherence: To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context?

Conducive context for external coherence: The Syrian regional crisis is a comparatively conducive context for coherence, after more than ten years of protracted crisis. Aid co-ordination structures and mechanisms are mature, with a clear and well-established strategic framework in the 3RP and formalised co-ordination mechanisms at all levels of the aid architecture.

Statement of intent on external coherence: The Regional Strategy is explicit on its intent to participate in the collective response to the crisis. 'Finland works as part of the European Union and with other partners, such as the UN.' The Strategy also lists, throughout its five impact areas, where Finland contributes to joint initiatives such as UNDP's Sub-Regional Response Facility for the Syria Crisis (SRF), responsible for the coordination of the resilience activities of the 3RP (development co-operation).

Variable participation in donor co-ordination forums: Evidence on co-ordination was mixed. Some UN and donor partners agreed that Finland participates actively in relevant forums, for example in relation to EU co-ordination on the crisis or in relation to education, in which Finland has a particular interest. However, other Embassies interviewed indicated limited knowledge of Finland's portfolio for the crisis, and felt that synergies were only partly explored and leveraged. Within sectoral working groups, for example - specifically education - and other donor platforms related to the Nordic countries, Finland is considered to 'keep a low profile' in such meetings, which MFA interlocutors considered key to adopting a 'neutral' persona. Finland does not appear to conduct direct bilateral meetings with the government of Lebanon, rather engaging through working groups.

MFA staff noted however that given the proliferation of co-ordination platforms on the crisis, and with limited human resources at the Embassy, it was unfeasible to participate in all relevant forums, with those where Finland was felt to have most comparative advantage prioritised.

Elsewhere, Finland's engagement was described by partners as 'useful but not essential'. The particular features of Finnish engagement appreciated were its emphasis on gender and disability; but Finland was also perceived to be relatively 'quiet' in some multi-donor forums, contributing little and present mainly to hear and gather information.

Engagement in multi-stakeholder programming: Being directed largely through the 3RP, Finland's humanitarian assistance by definition contributes to the main multi-stakeholder response to



the crisis. However, the 3RP itself has been described as a 'wish list' or 'shopping list' of initiatives from the UN, governments and CSOs, forming mainly an umbrella for a wide range of initiatives rather than a coherent strategic framework (Culbertson, S. *et al.* 2016).

Beyond the 3RP, Finland makes only limited contributions to multi-stakeholder initiatives beyond the 3RP. At operational level, however, due to the plethora of co-ordination platforms in the region, few initiatives operate alone. Support to ICRC, for example, is passed on through the local partners of the Syrian Arab Red Crescent (SARC), which acts as a co-ordination platform for 29 partners including NGOs and UN agencies. In Iraq, Save the Children's Finnish-funded cash transfer initiative is part of the Non-Governmental Organization Coordination Committee for Iraq , which includes UN Agencies, international and local NGOs, and the local government.

Aside from its humanitarian assistance, Finland's development assistance contributes to explicitly multi-donor initiatives such as the No Lost Generation initiative, and UNDP's Sub Regional Facility for resilience. These channels also provide Finland with insight into 'nexus' issues and opportunities for liaison and dialogue with partners.

5.4.2 Internal coherence: To what extentwas Finland's humanitarian assistance well-coordinated internally?

Limited internal coherence across assistance types: The case study found limited coherence over time across the different types and modalities of Finnish assistance provided to the regional crisis. Both desk analysis of projects and interviews found few synergies between, and even limited mutual awareness of, Finnish-financed interventions, particularly given the recent decline in the number of partners. Interviewees were not aware of where other Finnish contributions were being allocated.

Moreover, for the most part, humanitarian and development interventions— despite the operationally flexible use of funding streams— are institutionally separately, being discretely funded, managed and implemented by the Department for the Middle East and the Humanitarian Unit respectively. For example, the UNICEF No Lost Generation initiative sits with the Regional Department, and Finland's contributions are overseen by them. By contrast, the Humanitarian Unit engages with UNFPA on its sexual and reproductive health/gender based violence activities. Interlocutors in Helsinki agreed that engagement tends to happen at the time of consultations on the allocation of the annual Humanitarian Unit budget, rather than on an ongoing basis throughout the year.

Fragmented internal knowledge: Interviews with MFA staff and with UN/CSO partners reinforced this finding: Few Lebanon- or Helsinki-based implementation partners had an awareness of the 'aggregate' level of Finnish assistance to the regional crisis, nor of individually Finnish-funded initiatives. MFA staff both at the Embassy in Lebanon and in Helsinki noted that they do not always have a clear overview of the diverse forms of assistance provided from the different streams – though they also noted that this was improving. At Embassy level, some decisions taken by Helsinki were not always communicated fully in advance.

Few attempts to 'join up' assistance Particularly with the declining number of partners in recent years, interventions are implemented discretely, with the Embassy lacking time and resources to connect interventions funded under separate modalities or by separate departments. No partners



interviewed had experienced efforts by MFA to join up assistance e.g. across CSOs funded in the past, though UN partners noted that most activities are joined up by default given the plethora of co-ordination platforms in place. Visits to partners/projects tended to be perceived as 'bilateral' – 'they came to see our work' (interview with implementing partner).

5.5 How connected was Finnish assistance to international commitments and to other forms of cooperation?

International recognition of the 'nexus' approach The protracted nature of the Syrian regional crisis arguably generated much of the international thinking around the 'nexus' approach. The 2016 Agenda for Humanity, which emerged from the World Humanitarian Summit (UN 2022), drew heavily on learning from the crisis around nexus concerns (UN 2016). The European Consensus for Development and Council Conclusions on Operationalising the Humanitarian-Development Nexus also provides a consolidated European position on the nexus (EC 2017).

Explicit focus on the nexus in the Regional Strategy: The Regional Strategy 2021-2024 makes a clear statement of intent on connectedness by joining up its humanitarian and development assistance. Its first sentence is 'This strategy covers the Finnish response to the developmental, peace building and humanitarian needs of the conflict in Syria and in the neighbouring countries of Lebanon and Jordan.' The document goes on to explain that '... the promotion of a humanitarian-development-peace nexus to the crisis response is critical. Short-term humanitarian assistance and longer-term stabilization/development support need to be coordinated and integrated in an effective and holistic manner, to ensure that the response contributes to the resilience of communities and societies that are hosting Syrian refugees'. This statement is accompanied by Strategic Goal 3 on 'The promotion of resilience building and strengthening the humanitarian development-peace nexus.'

A conducive context for nexus approaches: Several conducive conditions therefore combine to support Finland's use of the 'nexus' approach in the Syrian regional crisis. These include: i) a clear international recognition of, and push for, nexus approaches; ii) Finland's own clear strategic intent at nexus approaches, as reflected in its current Regional Strategy for the crisis; and iii) a surrounding context that actively indicates the use of nexus modalities in a highly protracted crisis.

Implementation of 'nexus' approaches in practice Finland's flexibility in its actual application of both humanitarian and development assistance on the ground, recognising that real situations often require a combination of both, reflect the use of 'nexus' approaches in practice. Several Finnish initiatives funded through development assistance – such as support to UNICEF in the No Lost Generation' initiative and the work of UN Women on supporting Syrian refugees and vulnerable Jordanian women in Jordan – combine both humanitarian and development elements. Similarly, from the pure humanitarian perspective, Finland supports WFP which, while a pure humanitarian agency, also conducts resilience activities both within and outside Syria.

On a practical level, interlocutors in the region could only rarely distinguish between Finland's humanitarian and development co-operation. For them, the assistance was understood as 'Finnish assistance' and little more. The limited burdens Finland wishes to place on its partners supported



this lack of distinction, given that neither modality requires intensive reporting. Stakeholders reported that only very 'thin lines' exist between humanitarian and development co-operation, both strategically and practically, even though in most donor agencies – including Finland – humanitarian and development assistance are institutionally separate.

Its flexible use of funding streams therefore offers Finland scope to ensure that the nexus approach can be implemented where feasible within the Syrian regional context, in a situation where traditional 'humanitarian' and 'development' separation is neither strategically appropriate nor operationally desirable.

'Needs based' and 'rights based': The flexible use of developmental and humanitarian funding however does raise the question of the different 'rules' governing the assistance. Within the regional crisis, these 'rules' are clear, after ten years of conflict and a wider policy context of non-engagement with the Syrian authorities. Humanitarian assistance only can be used inside Syria, and should be needs-based, while development assistance – certainly according to the Finnish Development Policy – should be fundamentally rights-based in nature.

Yet the practical application of these rules in a protracted crisis is highly complex operationally, particularly where 'needs' and 'rights' may be conflated, as for example in an education for emergencies programme, or a resilience programme which offers immediate livelihood support to those who cannot feed themselves. The boundaries between needs and rights may become blurred, and difficult to separate.

This case study has not encountered any inappropriate blurring of boundaries in Finnish assistance between the two approaches. Finnish humanitarian assistance is directed on a need's basis, e.g. to UNHCR, WFP and ICRC, and its development assistance is applied to support e.g. UNICEF and UN Women. However, it is within programmatic approaches used by these agencies that needs and rights may become conflated – UNHCR, for example, adopts a strongly rights-based approach in its protection work, while much of UNICEF's emergency work, as in the regional crisis, serves needs as well as rights.

For Finland, therefore, under its current institutional separation, the critical aspect is a clear understanding of what the 'rules' governing each type of assistance are, and whether needs or rights should be the primary focus of each assistance type. While at Embassy level, and particularly with the post of a Development Specialist now established, this distinction was clear, it was not clear from interviews with stakeholders in Helsinki that the differences were known and recognised – in part, since staffing for both the Regional Desks and the Humanitarian Unit is comprised largely of career diplomats.



6 Conclusions

The Syrian regional case study presents an interesting case for the use of Finnish humanitarian assistance. After ten years of crisis, and deepening needs and complexities, the crisis offers opportunities for external actors such as Finland to try new approaches and ways of working.

Finnish humanitarian assistance has proven both relevant to the needs of those targeted, as well as aligned with the main strategic frameworks for the response, which are by now mature. Its special emphasis on the needs of women and girls and the disabled are reflected in its strategic priorities and, for the former, in its funded interventions. As yet, the emphasis on the disabled is more in terms of policy dialogue than on tangibly funded initiatives. The greatest threat to relevance comes from Finland's declining volumes of funding to the crisis, with only three partners funded in 2021.

Finland's humanitarian assistance has contributed to some tangible results on the ground, although its contributions to the large-scale response frameworks for the crisis are small and, notably, declining. Finland is not perceived as a particularly 'visible' donor in the crisis and if assistance continues its current trajectory, is likely to become less influential over time. Nonetheless, partners appreciate Finland's flexibility, openness and its consistent emphasis on gender equality within the crisis.

In a context where the lines between humanitarian and development interventions are thin, Finland's humanitarian assistance has been appropriately deployed for 'needs based' approaches, while its development assistance, even where there are humanitarian dimensions, remains focused on rights. In practical terms, however, organisations utilising Finnish development and humanitarian assistance respectively may extend its application from needs into rights, and vice-versa. This is not necessarily problematic as long as Finland is clear on the respective uses of its assistance and is comfortable with its application. Here, there may still be work to do on the clarification of boundaries.

Finally, the low visibility of Finland as an actor within the regional crisis may have its strategic and political advantages. From a purely humanitarian perspective, however, it does effectively reduce Finland's potential for influence, particularly with the large-scale multilateral agencies which Finland is now solely funding though its humanitarian assistance. If Finland is to make best use of its capacities within the crisis, some further refinement of its humanitarian profile may be useful. The following section provides some areas for future consideration.



7 Issues for consideration

In successive rounds of support to the crisis, Finland may wish to consider the following issues:

- In its next strategic framework for the regional crisis, after 2024, delineate more explicitly how Finland's humanitarian and development financing will be used. This does not reflect a need to reduce flexibility, but rather to emphasise including to internal MFA staff the particular distinctions and 'rules' that govern each stream.
- Consider engaging in CBPFs for the crisis, since these provide a useful channel for smaller contributions, as well as an important channel for efficiency and effectiveness, being targeted to greatest need.
- Reconsider a more strategic model of CSO support in the region, by ensuring a collective approach between the Humanitarian Unit, Regional Department and CSO Unit of MFA, to ensure that assistance is fully aligned, in consultation with the Embassy.
- Adopt a cohesive approach between the Humanitarian Unit and the Regional Department on the crisis, to actively consider, as part of planning and implementation, how both humanitarian and development assistance can be applied in a complementary way to support nexus approaches for such a protracted crisis.
- Act as a demonstrator regarding the use of nexus approaches in the region, illustrating how Finnish financing – both humanitarian and development – is being used to support these. Almost all donors experience the same institutional separation of humanitarian and development funding streams, yet Finland – in part due to its comparatively small size – has found a way to navigate the division in the Syrian regional context of extended crisis.



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COUNTRY CASE STUDY ANNEX - BANGLADESH

RAISA VENÄLÄINEN FOYZUL BARI HIMEL



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Acronyms and abbreviations

BDRCS Bangladesh Red Crescent Society

CSO Civil Society Organisation

DCA Danish Church Aid

ERU Emergency Response Unit

EUR Euro

FCA FinnChurchAid

FDMN Forcibly Displaced Myanmar Nationals

FRC Finnish Red Cross
GBV Gender-Based Violence
HRP Humanitarian Response Plan

ICRC International Committee of the Red Cross

IFRC International Federation of Red Cross and Red Crescent Societies

ISCG Inter-Sector Coordination Group

JRP Joint Response Plan

MFA Ministry for Foreign Affairs of Finland RCEH Red Cross Emergency Hospital

UN United Nations

UNDP United Nations Development Programme

UNFPA United Nations Population Fund

UNHCR United Nations High Commissioner for Refugees

UNICEF United Nations Children's Fund

UNOCHA United Nations Office for the Coordination of Humanitarian Affairs

USD US Dollar

WASH Water, Sanitation and Hygiene
WFP World Food Programme



1 Introduction

This case study comprises one of three prepared for the Ministry of Foreign Affairs (MFA) Finland's Evaluation of Humanitarian Assistance, 2016-2022. The other two case studies are of MFA's assistance to South Sudan and Syria.

The purpose of each Case Study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation, while adapting their analysis for the specifics of the country context.

The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation
- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it;
- To generate Lessons/Implications to help inform MFA stakeholders in their humanitarian assistance programming, as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

The Case Study is explicitly not a full evaluation of Finland's humanitarian assistance to the Rohingya Refugee⁶ Crisis in Bangladesh, which would be beyond its remit. Accordingly, it does not provide Recommendations, but rather proposes some Lessons/Implications to support internal dialogue and learning.

⁶ The term "Rohingya Refugee" is used by the United Nations (UN) system working in Bangladesh. However, the Government of Bangladesh refers to the Rohingya population in Bangladesh as "Forcibly Displaced Myanmar Nationals (FDMNs)". In this document, both terms have been used.



2 Methodology

The approach and methodology for the wider evaluation is fully described in Annex 2 of the main evaluation report. This Case Study has applied the overarching evaluation questions, design and methodology of the wider evaluation, with adaptation for the contextual specifics of the Rohingya Refugee crisis. The questions to which it contributes evidence are as follows.

EVALUATION CRITERIA	EVALUATION QUESTIONS			
How <u>relevant</u> was Finnish humanitarian assistance to needs?	 To what extent was Finland's humanitarian assistance relevant to the needs of beneficiaries, considering available resources? To what extent was the assistance relevant to the needs of key stakeholders, including government, civil society and others? To what extent did the assistance adapt appropriately over time, including in relation to changing humanitarian needs? 			
How <u>effective</u> was Finnish humanitarian assistance 2016-March 2022?	 What results for beneficiaries and other stakeholders were delivered by Finland's humanitarian assistance? What results were delivered for non-discrimination, including gender equality and the empowerment of women and persons with disabilities? To what extent has Finland supported the promotion of localization of aid? To what extent has Finland been able to influence and promote Finland's Humanitarian Policy priorities in the multilateral organisations or Finnish Civil Society Organisations (CSOs) that are used to channel the humanitarian assistance? 			
How <u>efficient</u> was Finnish humanitarian assistance?	Is the management of humanitarian assistance flexible, adaptive and agile, and able to react appropriately to emerging crises?			
How <u>coherent</u> was Finnish humanitarian assistance?	 External To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context? Internal To what extent does the current choice of funding channels contribute to the effectiveness of humanitarian aid, i.e. is Finland working with right partners, considering its Humanitarian Policy? To what extent has it been possible to establish synergies between different MFA cooperation modalities, i.e., international and national level partnerships of CSOs, International Non-Governmental Organisations (INGOs) cooperation when transitioning from humanitarian aid to development cooperation or peacebuilding and vice-versa? Are the various aid and cooperation modalities within MFA sufficiently coordinated to avoid duplication? 			
How connected was Finnish assistance to international commitments and to other forms of cooperation?	 To what extent did Finland's humanitarian assistance adhere to international commitments on the International Humanitarian Principles and Do No Harm? To what extent did Finland's humanitarian assistance establish links between humanitarian aid and development cooperation and/or peacebuilding efforts (the 'nexus')? 			



The theoretical framework for the evaluation combines theory-based evaluation (Chen 1990), with elements of contribution analysis (Mayne 2001) and a utilisation-focused approach (Patton 2008). It functions at aggregate level for the strategic evaluation and is applied to this case study through the structured tools applied (see Annex 2 of the evaluation report). This case study contributes to its specification, validation and interrogation as part of the wider evaluation.

The case study has adopted a structured and systematic approach, in accordance with the methodology for the wider evaluation. The main elements of the methodology applied are as follows:

- Quantitative analysis of Finnish assistance to the Syrian regional crisis for the period 2016-2022, generated from MFA statistics;
- Interviews with key Helsinki- and regionally-based stakeholders working currently on the regional crisis within MFA;
- Interviews with key partners in the region who either receive Finnish humanitarian assistance currently or have worked with it in the past;
- Systematic analysis of nine MFA-funded projects implemented in the region during the evaluation's time period of 2016-current against a structured analytical framework (see Annex 5 in Volume 1 of the report).

Interviews in the region were conducted by a Country Evaluator over the period March-April 2022, in collaboration with an international evaluation team member.

Limitations

Limitations of the case study are as follows:

- As a case study rather than a full evaluation, this report does not provide a definitive performance assessment of all Finnish humanitarian (or other) assistance to Bangladesh with regards to Rohingya Refugees during the period 2016-current. Rather, it offers limited insights, generated through a systematic approach, to inform the wider evaluative process.
- The case study does not include visits to individual projects or interviews/focus groups with direct beneficiaries. Interviews were conducted remotely.



3 Humanitarian context

Bangladesh is a country in Southern Asia, bordered by India on all sides except for a small border with Myanmar. With population exceedingly around 166.5 million in an area of 147,570 square kilometres of land area (BBS 2021), Bangladesh is one of the most densely populated countries in the world. Bangladesh has the world's 41st largest economy (BIDA 2022) and one of the fastest growing economies in the world. By 2018, Bangladesh fulfilled all three eligibility criteria for graduation from the UN's Least Developed Countries (LDC) list for the first time and is on track for graduation in 2024 (World Bank 2019). This achievement has been accompanied by an increase in per capita income, increased national household income and expenditure as well as access to clean water, sanitation, electricity and household assets. According to the Human Development Index (HDI), Bangladesh stands at 133 out of 189 countries (UNDP 2020).

Over the last four decades, in 1978, between 1991 and 1992, and in other short waves prior to August 2017 Rohingya refugees have been fleeing in successive waves to Bangladesh from Rakhine State, Myanmar. The largest influx of Rohingya refugees into Bangladesh began on August 25th, 2017, and since then, nearly a million Rohingya refugees have fled to Cox's Bazar District, Bangladesh.

According to the latest UNHCR Bangladesh operational update (as of April 2022) around 926,000 of Rohingya Refugees/ Forcibly Displaced Myanmar Nationals (FDMN) are living in Cox's Bazar district in around 33 camps (UNHCR 2022b). The demography of this population is as follows:

Table 1 Demography of Cox's Bazar population

DEMOGRAPHIC FEATURES	NUMBER
Adult Population	45%
Children	51%
Older Persons	4%
Persons with Disability	1%
Male	48%
Female	52%

Source: UNHCR 2021b, March 2022

The Rohingya refugee population is highly reliant on humanitarian assistance. Structural factors continue to challenge, including a lack of formal education in camps, insufficient health, water, sanitation and hygiene (WASH) provisions, and weak shelter infrastructure. In addition, the refugee camps in Cox's Bazar are especially vulnerable to natural disasters. The outbreak of the COVID-19 in March 2020 severely restricted service delivery to the highly aid-dependent refugee



communities. The rapid speed and enormous scale of the refugee influx have also placed a significant strain on resources, infrastructure, public services and the local economy in what is already one of the most socially deprived areas of Bangladesh. A return of refugees to Myanmar in the near or medium term continues to be unlikely (UNHCR 2021a).

A Joint Response Plan (JRP) was introduced in October 2017 to systematically coordinate the resources and efforts of all relevant government ministries, divisions and directorates, multilateral development agencies and national and international NGOs, under the leadership of the Government of Bangladesh. Since then, the JRPs have been the preliminary vehicle for synchronisation and coordination of humanitarian responses of government, donors and development agencies, focused under five different strategic areas: Sustainable repatriation of FDMN/Rohingya population, Protection of FDMN/Rohingya population, Delivery of Life-saving Assistance to the FDMN/Rohingya population, Well-being of Host Communities, and Strengthen disaster risk management and combat the effects of climate change.

Since 2017 till the end of 2021, more than USD 3 billion have been raised through different response plans/appeals under the umbrella of JRP (Prior to 2017, the response plans were known as Humanitarian Response Plans or HRPs). In addition, more than USD 600 million was raised outside the plans/JRP, making the total funding for refugee response in Bangladesh to around USD 3.67 billion in the period of 2017 till 2021 (UNOCHA 2022). Funding has constantly experienced shortfalls. As of May 2022, only 9.4 % of funding has been raised for the year 2022. The following Figure 1 illustrates the trends in reported funding during period 2012 – 2022 against JRPs and HRPs.

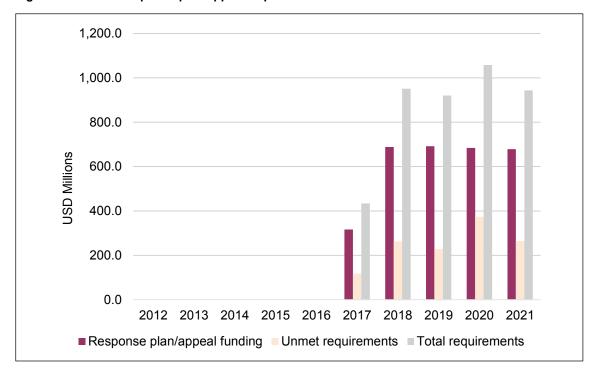


Figure 1 Trends in response plan/appeal requirements 2012-current

Source: UNOCHA 2022



The Rohingya humanitarian response is led and coordinated by the Government of Bangladesh. For the humanitarian actors, the Strategic Executive Group (SEG), which is co-chaired by UN Resident Coordinator, Chief of Mission of the International Organisation for Migration (IOM) and Representative from UNHCR, provides overall guidance for the Rohingya humanitarian response and engages with the Government of Bangladesh at the national level, including through liaison with relevant line Ministries. At the field level in Cox's Bazar, the Principal Coordinator of the Inter-Sector Coordination Group (ISCG)⁷ Secretariat ensures the overall coordination of the response. The ISCG convenes the Sector/Working Group (WG) Coordinators' Group to ensure inter-sector coordination in the response.

⁷ The ISCG is the central coordination body for humanitarian agencies serving Rohingya refugees in Cox's Bazar, Bangladesh. These agencies are organised into 12 thematic Sectors and Sub-Sectors (e.g. Protection, Health, WASH) as well as Working Groups that focus on cross-cutting issues (e.g. Protection, Gender in Humanitarian Action, Communicating with Communities). ISCG includes representation from the multilateral development agencies and Non-Governmental Organisations (NGOs) working in different sectors, sub-sectors and cross-cutting issues.



4 Evolution of Finland's humanitarian assistance since 2016

Finland supports the humanitarian questions related to Rohingya refugees in Bangladesh from its humanitarian aid budget.

4.1 Overall funding trends

Total Finnish Humanitarian Assistance to Bangladesh from 2017 till 2020 was EUR 4.58 million, as shown in Table 2 below. The larger portion of the assistance was disbursed in 2018 and 2019. The total assistance disbursed to Bangladesh, in this period was only 1.30% of the total Finnish humanitarian assistance. There was no assistance provided to Bangladesh in 2016 and 2021. Considering the entire period of 2016 to 2021, the proportion of assistance to Bangladesh in comparison to the total Finnish humanitarian assistance would be 0.83%. There are no allocations for 2022.

Table 2 Finnish Humanitarian Assistance in Bangladesh and in the rest of the world

YEAR	ASSISTANCE IN BANGLADESH (EURO)	ALL FINNISH HUMANITARIAN ASSISTANCE	PROPORTION OF ASSISTANCE TO BANGLADESH TO TOTAL FINNISH HUMANITARIAN ASSISTANCE
2017	381,800	81,274,904	0.47%
2018	2,200,000	73,507,417	2.99%
2019	1,500,000	80,739,364	1.86%
2020	500,000	116,605,887	0.43%
Total	4,581,800	352,127,572	1.30%

Source: MFA Statistics 2022

Almost half of the total humanitarian assistance to Bangladesh was disbursed in the health sector. This means that around 17.2% of all Finnish humanitarian assistance spent on health went to Bangladesh. The sector-wise disbursement trend is shown in Table 3 below.



Table 3 Sector-wide Allocation of Finnish Assistance in Bangladesh and in Rest of the World

	HEALTH	MULTI- SECTOR	PROTECTION - AID TO DIS- PLACED	PROTECTION - OTHER
Bangladesh	2,181,800	400,000	1,000,000	1,000,000
Total Finnish Assistance	12,681,800	449,820,379	54,071,327	35,350,000
Proportion of Assistance to Bangladesh to Total Finnish Humanitarian Assistance	17.20%	0.09%	1.85%	2.83%

Source MFA Statistics 2022

4.2 Finnish Funding in relation to Humanitarian Needs

The Finnish contribution to the Rohingya refugee situation in Bangladesh has been small. According to UNOCHA data, the total requirement of humanitarian assistance to address the crisis in Bangladesh was more than USD 4.3 million during the 2017 to 2021 period (UNOCHA 2022). The JRP and other relevant response plans and appeals could generate around 71% of this requirement, with 29% unmet for the period 2017-21. Finnish Humanitarian Assistance comprised 0.11% of the total requirement and 0.16% of the total Response plan/appeal funding against JRPs/HRPs, as shown in Table 4 below.

Table 4 Total Humanitarian Assistance Required in Bangladesh, Unmet Requirements and Finnish Assistance

YEAR	TOTAL REQUIREMENTS AGAINST JRP/HRPS (USD MILLION)	FINNISH ASSISTANCE IN BANGLADESH (USD MILLION) ⁸	% OF FINNISH AS- SISTANCE TO TOTAL REQUIREMENTS AGAINST JRPS/HRPS
2017	434.07	0.40	0.09%
2018	950.83	2.31	0.24%
2019	919.53	1.58	0.17%
2020	1,058.09	0.53	0.05%
2021	943.12	-	-
Total	4,305.64	4.82	0.11%

Source: UNOCHA 2022, MFA Statistic 2022

⁸ Converted from Euro to USD, considering 1 Euro = 1.05 USD



4.3 Recipients of Finnish Assistance

Finland's humanitarian aid to Bangladesh is channelled through three organisations, namely, Finnish Red Cross (FRC), under the coordination umbrella of International Federation of Red Cross and Red Crescent (IFRC), FinnChurchAid (FCA) and UNHCR for the period of 2016-21. Almost 48% of the total humanitarian assistance of Finnish Government was received by the Red Cross Movement, more specifically, FRC under the umbrella of IFRC. FCA received 30% and UNHCR received 22% of the allocation during the period of 2016-21 as shown in Figure 2 and Table 5.

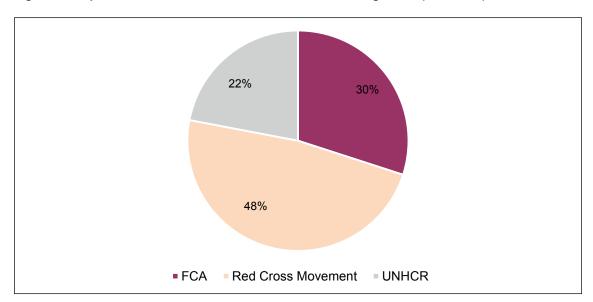


Figure 2 Recipients of Finnish Humanitarian Assistance in Bangladesh (2016-2021)

Source: MFA Statistics 2022

Table 5 Allocation per organisation 2017 - 2020

ORGANISATION	YEARS	THEME	TOTAL EUR
Finnish Red Cross (IFRC)	2017 - 2018	Health (field hospital)	2,181,800
FinnChurchAid (FCA)	2018 - 2020	Sexual and Reproductive Health and Rights (SRHR), education, protection	1,400,000
UNHCR	2019	Protection, aid to refugees, returnees, Internally Displaced Persons (IDPs)	1,000,000
Total			4,581,800

Source: MFA Statistics

Sector-wide recipients and amount of fund received for 2016-21 period are shown in the Table 6 below. As mentioned before, there was no Finnish Humanitarian Assistance allocated to Bangladesh in 2021, or for 2022 (as of May 2022).



Table 6 Sectors supported in Bangladesh (2017-2020, in EUR million)

RECIPIENTS	HEALTH	MULTI- SECTOR	PROTECTION - AID TO DIS- PLACED	PROTEC- TION - OTHER	GRAND TOTAL
FinnChurchAid		0.40		1.00	1.40
Red Cross movement	2.18				2.18
UNHCR			1.00		1.00
Grand Total	2.18	0.40	1.00	1.00	4.58

Source: MFA Statistics

4.4 Description of the interventions

4.4.1.1 Red Cross Emergency Hospital (RCEH)

Following the crisis in 2017, Bangladesh Red Crescent Society (BDRCS) scaled up its operations. BDRCS requested for a Red Cross Emergency Hospital (RCEH), which was deployed by the Norwegian Red Cross (NorCross) with the support of the FRC. The hospital was placed next to Camp 7, Kutupalong.

The MFA granted EUR 381,000 for the RCEH as part of the Population Movement Operation of the IFRC. FRC requested EUR 600,000 for the Emergency Response Unit (ERU) as part of IFRC operation, but due to the tight financial situation, the MFA allocated a grant of EUR 381,800. Additional funding of EUR 1.8 million was disbursed the following year.

Towards the end of 2017, NorCross stated their inability to retain the lead of the hospital, beyond the initial 4-month commitment. No other actor (BDRCS, other Partner National Societies, IFRC) wanted or could take the lead of the RCEH. It was then agreed that FRC would take over from mid-February and until the end of 2018. In December 2017 (13.12.2017) MFA approved a no-cost extension till 30.4.2019 to ensure transferring the ERU to BDRCS. In January 2019, the RCEH was handed over to the BDRCS. Later, the ERU was converted into field hospital/emergency hospital, which was maintained through the efforts of the expatriate healthcare experts with the skills that the local society (BDRCS) could not mobilise.

4.4.1.2 Protection and Education for Adolescent Rohingya girls and women in Cox's Bazar

FCA received funding for the implementation of the project 'Protection and Education for Adolescent Rohingya girls and Women in COX's Bazar' in 2018, 2019 and 2020, to a total of EUR 1.4 million. FCA had operated in Rakhine on the Myanmar side, but there was no access to actors other than the International Committee of the Red Cross (ICRC) and WFP, and therefore FCA planned to support the Rohingya refugees on the Bangladesh side. The project was implemented



in collaboration with the Danish Church Aid (DCA), which is registered in Bangladesh. FCA seconded an Education in Emergencies expert to DCA.

The project aimed to ensure that Rohingya refugee women and girls can enjoy quality and safe educational services. The FCA and the DCA developed an approach where women and girls are offered a range of activities related to the prevention and education of gender-based violence, including individual social services and guidance, psychosocial support, literacy and numeracy education, and life skills and basic education. The activities are organised both in female-friendly facilities and as home training. Home schooling has become a recognised form of education in refugee communities because it takes into account the need for protection and security risks of Rohingya women and children.

4.4.1.3 UNHCR

MFA disbursed EUR 1 million in funding to UNHCR Rohingya Response in Bangladesh on June 2019 as part of the EUR 9 million disbursement, divided between Afghanistan (EUR 1 million), Syria (EUR 1 million), Yemen (EUR 2 million), Democratic Republic in Congo (EUR 1,5 million), Regional Nigeria (EUR 1 million) and Syria situation (EUR 1,5 million). This funding was merged into the USD 173 million pot from 29 countries and 10 NGOs.

Since the first day of the recent influx in August, 2017, UNHCR has been providing support to the Rohingya population fleeing to Bangladesh and has been working as a key player in emergency response interventions. Major sectoral priorities of protection include continuing ensuring protection and basic needs for the FDMN/Rohingya refugees, ensuring specialised services for persons with special needs through community-based approach, supporting system strengthening to mitigate potential tensions between FDMN and host communities, and ensuring protection services for adolescents and children through the prevention and mitigation of Gender-Based Violence (GBV) and the protection of GBV survivors.

As per its annual reports, UNHCR spent around USD 559 million between 2017 and 2020 to address the humanitarian crisis against a budget of USD 914.4 million for Bangladesh, as shown in Table 7 below. Expenditures are made from the contributions of different country governments, development agencies and private donors.

Table 7 Budget estimate and expenditure of UNHCR in addressing FDMN/Rohingya Crisis in Bangladesh

YEAR	BUDGET ESTIMATE (USD MILLION)	EXPENDITURE (USD MILLION)
2017	67.6	49.6
2018	220.4	159.9
2019	307.6	175.7
2020	318.8	173.8
2021	295.1	data not available yet

Source: UNHCR 2022a



5 Key findings

- 5.1 How relevant was Finnish humanitarian assistance 2016-March 2022?
- 5.1.1 To what extent was Finland's humanitarian assistance aligned with relevant policies and strategies in the context?

Strong alignment with key strategic priorities in the context Finland's support is aligned with the HRP and JRP strategic objectives. The RCEH through its emergency services contributed directly to the strategic objective of the HRP 2017 of 'ensuring provision of life-saving basic assistance in settlements, camps and host communities'. During 2017-2018 most education support was channelled to general education. However, the Joint Education Needs Assessment (JENA) by the Cox's Bazar Education Sector group (2018), pointed out that the age group of those 15 – 24 years had remained as a key gap unaddressed by partners. Thus, the JRP 2019 included a specific objective of 'strengthening immediate access to equitable learning opportunities, in a safe and protective environment, for crisis-affected refugee and host community children and youth (3-24 years)', towards which the FCA/DCA project contributed.

Filling humanitarian assistance gaps Nonetheless, all interviewees considered that the Finnish assistance was relevant and that it addressed the gaps of the service provision both in health, education and protection sectors in Cox's Bazar. Finnish humanitarian assistance also addressed the most vulnerable women and girls, and efforts were made to facilitate access and participation for instance of persons with disabilities, although with limited success.

Integrated approaches were applied. The FCA/DCA project provided protection and psycho-social support to the GBV survivors and linked basic literacy, numeracy and life skills in its programme. This is in line with the Cox's Bazar Gender-Based Violence Sub-Sector Strategy (2018), which notes that a significant proportion of the population lacks access to information and life-saving support if they experience GBV. The strategy also urges more community-based outreach and programming and implementation of innovative, integrated approaches.

Limited awareness of the Finnish Humanitarian Policy From the implementer's side, the Red Cross humanitarian policy was considered to be a greater priority than the MFA's Humanitarian Policy (MFA 2019). The partnership of FRC with IFRC and BDRCS was also guided more by the Red Cross policy rather than MFA policy. With regards to FCA, some orientation on FCA policies was given to DCA and the Education in Emergencies (EiE) expert for instance emphasising the inclusion of persons with disabilities. However, the interlocutors considered that the knowledge of the staff deployed by FCA and in the DCA office about Finland's Humanitarian Policy remained thin.



5.1.2 Alignment with the needs of the beneficiaries and stakeholders

Interventions responded to the needs of beneficiaries. The beneficiaries of Finnish supported interventions in Bangladesh are the Rohingya population of Cox's Bazar. Half of the Rohingya refugees are women and girls, many of them are single heads of households, and unaccompanied or separated children. With regards to education, the Multi-Sector Needs Assessment (UNHCR 2018) reports that 97% of adolescents and youth aged 15-24 years were not attending any type of education facility, the majority of them female. The Assessment further states that socio-cultural beliefs and practices, along with protection concerns have impacted their participation.

The RCEH was the first and only emergency care facility in the camps Its services were needed because Rohingya refugees crossing to Cox's Bazar were arriving with many health needs including: treatment for physical injuries, gunshot wounds and burns, prevention and treatment of communicable diseases, antenatal care, emergency obstetric care services, reproductive health, and GBV case management including clinical management of rape'(ISCG 2017). Although the amount to UNHCR in 2019 was not significant in comparison to the agency's resource requirements overall the funding formed part of the wider contribution to the life-saving needs of affected communities. The Finnish contribution of EUR 1 million was fed into material relief assistance and services (50%) and Relief coordination and support services (50%) (UNHCR 2020).

Contextual analysis was not conducted as part of the design of the assistance. Thus, no analyses was prepared of the socio-cultural, political and economic context of the country in general and Cox's Bazaar in particular – which subsequently had implications for implementation. For instance, it was reported that the original plan for the FCA/DCA support included components for promoting livelihood of women. This was narrowed down as a result of the needs assessment by the Education in Emergencies (EiE) expert, because it was considered too ambitious and not relevant in the context. The interviewees also considered that the FRC support was planned in a hurry, without properly analysing the local context. Overall, the governance, coordination and power structure of the development community working in Cox's Bazar (with more than 18 UN agencies, and over 200 international and national NGOs) was not analysed well. Both FRC and stakeholders in Bangladesh concur that FRC did not analyse the local context well, because they did not have enough time and resource to do a thorough analysis.

Overall, the case study finds that the interventions supported by MFA, filled a gap in the humanitarian response. The RCEH provided life-saving emergency services which were not provided by anyone else in the locality at the outset of the project. DCA/FCA was the only organisation offering education to those between 15-24 years old in the two targeted camps (Camp 21 and 15), where it provided safe educational opportunities for adolescent women.

5.1.3 Adaptation over time

Transition of the field hospital but with challenges Until October 2018, the RCEH was the only service provider to deliver 24/7 emergency services requiring surgical interventions (i.e., blood transfusion and emergency obstetric care services). In November 2018, the IFRC and BDRCS decided to shift from emergency response mode to health service provision for both FDMN/Rohingya



refugees and host communities. Since December 2018, the Red Cross Emergency Hospital has been in the hands of the BDRCS, and is now known as the BDRCS Emergency Hospital.

The local Red Cross Society (BDRCS) was not ready to take over. Key stakeholders interviewed indicated that FRC had withdrawn its support without proper planning. Also, the BDRCS faced challenges in mobilizing experts. The final evaluation of the initiative (Hamre *et al.* 2019) also concluded that a thorough risk analysis of the consequences of this change for the population, the other health actors in the camp 7 and the BDRCS would have been needed. It remains unclear to what extent the refugees currently have access to the Government hospitals for instance for major surgery and whether they will be able to operate there in their own language.

The relevance of the hospital has increased over time. The External Evaluation of the Finnish Red Cross-led Emergency Hospital Operation (Hamre *et al.* 2019), confirmed by stakeholder interviews for this case study, suggest that while the emergency needs (e.g., surgery and infectious diseases) were dominant when the hospital was set up in October 2017, the needs addressed are now more targeted to everyday life in the camp. The numbers of patients served has also increased over time (see section 5.2 below for detailed analysis).

5.2 How effective was the assistance?

5.2.1 Delivery of results for beneficiaries and other stakeholders

Monitoring and evaluation have not been used as a management tool for guiding the implementation. Although both FCA and FRC as well as Unit for Humanitarian Assistance and Policy (KEO-70) have conducted monitoring visits to Cox's Bazar, there is no evidence on how these visits have guided the implementation or helped address challenges. The Embassy of Finland in India, which covers also Bangladesh, has made few field missions to Bangladesh but these missions have not explicitly addressed humanitarian interventions. The MFA holds annual discussions with UNHCR where for instance Rohingya issues have been discussed. In these meetings MFA has emphasised the gender and disability inclusion issues but such discussion has not taken place at country level.

Similarly, the extension of the projects was not based on evaluation or monitoring data. Both projects implemented by FCA and FRC were extended to a new phase. However, the extensions were not explicitly justified by evaluation or monitoring findings. Although an evaluation of the 'Lessons learned of its piloted joint Education in Emergencies/Gender-based violence programme' was commissioned by FCA in 2019 to analyse and evaluate the interconnectedness of the two major components of the initiative, Education in Emergencies (EiE) and Gender-based violence of the DCA/FCA programme (Borhan 2019), it is unclear how the results of this evaluation were used to guide the further work. After the RCEH handover, FRC requested an evaluation of the initiative, with the FRC, the RC/RC Movement and the MFA as the main audience. The evaluation was intended to assess the relevance of the operation considering the shifting needs of the population. However, as indicated above, this evaluation did not address the effects of the initiative changed focus on beneficiaries.



The FRC and FCA projects have both achieved and exceeded their output targets. Literacy, numeracy and life skills activities benefitted 560 women and girls (target 160), and overall, 16,623 beneficiaries were reached through GBV activities (FCA 2019). The objectives of scaling up of the protection and education services have also been achieved. The Education Sector Coordinators reported that material on functional numeracy, basic literacy and life skills developed in the project has been endorsed and validated by the Education Sector Working Group and is now used by the DCA in 15 interventions in the camps and host communities, supported through UN Women. The following Table 8 highlights the results as reported by FCA final report 2019.

Table 8 Results of Humanitarian interventions supported by Finland

STRATEGIC OBJECTIVE	OUTPUTS
Health	
Strategic Objective 1 (HRP 2017) Provide life-saving basic assistance in settlements, camps and host communities. An estimated 919,000 refugees were estimated in Cox's Bazar as of August 2018 (ISCG 2019).	 The results of the RCEH between October 16, 2017 and December 31, 2018 are summarised below (FCA 20) # Of out-patient visits (disaggregated by sex/age/diagnosis) 50 810 Of out-patient visits were registered out of whom 45% were female. 8 388 patients (17%; F 42%, M 58%) were children under 5 years old. # Of hospital admissions (disaggregated by sex/age/diagnosis) 174 patients (F 52%, M 48%) were admitted to the hospital. Hospitalisations consisted of surgical (25%), paediatrics (24%) and newborns (12%), gynaecological/obstetrical (5%), internal medicine incl. infectious diseases (15%) and maternity (15%) cases; 3% N/A. # Of deliveries, obstetric and surgical operations In total 640 deliveries were managed in the RCEH; 71% were complicated deliveries. In total, 2'852 surgeries and surgical procedures were performed out of which 325 (11,4%) caesarean sections, 32% minor surgical procedures, 30% wounds and 11% orthopaedic cases.
Protection	
Protection objective 4 (HRP 2017) Enhanced access and improved quality (timely, safe, age appropriate, disability and gender-sensitive) response and prevention services for survivors of GBV	 16,623 beneficiaries were reached through GBV activities (FCA 2019) Results reported by UNHCR as of 31 December, 2019 (UNHCR 2019) 819,787 of distinct refugees registered on an individual basis whose data has been updated 13,512 of PoC receiving legal assistance 78 of community groups supported (Community self-management) 2040 of refugees with disabilities receiving specific support 1,314 of unaccompanied and separated refugee children identified and documented 113 of children's committees, groups and other structures that are operational and facilitate children's participation of community-based committees/ groups working on GBV prevention and response 4280# of reported GBV incidents for which survivors receive psychosocial



STRATEGIC OBJECTIVE	OUTPUTS
Education	
Expand and strengthen immediate access to equitable learning opportunities, in a safe and protective environment, for crisis-affected refugee and host community children and youth (3-24 years). (JRP 2019)	The FCA project reached overall 21,901 women and girls. The literacy, numeracy and life skills intervention benefitted 560 women and girls (target 160), skills development 88 women and girls; parenting and early childhood pilots benefited 201 children and 135 caregivers (FCA 2011).

Sources: FCA 2019, UNHCR 2019

Limited integration into national systems The evaluation of the FRC operation (Hamre *et al.* 2019) reported that the Host National Society (BDRCS) was only to a limited degree involved in the management of the hospital, thus potentially affecting the continuation of the hospital services from January 2019. Although building capacities of national societies is always part of FRC operations, this did not take place in a systematic manner. Some training was provided to local society (BDRCS) staff members, but it was not targeted to the hospital management level. Consequently, the intention of reducing the number of international staff in the FRC-supported hospital and increasing the number of national staff proved very challenging in practice, due to the limited availability of qualified national resources wanting to work at the hospital, often far away from their families and in tented facilities.

After the withdrawal of FRC in 2018, the hospital now serves as a Primary Health Care unit and it is reported by BDRCS that by 2022, the hospital has served the following number of patients. All targets were achieved, with results considerably in excess of targets set as shown below:

- 370,035 people reached with services to reduce relevant health risk factors against a target of 200,000;
- 581 BDRCS staff and volunteers that have been trained against a target of 50;
- 245,152 people reached with psychosocial support in camp and host communities against a target of 200,000;
- 991 volunteers trained in psychosocial first aid against target of 550.



The total number of patients served so far is presented in Table 9 below.

Table 9 Number of patients of the Field Hospital/Emergency Hospital 2018 - 2021

YEAR	TOTAL NO OF SERVICE RECIPIENTS	NO OF OUTPATIENTS	NO OF INPATIENTS
2018	19,115	16,194	2,921
2019	55,585	53,666	1,919
2020	38,198	37,909	289
2021	60,666	60,244	422
Total	173564	168,013	5,551

Source: Data provided by email by BDRCS, April 2022

5.2.2 What results were delivered for non-discrimination, including gender equality and the empowerment of women?

All interventions addressed particularly women. The DCA/FCA project explicitly targeted women aged 15 - 24 as its primary beneficiary group. RCEH services were also particularly responsive to the needs of women and girls through their focus on C-section deliveries, sexual and reproductive healthcare, and the provision of psychological counselling and mental health support to help address the trauma that these women and girls faced due to violence and injuries caused by GBV.

Facilities at RCEH for patients and their families, and staff were planned and upgraded to preserve women and children's' safety (with e.g., separate sleeping quarters and WASH facilities for males and females/children), and to meet the needs for female hygiene. The Education Sector Working Group Coordinators consulted, pointed out the strong gender focus of the FCA project as follows: 'The uniqueness of this programming [FCA/DCA] is that, all the Right Holders are young and adolescent females from Rohingya and Host Communities and all the staff in the FCA/DCA education team are also female.'

Disability inclusion was sought but with limited results. Interviewees reported that efforts were made to identify and engage persons and particularly women with disabilities, but that such persons were hard to locate, and often remained invisible in their communities. The indicator framework for the intervention lacked specific disaggregated indicators from disability inclusion, and no reporting is available to this effect. The premises were accessible for persons with disabilities, including also a toilet for persons using a wheelchair. The hospital cooperated with Humanitarian Accountability Partnership International who provided consultations for rehabilitation.



5.2.3 To what extent has Finland supported the promotion of localization of aid?

Localisation of humanitarian action in Bangladesh has been an important focus in recent years. There have been several initiatives, including Bangladesh being selected as the first 'demonstrator country' for the Grand Bargain Localisation Workstream Field Mission in September 2018 (IFRC 2019).

Limited understanding on localisation, although some degree of application. The FCA/DCA project design refers to localisation as 'taking into consideration the local context and adapting the operations to meet the needs of the beneficiaries' (FCA 2011) rather than its intended approach of devolving humanitarian assistance to the management of local partners (UN 2016). On the ground, however, the approach is applied in practice, for instance by engaging and capacitating local actors, mainly women (FCA), working through the relevant National Society BDRCS (FRC) and supporting community-based actions (UNHCR).

However, as indicated earlier in this report (section 5.1.3), the FRC's agenda of working through the National Society was not fully successful, particularly in the transition process, largely since i) the process was not well planned and ii) the capacities of the National Society were not enhanced in time to take over the hospital management and operations.

5.2.4 Other factors in effectiveness

Visibility Finland is not 'visible' as an aid actor in Bangladesh. UNHCR in the country, for example, was not at all aware of the Finnish contribution received. Finland does not have an Embassy in Bangladesh and the country is covered by the Embassy of Finland in India. Therefore, Finland is not present in the aid coordination structures in Bangladesh.

Human resourcing. Since Finnish humanitarian aid to the Rohingya refugee crisis falls under the Embassy of Finland in India, the burdens of follow-up also fall to the Embassy. Given highly stretched human resources, and reportedly high staff turn-over, there was limited prioritisation of the Rohingya situation.

5.3 How efficient was the assistance?

Is the management of humanitarian assistance flexible, adaptive and agile, able to react appropriately to emerging crises?

Finland is considered a flexible funding agency. FCA and FRC interviewed concurred that MFA is a flexible and responsive funding agency and that the MFA responded positively and in a timely manner to requests for e.g., a no-cost extension (such as that granted to FRC). Disbursements were made in a relatively short period of time, though delays in operationalisation were reported due to slow procedures on formalities in Bangladesh. MFA requested clarifications to justify the extension.



Operating through multiple layers of partner organisations increased administrative costs.

Working through DCA enabled FCA to access Rohingya refugees in Bangladesh, because DCA was already registered in Bangladesh and it had financial structures in place receiving finance in the country. However, this has not been without financial cost. Analysis of the 2018-2019 budget of the FCA project in Bangladesh (total EUR 400,000) reveals that the additional implementation layers have effectively doubled the administrative / overhead costs, as Table 10 illustrates below. The FCA overhead (7%) plus DCA running costs (8%) consumed 15% of the total budget, in addition to the costs (financed by Finland) of expatriate staff and an area manager.

Table 10 Break-down of 2018 - 2019 budget of FCA project

ITEM	EUR	%
Staffing	236,622	56
Operational costs/ activities	107,436	26
DCA Running maintenance administration	32,433	8
FCA overhead 7%	28,000	7
M&E	10,503	3
Procurement	5,069	1
Total	420,063	100

Source: FCA 2019

Inefficiencies identified in project handover As per section 5.1.3 above, the handing over of the hospital to BDRCS had some efficiency gaps, with limited planning, and enhancement of the institutional capacity of the national society to manage such a hospital. As a result, some services were discontinued, such as surgical interventions and Caesarean section deliveries, with refugees consequently having to use Government services, where these are available – despite access challenges. It was also evident that due to the lack of longer-term strategic planning, workload and limited human resources, FRC could not establish a strategic relationship with BDRCS, and could not focus on training the BDRCS's staff (see Hamre *et al.* 2019).

On the other hand, the FCA project was closely integrated into DCA operations. DCA has strong ownership and has continued using the materials developed through the Finnish-funded intervention.

Relatively high operating costs but no cheaper alternatives Overall, the funding for the hospital was adequate for its operation and management, as indicated by both key respondents and the final evaluation report. The latter however, considered the hospital to be "expensive" given the presence of a large number of expatriate deployments see (Hamre *et al.* 2019). Supplies also had to be sourced from outside Cox's Bazar, and even from outside the country, as those were not available locally. The evaluation concludes however, that there was no cheaper alternative to deliver the similar level of effectiveness.



5.4 How coherent was the assistance?

5.4.1 External coherence: To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context?

Finnish recipient organisations had only limited engagement with broader aid coordination structures. The Finnish expert seconded to DCA participated in the Youth Sector group and in the Education Cluster and promoted actively adolescent education. FCA communicated through DCA and because of BDRCS's auxiliary role to the Government, the BDRCS was able to communicate directly with the Government.

Limited opportunities to influence UNHCR which is the lead within the Protection sector. Advocacy work is practically done only at the level of bilateral negotiations with UNHCR by the MFA Head Quarters. This is the platform where Finland has promoted for instance disability inclusion. Finland is also supporting development interventions in Bangladesh which could share lessons learned, for instance on child protection, but

5.4.2 Internal coherence: To what extentwas Finland's humanitarian assistance well-coordinated internally?

Finland's humanitarian assistance is a set of projects rather than designed as a portfolio model While Finland's humanitarian assistance to Bangladesh is aligned with its partners' operations and portfolio, there is no coordination of information exchange between Finnish supported interventions, although the projects addressed similar themes of GBV and psycho-social support. Some limited internal coherence between the interventions did occur, but it was opportunistic rather than strategic. For instance, within the DCA portfolio an agreement was made with a UNICEF-supported psycho-social support project on geographical areas to be addressed, so as to avoid duplication. The internal coherence between FRC and the national society in Bangladesh was unclear.

5.5 How connected was Finnish assistance to international commitments and to other forms of cooperation?

Humanitarian principles are applied. The institutional policies of the agencies implementing Finland's humanitarian assistance in Bangladesh (FCA, FRC and UNHCR) are based on the international humanitarian principles and the humanitarian ethos and policy of "Do No Harm". The assistance aligns with the key international frameworks for humanitarian assistance as follows.

• FRC works under the IFRC Fundamental Principles which are in line with the international humanitarian principles. The operations of the Red Cross and Red Crescent Movement are steered by seven fundamental principles: humanity, impartiality, neutrality, independence, voluntary service, universality and unity (FCA 2012).



- FCA is a rights-based actor. Its work is guided by international human rights standards and principles (FCA 2017). FCA is also committed to the standards of the Inter-agency Education in Emergencies Network (INEE 2012), which aim at ensuring quality, coordinated humanitarian response: meeting the educational rights and needs of people affected by disaster through processes that assert their dignity. FCA and its host organisation in Bangladesh, DCA, emphasise the integration of Do No Harm and conflict sensitivity into all work to avoid any negative impacts and maximise positive effects.
- UNHCR, as an UN entity, adheres to the principles of humanity, impartiality, neutrality
 and independence, that have been taken up by the United Nations in General Assembly Resolutions 46/182 and 58/114. UNHCR is guided by humanitarian principles in its
 response to all humanitarian crises. It also applies an explicitly rights-based approach,
 being grounded in the 1951 Refugee Convention (FCA 2017).

Finnish humanitarian assistance is also rights-based. The FCA programmatic approach for example adopts a strongly rights-based approach in its education work, and part of its work particularly related to protection, serves needs as well as rights. Its work in Bangladesh combines both humanitarian and development elements. UNHCR, as above, responds to humanitarian needs, but is an essentially rights-based organisation.

Finland's humanitarian assistance has not made specific contributions to 'the nexus' The case study has not identified links between Finland's humanitarian assistance and development/ peacebuilding actions. Scope for such linkages exists, however: FCA in particular has opportunities to address triple nexus, with its concurrent development and humanitarian work in Bangladesh geared around three thematic priority areas of the Right to Education (R2E), Right to Livelihoods (R2L) and Right to Peace (R2L). The FCA project 'Protection and Education for Adolescent Rohingya girls and Women in Cox's Bazar' combines the 'needs based' principle of humanitarian assistance and the 'rights based' approach more usually applicable to development assistance. Clarity here on the differences between the two, and their application on the ground, would be useful.



6 Conclusions

Finnish humanitarian assistance to Bangladesh is relevant to the needs of those targeted, and it is aligned with the main strategic frameworks for the Rohingya response as well as the Finnish Humanitarian policy. There is a clear focus on women and girls, but the issue of disability inclusion is not yet fully operationalised.

Individual interventions have produced tangible results. Although the assistance is small (just over EUR 4 million), it has made a significant contribution to humanitarian needs in Cox' Bazar not only to individual's lives but also to actions beyond the project implementation period. cycle. The interventions focus on the same sectors and could have benefitted from greater synergy and cooperation.

One of the success factors for the achievements has been the flexibility of MFA, which has enabled organisations to respond to needs quickly and as they arise. The fact that Finland does not have a direct presence in Bangladesh has limited its capacity to monitor and oversee the implementation of the Finnish support, and to understand more deeply the humanitarian conditions in the context. The interventions are implemented also as discrete initiatives, rather than as a more coherent humanitarian portfolio.

There are some inefficiencies in the management of the Finnish support. Although the choice of joining efforts up with other organisations in the context has been operationally appropriate, as in FCA and DCA, it has also increased administrative costs to a relatively high degree for a small initiative. If projects are implemented by and through partner organisations, there is a need for deeper analysis of planned expenditure, and the respective complementarity of interventions.

Because Finland has remained relatively invisible in Bangladesh, it also has not had an opportunity to influence the policies and advocate on the priorities it promotes in humanitarian work. This has constrained its influence, and kept it at a distance from the wider humanitarian landscape.



7 Issues for consideration

Going forward, if Finland continues to provide financing to the Rohingya crisis in Bangladesh, Finland may wish to consider the following issues:

- Enhance coherence and collaboration between MFA-supported interventions in the country through stronger communication and information-sharing regarding Finnish-funded interventions. This could enhance the impact and visibility of Finland's work.
- More actively consider how both humanitarian and development assistance can be applied in a complementary way to support nexus approaches, for example by explicitly adopting needs-based and rights-based approaches to assistance types;
- Actively seek a pathway for defining and promoting Finland's humanitarian priorities in the context, rather than purely a responsive approach to partner needs.
- Generate alternative mechanisms to monitor and oversee the humanitarian interventions in countries where MFA does not have a presence, such as through annual visits by the Embassy in India.



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COUNTRY CASE STUDY ANNEX -**SOUTH SUDAN**

ERIK TOFT ARIIC DAVID



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Acronyms and abbreviations

CBPF Country Based Pooled Fund CSO Civil Society Organisation

DG ECHO European Commission Directorate-General for European Civil Protection and Humanitarian Aid

Opera-tions

EUR Euro

FAO Food and Agriculture Organisation of the United Nations

FCA FinnChurchAid

FTS Financial Tracking Services
HRP Humanitarian Response Plan

ICRC International Committee of the Red Cross

IDP Internally Displaced Person

IOM International Organisation for Migration
IPC Integrated Food Security Phase Classification

MFA Ministry for Foreign Affairs of Finland
NGO Non-Governmental Organisation

PBF Peacebuilding Fund

SGBV Sexual- and Gender Based-Violence

UN United Nations

UNDP United Nations Development Programme

UNHCR United Nations High Commissioner for Refugees

UNICEF United Nations Children's Fund

UNMISS United Nations Mission to South Sudan

UNOCHA United Nations Office for the Coordination of Humanitarian Affairs

USD US Dollar

WASH Water, Sanitation and Hygiene
WFP World Food Programme



1 Introduction

This case study comprises one of three prepared for the Ministry of Foreign Affairs (MFA) Finland's Evaluation of Humanitarian Assistance, 2016-2022. The other two case studies are of MFA's assistance to Bangladesh and the Syria crisis.

The purpose of each Case Study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation, while adapting their analysis for the specifics of the country context.

The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation;
- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it;
- To generate Lessons/Implications to help inform MFA stakeholders in their humanitarian assistance programming, as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

The Case Study is explicitly not a full evaluation of Finland's humanitarian assistance to South Sudan, which would be beyond its remit. Accordingly, it does not provide Recommendations, but rather proposes some Lessons/Implications to support internal dialogue and learning.



2 Methodology

The approach and methodology for the wider evaluation is fully described in Annex 2 of the main evaluation report. This Case Study has applied the overarching evaluation questions, design and methodology of the wider evaluation, with adaptation for the contextual specifics of South Sudan. The questions to which it contributes evidence are as follows.

EVALUATION CRITERIA	EVALUATION QUESTIONS
How <u>relevant</u> was Finnish humanitarian assistance to needs?	To what extent was Finland's humanitarian assistance relevant to the needs of beneficiaries, considering available resources? To what extent was the assistance relevant to the needs of key stakeholders, including government, civil society and others? To what extent did the assistance adapt appropriately over time, including in relation to changing humanitarian needs?
How effective was Finnish humanitarian assistance 2016-March 2022?	What results for beneficiaries and other stakeholders were delivered by Finland's humanitarian assistance? What results were delivered for non-discrimination, including gender equality and the empowerment of women and persons with disabilities? To what extent has Finland supported the promotion of localization of aid? To what extent has Finland been able to influence and promote Finland's Humanitarian Policy priorities in the multilateral organisations or Finnish Civil Society Organisations (CSOs) that are used to channel the humanitarian assistance?
How efficient was Finnish humanitarian assistance?	Is the management of humanitarian assistance flexible, adaptive and agile, and able to react appropriately to emerging crises?
How <u>coherent</u> was Finnish humanitarian assistance?	External To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context? Internal To what extent does the current choice of funding channels contribute to the effectiveness of humanitarian aid, i.e. is Finland working with right partners, considering its Humanitarian Policy? To what extent has it been possible to establish synergies between different MFA cooperation modalities, i.e. international and national level partnerships of CSOs, International Non-Governmental Organisation (INGO) cooperation when transitioning from humanitarian aid to development cooperation or peacebuilding and vice-versa? Are the various aid and cooperation modalities within MFA sufficiently coordinated to avoid duplication?
How connected was Finnish assistance to international commitments and to other forms of cooperation?	To what extent did Finland's humanitarian assistance adhere to international commitments on the International Humanitarian Principles and Do No Harm? To what extent did Finland's humanitarian assistance establish links between humanitarian aid and development cooperation and/or peacebuilding efforts (the 'nexus')?



The theoretical framework for the evaluation combines theory-based evaluation (Chen 1990), with elements of contribution analysis (Mayne 2001) and a utilisation-focused approach (Patton 2008). It functions at aggregate level for the strategic evaluation and is applied to this case study through the structured tools applied (see Annex 2 of the evaluation report). This case study contributes to its specification, validation and interrogation as part of the wider evaluation.

The case study has adopted a structured and systematic approach, in accordance with the methodology for the wider evaluation. The main elements of the methodology applied are as follows:

- Quantitative analysis of Finnish assistance to South Sudan for the period 2016-2021, generated from MFA statistics;
- Interviews with key Helsinki- and South Sudan-based stakeholders working currently on South Sudan within MFA;
- Interviews with partners in South Sudan who either receive Finnish humanitarian assistance currently or have worked with it in the past;
- Systematic analysis of five MFA-funded projects implemented in the region during the evaluation's time period of 2016-current against a structured analytical framework (see Annex 5 in Volume 1 of the report).

Interviews in the region were conducted by a Country Evaluator over the period March-April 2022, in collaboration with an international evaluation team member.

Limitations

Limitations of the case study are as follows:

- As a case study rather than a full evaluation, this report does not provide a definitive performance assessment of all Finnish humanitarian (or other) assistance to the regional crisis during the period 2016-current. Rather, it offers limited insights, generated through a systematic approach, to inform the wider evaluative process.
- As part of a strategic exercise, and given that Finnish humanitarian assistance is case study is allocated to partners in the region, the case study does not include visits to individual projects or interviews/focus groups with direct beneficiaries.
- The evaluation team was unable to identify MFA staff with knowledge of the project portfolio or with detailed knowledge of South Sudan.

To allow the international team member to participate in interviews, all interviews were conducted remotely.



3 South Sudan humanitarian context

3.1 Background

South Sudan is located in East Africa, covering an area of 645,000 km² with a population of around 12 million (see Figure 1).

UNITED NATIONS SUDAN SOUTH S-U-DA-N NORTHERN Aweil BAHR-FI-GHAZAL WARRAP Fatha WESTERN Bisellia Bir Di OPI JONGLEI BAHR-EL-GHAZAL CENTRA LAKES AFRICAN REPUBLIC WESTERN Terakeka **EQUATORIA** CENTRAL O Juba **EQUATORIA** DEMOCRATIC REPUBLIC OF THE CONGO UGANDA

Figure 1 Map of South Sudan

Source: https://www.un.org/geospatial/content/south-sudan-1

South Sudan gained independence from Sudan in 2011 after two decades-long (civil) wars with Sudan. In late 2013 civil war broke out in South Sudan between the president and his former deputy from the Dinka and Nuer communities, respectively. After the outbreak of the civil war, the number of displaced and food insecurity people increased dramatically due to the conflict compounded by natural disasters such as drought and/or flooding.



The first peace agreement, in 2015, did not result in a sustainable peace, and violence escalated again in 2016, the start of the period covered by this evaluation. A new peace agreement, the revitalised peace agreement was signed in 2018, also without any notable impact on displacement or food insecurity. People remain too scary to return home/to leave the protection sides next to the bases of the peace-keeping forces' (United Nations Mission to South Sudan – UNMISS) bases. On March 15, 2022, the UN Security Council extended UNMISS's mandate for one year with the same level of troops (17,000 soldiers and 2,100 police personnel) (UN 2022a).

No data on Gender Inequality Indicator is available for South Sudan. South Sudan has the highest maternal mortality rate, standing at 1,150 (World Bank 2019), and has a low GINI index of 44 according to the latest data (World Bank 2017).

3.2 Humanitarian needs

By March 2022, it is estimated that almost 9 million people are in need of humanitarian assistance, of which over 8 million people are food insecure, and over 4 million people are displaced, half of which have fled to neighbouring countries. Details also of previous years are included in Table 1 below.

Table 1 People in need, Internally Displaced Persons (IDPs), refugees and food insecure people (millions)

YEAR	PEOPLE IN NEED	IDPS	SOUTH SUDANESE REFUGEES ⁹	FOOD INSECURE
2016	6.10	1.60	0.65	4.30
2017	7.50	1.90	1.30	6.00
2018	7.00	1.90	2.10	6.10
2019	7.10	2.00	2.20	6.87
2020	7.50	1.50	2.20	6.48
2021	8.30	1.60	2.20	7.24
2022	8.90	2.00	2.30	8.30

Sources: UNOCHA Humanitarian response plans 2016-2022, UNOCHA 2020a, and IPC Classifications 2016-2020

Depicting the data in the above table as per Figure 2, it is clear that there has been a steady increase in the number of people in need (red column) from 6 million in 2016 to now almost 9 million. Likewise, the number of food insecure people have increased from 4.3 million people in 2016 to now over 8 million (green column). The changes in the number of displaced people does not show the same clear upward trend (orange column) except after the second round of conflict in 2016.

⁹ Living in neighbouring countries



MIlion people ■ People in need Food insecure people Total displaced

Figure 2 Development in humanitarian needs (2016-2022)

Sources: UNOCHA Humanitarian response plans 2016-2022 and IPC Classification 2016-2020

In addition to food insecurity and displacement, hundreds of thousands of people have died due to the conflict, with a report from 2018 counting almost 400,000 excess deaths between 2013 and 2018 (Checchi, F et al. 2018). South Sudan is also hosting 300,000 refugees from neighbouring countries (UNOCHA 2022).

3.3 Humanitarian response

The UN and partners' annual Humanitarian Response Plan (HRP) funding request for alleviation of the humanitarian suffering has been between USD 1.3 and USD 1.9 billion, of which donors have funded around USD 1.2 billion (or between 64% and 92% of the requested amount) every year (see Table 2).

Table 2 Humanitarian funding to South Sudan

YEAR	HRP REQUEST (USD BILLION)	FUNDED (USD BILLION)	% FUNDED
2016	1,291	1,188	92.0
2017	1,640	1,165	71.0
2018	1,708	1,207	70.7
2019	1,507	1,138	75.5
2020	1,900	1,220	64.2
2021	1,678	1,143	68.1

Source: UNOCHA Financial Tracking Services (FTS)



4 Evolution of Finland's humanitarian assistance to South Sudan since 2016

Finland does not have a Country Strategy for South Sudan. Interviews did not indicate any clear strategic rationale for Finland's engagement in South Sudan beyond a general desire to support the efforts to alleviate the humanitarian crisis in South Sudan.

4.1 Overall funding trends

The total Finnish MFA humanitarian aid allocated to South Sudan during 2016-2021 is EUR 33.3 million as per Table 3. This makes South Sudan the country receiving the most humanitarian funding during 2016 to 2020 (the second largest is Yemen with 29 million, and third is Somalia with 21 million).

The total number of allocations during 2016-2021 period was 20, provided to four different partners, averaging EUR 1.7 million per allocation. There was one allocation for each partner each year. See also Table 3 below.

Table 3 Yearly allocations by Finland

YEAR	[EUR]	NO. OF ALLOCATIONS
2016	7,400,000	4
2017	7,625,000	4
2018	5,020,000	4
2019	6,100,000	4
2020	3,200,000	2
2021	4,000,000	2
Total	33,345,000	20

Source: MFA statistics

The annual allocations range from EUR 3.2 million (in 2020) to EUR 7.5 million (in 2017) with EUR 5.5 million on average. The years 2020 and 2021 saw the lowest Finnish humanitarian funding to South Sudan, with no humanitarian allocations during the first round of the 2022 allocations (May 2022). See also Figure 3 below.



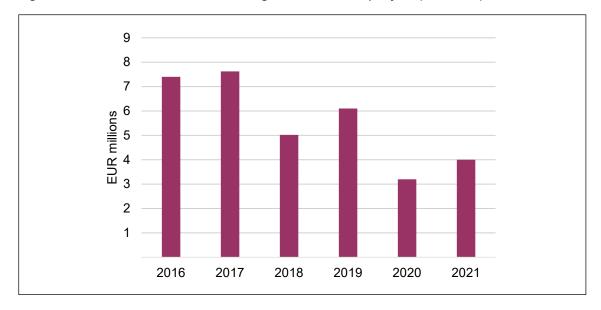


Figure 3 Total Finnish humanitarian funding for South Sudan per year (2016-2021)

Source: MFA statistics

4.2 Finnish funding in relation to humanitarian needs

As described in section 3, the international community contributes around USD 1.2 billion to the South Sudan HRP each year regardless of the size of the HRP request. The Finnish contributions of between EUR 3.2 and EUR 7.6 million correspond to between USD 3.5 and USD 8.1 million, or between 0.3% and 0.7% of the amount requested in the HRPs.¹⁰ Details are provided in Table 4 below.

Table 4 Finnish humanitarian funding to South Sudan

YEAR	HRP FUNDED [USD BILLION]	FINNISH HUMANITAR- IAN AID [EUR MILLION]	FINNISH HUMANITAR- IAN AID [USD MILLION]	FINNISH % OF HRP
2016	1,188	7.40	8.14	0.69
2017	1,165	7.63	8.39	0.72
2018	1,207	5.02	5.52	0.46
2019	1,138	6.10	6.71	0.59
2020	1,220	3.20	3.52	0.29
2021	1,143	4.00	4.40	0.38

Source: MFA statistics and UNOCHA FTS

¹⁰ Note: the data from FTS ((https://fts.unocha.org/) are slightly off compared to the data from MFA - in particular for 2016 and 2017. The reason for this could be that Finland did not register all its contributions in FTS, or it could be due FTS under-reporting.



Combining the data from Table 2 with the data from Table 4, a chart as per Figure 4 can be produced. The chart illustrates what was also stated in section 3: that even though the requests of the South Sudan HRPs have gone up over the years (the red columns), the global contributions (pink column) as well as the Finnish contributions (black line) have remained more or less the same. In fact, Finnish support was at its lowest in 2020, the same year that the HRP requested a record USD 1.9 billion.

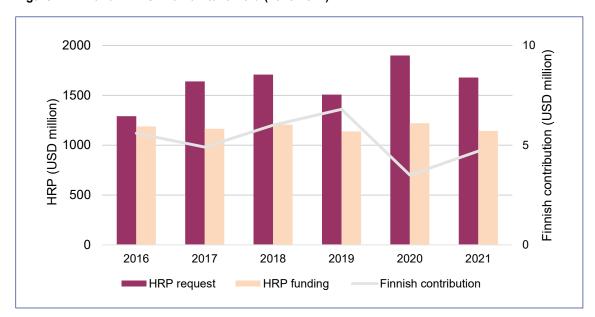


Figure 4 HRP and Finnish humanitarian aid (2016-2021)

Source: MFA statistics and UNOCHA FTS

A graphical presentation of the data from Table 1 in Figure 5 shows that although there has been a steady increase in the number of people in need and in the number of food insecure people there is no clear correlation between this and the Finnish contribution (the grey line).

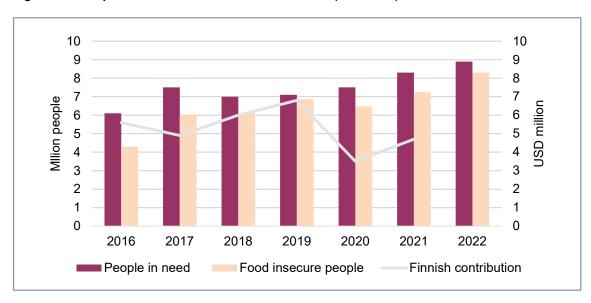


Figure 5 Development in needs vs. Finnish contribution (2016-2022)

Source: MFA statistics and UNOCHA South Sudan HRPs 2016-2022



4.3 Partners and sectors of assistance

Between 2016 and 2021, Finland provided funding to four different partners and to five different sectors as shown in Table 5 below.

Table 5 Allocation per partner and sector

ORGANI-		ALLOCATIONS [EUR]					
SATION	PROTEC- TION - AID TO DIS- PLACED	PROTEC- TION - OTHER	FOOD ASSIS- TANCE	MULTI- SEC- TOR	EDUCA- TION	TOTAL	%
Red Cross Movement		8,400,000		4,300,000		12,700,000	38.1
UNHCR	10,700,000					10,700,000	32.1
WFP			6,500,000			6,500,000	19.5
Finn- ChurchAid		525,000		1,320,000	1,600,000	3,445,000	10.3
Total	10,700,000	8,925,000	6,500,000	5,620,000	1,600,000	33,345,000	100

Source: MFA statistics

4.4 Partners

Of the four partners, the Red Cross Movement is the biggest recipient, having received more than a third (EUR 12.7 million) of the total Finnish humanitarian funding to South Sudan during 2016-21. The second largest recipient was UNHCR with almost a third of the funding (EUR 10.7 million). WFP and FinnChurchAid (FCA) received EUR 6.5 and EUR 3.5 million, respectively (see also Table 5). These organisations are also among the largest recipients globally. FCA is the smallest recipient, receiving 10% of the total humanitarian funding to South Sudan.

Illustrating the data from Table 5 in Figure 6 below provides a useful overview of the allocations to the different recipients. All four partners received funding every year until and including 2019. In 2020 and 2021, two organisations received funding each year. The Red Cross Movement received funding every year.



8 7 6 **EUR** million 5 4 3 2 2016 2017 2018 2019 2020 2021 ■ FinnChurchAid Red Cross movement WFP UNHCR

Figure 6 Allocations per year and per organisation (2016-2021)

Source: MFA statistics

4.5 Sectors

Almost EUR 20 million, or almost two thirds of the total Finnish humanitarian funding to South Sudan was allocated to protection. Of this a third (EUR 10.7 million) was given to UNHCR, registered as for 'Protection – aid to displaced' in the MFA database, fully in line with UNHCR's mandate. A quarter of the funding (EUR 8.9 million) was registered as 'Protection – aid to displaced', given to the Red Cross Movement. EUR 6.5 million was given to WFP, labelled as 'Food assistance', also in line with WFP's mandate. A total of EUR 5.6 million is registered as multi-sectoral, and a small amount, EUR 1.6 million, is provided to education through FCA (see details in Table 5 and Figure 7).

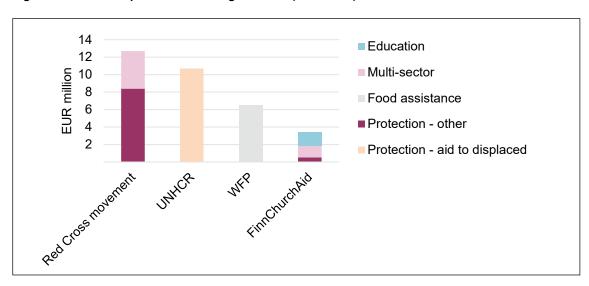


Figure 7 Allocations per sector and organisation (2016-2021)

Source: MFA statistics



5 Key findings

5.1 How relevant was Finnish humanitarian assistance 2016-March 2022?

5.1.1 To what extent was Finland's humanitarian assistance aligned with relevant policies and strategies in the context?

There is no specific Finnish Country Strategy for South Sudan. South Sudan is not a partner country of Finnish bilateral development assistance, and Finland has thus no Country Strategy for engagement with South Sudan. In South Sudan there are two main guidance documents for engagements: the UN & partners' HRP and the 2018 revitalised peace agreement (IGAD 2018). Both documents underscore that humanitarian assistance should be provided on the basis of needs, and should be adhering to the humanitarian principles.

Finnish alignment occurs through partners. The Finnish MFA is not engaging directly in South Sudan, thus Finland's engagement in South Sudan is indirect, occurring through partners, that ensure alignment with country-specific policies and strategies. The four partners funded during 2016-2021 all have a long presence in South Sudan, and are all part of the HRPs as well as the humanitarian coordination mechanism in South Sudan.

5.1.2 Alignment with the needs of the beneficiaries and stakeholders

Finnish humanitarian allocations to South Sudan are aligned with needs. As stated in section 3, the humanitarian needs in South Sudan are huge and the number of people in need of assistance has been increasing from 6 million in 2016 to currently (2022) almost 9 million people out of a total population of 12 million (UNOCHA 2021b). The people in need include 300,000 refugees and 1.6 million IDPs. The humanitarian needs are related to food insecurity, flooding, lack of access to basic services such as health, education, water and sanitation, and protection and legal services (UNOCHA 2021b). Finnish humanitarian assistance to South Sudan has been registered by MFA for four main specific sectors: food assistance, health, protection, and education. These sectors correspond with the priority sectors as per the South Sudan HRPs (see also Table 6 below).



Table 6 Main humanitarian priorities

MAIN HUMANITARIAN PRIORITIES (2016-2021)	FINNISH PARTNERS
Food assistance	WFP, ICRC, FinnChurchAid
Health	ICRC
Protection	UNHCR, ICRC
Education	FinnChurchAid
WASH	-

Source: UNOCHA, South Sudan HRPs 2016-2022

The choices of interventions in South Sudan are made by the partners themselves. The support to FCA and the Red Cross Movement (through Finnish Red Cross) was allocated based on specific applications - in the case of the Red Cross for the ICRC South Sudan general appeal, in effect being unearmarked at country-level. Support to WFP and UNHCR is provided as unearmarked funding for South Sudan as per contribution agreements.

Partners conduct needs assessments. All Finnish partners in South Sudan are well-experienced trusted partners that all confirmed that the support provided is aligned with needs. During interviews all partners were able to explain how needs were assessed at national level through the clusters and feeding into the Humanitarian Needs Overviews, and into the HRP. Partners also conduct their own specific assessments when required, e.g. in the 2018 FCA application references are made to a an FCA needs assessment conducted in the intended area of implementation; WFP assesses food security and vulnerability through the use of a specific tool, Vulnerability Analysis and Mapping (VAM), and UNHCR has its own general "Needs Assessment Handbook" and conducts e.g. Vulnerability Screening and Return Intentions surveys. All partners except ICRC also participate in relevant clusters (Food Security, Protection, Food Security and Livelihood, and Education), and through these receive up-to-date information.

Some targeting of vulnerable groups depending on the partners' mandates/specialities rather than depending on Finland's strategic direction. Common to all the Finnish partners in South Sudan is that they target some of the most vulnerable, including women and children, most of which are food insecure. Other specific vulnerable groups targeted by the organisations receiving Finnish support in South Sudan include:12

- WFP: School children, pregnant and lactating women, IDPs, returnees and refugees.
- UNHCR: Victims of Sexual- and Gender Based-Violence (SGBV), IDPs, returnees and refugees.

¹¹ See for example "South Sudan. Vulnerability Screening and Return Intentions - Bentiu PoC", UNHCR, January 2021, https://relief-web.int/report/south-sudan/unhcr-south-sudan-vulnerability-screening-and-return-intentions-bentiu-poc

¹² Information obtained from a number of appeals, supplementary appeals, country strategic plans, final reports and applications of the four Finnish partners in South Sudan.



- ICRC: Persons with disabilities, people requiring health assistance, including psychosocial support, pregnant and lactating women, Victims of SGBV, detainees, IDPs, returnees.
- FCA: School children, female-headed households, the elderly, persons with disabilities, IDPs, returnees.

All partners stated that there was no direct request or emphasis by Finland to target specific identified groups.

5.1.3 Adaption over time

The humanitarian situation in South Sudan has generally worsened over time, and most recently, floods and droughts have been added to the decade-long conflict/displacement crisis. Overall, the specific needs in South Sudan have remained similar over time - but, as shown in section 3, have been increasing.

Unearmarked allocations can be adapted freely, whereas changes to project-specific allocations can be difficult. For the three organisations receiving unearmarked funding to their general appeals (ICRC, UNHCR, and WFP), interviewees stated that necessary adaptions have been straight forward with no administrative requirements. Changes to the context happened e.g. when there were new displacements, flooding in an area, fighting, etc. For partners receiving project/ location specific funding, changes can be more difficult: one partner explained how conflict made continued implementation of planned activities impossible, hence they requested from MFA permission to change the location. MFA procedures for humanitarian funds, however, do not allow changes to contracts in the last three months of a contract – eventually the situation was solved by the partner getting permission to change location.

5.2 How effective was the assistance?

5.2.1 Delivery of results for beneficiaries and other stakeholders

Substantial results were achieved but limited data was available on direct results of Finnish allocations. There is no Finnish Country Strategy for South Sudan outlining intended expected results of Finnish support. Instead, the objectives of the South Sudan HRPs can be used as proxies for the expected results, bearing in mind that Finland contributed only around 0.5% of total financial contributions towards the HRPs, as per section 4.2. Although many results were reported at outcome level, some were only at output levels in terms of how many people reached.

WFP annual results reports for the country contain information at outcome level such as increases in school enrolment rates as a result of the provision of school meals. UNHCR also reports annually on e.g. increase in percentage of households with access to adequate shelter (see Table 7 below). One CSO partner reported, as required, specifically against targets for the dedicated Finnish humanitarian funding as defined in the application to the Finnish MFA. Other partners did not report directly on results of the Finnish funding only.



The objectives of the South Sudan HRPs have remained similar over time, with the exception of a 2017-onwards split of protection and resilience into two objectives. Based on these similarities, and using the 2021 HRP's objectives as a basis, the case study has applied three results areas that encapsulate the common objectives of the 2016-2021 HRPs (see Table 7 below). Identified contributions to these objectives by Finnish partner results are captured in the table, applying data mainly from the case study projects examined.

Overall, Finland has contributed – albeit in a limited way – to substantial overall humanitarian results in South Sudan, in the form of millions of people receiving access to basic services annually, dozens of health facilities supported every year, and hundreds of thousands of people with improved resilience.

Table 7 Selected results of Finnish humanitarian partners

AMALGAM- ATED HRP OBJEC- TIVES 2016-21	SELECTED KEY RESULTS BY FINNISH HUMANITARIAN PARTNERS
Reduce morbidity and mortality, protection threats and incidents for the most vulnerable populations.	In 2017, ICRC with Finnish support through the Finnish Red Cross united 150 families, of which 98 were children. ICRC also provided assistive devices and rehabilitative services to 3,200 physically disabled people from three centres and promoted the social inclusion of disabled people through sports. ICRC also supported twelve health centres and ten hospitals. In 2020, however, UNHCR did not manage to increase the percentage of IDP communities with active SGBV prevention and survivor centred protection, with the percentage falling from 64% to 59% compared to a targeted increase to 75%. For refugees and asylum seekers, UNHCR were able to ensure that all known SGBV survivors received appropriate support compared to 75% at the beginning of the year. Additionally, with regard to refugees and asylum seekers, 60 unaccompanied children and 645 separated children were identified and placed in appropriate care. In 2020, UNHCR also supported 10 health facilities in refugee camps and supported two referral hospitals, and ensured that 70% of host populations benefits from health services.
Ensure safe, equitable and dignified access to critical cross sectoral basic services to enable populations meet their basic needs in locations of high severity.	In 2016, FCA, with Finnish humanitarian funding, achieved the construction of five blocks of classrooms and provided training materials to 4,100 children and 60 teachers. In 2017, ICRC with Finnish support through the Finnish Red Cross, provided food assistance to over 500,000 people, household items to over 250,000 people and WASH to almost 400,000 people. ICRC also supported twelve health centres and ten hospitals. The Finnish Red Cross' direct support beyond funding was human resources and in-kind donation of 20,000 pieces of tarpaulins. In 2018, FCA with Finnish humanitarian MFA funding supported 2,510 of the most food insecure IDPs and host community households to gain access to essential lifesaving assistance. In 2019, WFP reached a total of 4.8 million people with food and cash assistance. WFP also provided meals for almost 500,000 school children resulting in a 2.5% enrolment increase, including a six percent increase in girls' retention in selected schools. UNHCR, in 2020, provided shelter and non-food item support to 8,100 people. The percentage of refugees and asylum seekers living in adequate dwellings increased from 39% to 100%, and the percentage IDPs in adequate dwellings increased from 10% to 21%. In 2020, ICRC with Finnish support through the Finnish Red Cross assisted over 350,000 people with food supplies and over 250,000 people with household items. ICRC also supported 23 health centres and three hospitals while the Finnish Red Cross additionally supported the operation with technical experts in health and with material support.



AMALGAM- ATED HRP OBJEC- TIVES 2016-21	SELECTED KEY RESULTS BY FINNISH HUMANITARIAN PARTNERS
Enable vulnerable people to recover from crisis, seek solutions to displacement in respect of their rights, and build resilience to shocks and stresses.	In 2017, FCA with Finnish humanitarian funding, restored food security and livelihood coping capacities for 1,620 vulnerable households. WFP in 2019 supported improvements in 19,000 smallholder farmers' productivity and incomes, by assisting with market access and training on improved post-harvest management of the food they produced. WFP was also able to purchase 708 tons of cereals from 3,736 individual smallholder farmers. Furthermore, WFP supported construction and maintenance of roads and bridges aiming facilitate households' access to markets and basic services; in 2019, WFP for example completed construction of 28 km of feeder roads and a 120 m bridge. WFP also assisted nearly 600,000 people to improve their self-sufficiency and resilience to future shocks.
	In 2020, UNHCR provided 4,000 refugees and asylum seekers with agricultural inputs to enhance staple crop production, leading to a yield of about 450kg/feddan (~ 1 acre). An additional 2,160 households were supported with vegetable kits to boost vegetable production and enhance nutritional status of the households. UNHCR also provided 700 people of concern with entrepreneurship/business training to promote generation of business ideas.

Source: FCA application South Sudan 2018; ICRC 2018, UNHCR 2020, WFP 2019.

5.2.2 What results were delivered for non-discrimination, including gender equality and the empowerment of women?

Some details of results for non-discrimination are available, including gender quality and women. The recent HRPs for South Sudan include the percentage of women among the beneficiaries and the percentage of persons with disabilities, i.e. 50% and 13%, respectively, in the 2020 HRP (UNOCHA 2020b). The South Sudan Humanitarian Response in Review annual reports do contain sector-wise gender-disaggregated data on people reached; for example, in 2016, 44% of people reached with education were women/girls, and for food security and livelihoods 54% of beneficiaries were women/girls (UNOCHA 2017). The figures four years later, for 2020 are similar with 42% women/girls among the beneficiaries reached with education, 54% of beneficiaries of food security and livelihood interventions were women/girls, and 60% of protection interventions were women/girls (UNOCHA 2021a).

There are few details on direct Finnish results regarding non-discrimination or gender equality in Finnish partners' reports. FCA reported reaching 1,350 female-headed households, a little more than half of the total households reached for the specific activity. ¹³ Some information on gender and non-discrimination is available also from WFP, which for example reports that in 2019, 58% of the 4.8 million beneficiaries were women, that 92,000 persons with disabilities were reached, and that WFP adopted disability friendly and responsive monitoring and analysis, including adjustments of access support and communication methods. ¹⁴ ICRC reports on the number of persons with

¹³ Final report from Finnish partner in South Sudan.

¹⁴ See for example UNHCR Year-end reports for South Sudan, https://reporting.unhcr.org/southsudan#toc-narratives, and ICRC annual reports on https://www.wfp.org/publications/annual-country-reports-south-sudan



disabilities they assist, e.g. in 2017 they provided assistive devices and rehabilitative services to almost 3,200 persons with disabilities.

Most of the results, therefore, focus on the quantitative aim of 'reaching women and girls', rather than a more progressive model of gender equality, or including empowerment-related dimensions. The case study cannot determine whether these reflect wider trends in Finnish humanitarian assistance.

5.2.3 To what extent has Finland supported the promotion of localization of aid?

By default, Finland works through local partners. According to interviews with all Finnish partners in South Sudan, there is no strategic effort by the Finnish MFA to guide localisation of aid in South Sudan. The multilateral organisations and ICRC do, however, work through local partners, including the South Sudan Red Cross, but have not received any directive or guidance from Finland in this regard, Thus, there are no evident connections between Finnish humanitarian funding and localisation in the context.

5.2.4 Other factors in effectiveness

Finland is not visible in South Sudan beyond partners. According interviews with other doors and non-partner UN organisations, stakeholders in South Sudan not receiving Finnish humanitarian funding have little knowledge on Finnish humanitarian assistance. The portfolio falls under the Finnish Embassy in Addis Ababa, but there are no lines of contact between non-partners or other donors and the Finnish Embassy. Finland's visibility in South Sudan is accordingly low.

5.3 How efficient was the assistance?

5.3.1 Flexibility and adaptiveness

Finland is known by partners in South Sudan as a flexible donor. The flexibility of humanitarian assistance is key to the ability to adapt when conditions change – as happens frequently in protracted humanitarian crises, such as that of South Sudan. In interviews Finland was praised by partners for its flexibility in the use of allocations, with unearmarked funding particularly appreciated, because of its responsiveness to needs. One partner also described how this flexibility in the use of the allocation allowed the partner to implement activities that perhaps would fall outside the scope of what less flexible donors would allow, and thus had the potential to be applied towards longer-term aims and objectives.

Large proportions of allocations to the UN or the Red Cross Movement have supported efficiency. Allocating 90% of the Finnish support to South Sudan to the UN or the Red Cross Movement provides Finland with the ability to support the large-scale international response to the crisis without incurring – particularly important given its limited human resources – major administrative



burdens. According to interviews with Finnish multilateral partners, the support was appreciated by partners.

Finland does not support the South Sudan Humanitarian Fund. Globally, Finland does not contribute to humanitarian Country Based Pooled Funds (CBPFs), thus also not the South Sudan Humanitarian Fund. CBPFs are explicitly set up as instruments to facilitate smaller contributions to humanitarian crises, and to allow flexibility for allocation to areas of greatest need, with maximum efficiency. The objectives of the CBPF for South Sudan, the South Sudan Humanitarian Fund, are to (UN 2022b):

- 1. Support life-saving and life-sustaining activities while filling critical funding gaps;
- 2. Promote needs-based assistance in accordance with humanitarian principles;
- 3. Strengthen coordination and leadership primarily through the function of the Humanitarian Co-ordinator and by leveraging the cluster system;
- 4. Improve the relevance and coherence of humanitarian response by strategically funding priorities as identified under the HRP;
- 5. Expand the delivery of assistance in hard-to-reach areas by partnering with Non-Governmental Organisations (NGOs).

The South Sudan Humanitarian Fund is managed by UNOCHA and made available to national and international NGOs, the Red Cross and Red Crescent Movement and UN agencies in order to reach the most underserved areas, including with a view to enhance the capacity of national NGOs (UN 2022b). While Finland's profile of current contributions in theory permits greater emphasis on specific themes of interest, arguably the contributions do not increase Finland's visibility within South Sudan, partly because the unearmarked contributions to WFP, UNHCR and the International Committee of the Red Cross (ICRC) are small parts of very large pools. In 2019 for example, the South Sudan Humanitarian Fund allocated USD 80 million of which almost 60% was to address acute needs among the most vulnerable, almost 30% to protection, and 12% to resilience, reaching a total of 2.5 million people, including 1.1 million IDPs (UNOCHA 2020c). According to various interviews, the fund would welcome additional funding.

Increased efficiency through reduced number of partners. As described in section 4 there has been a reduction in the number of partners over the years. From 2016 to 2019, Finland funded four partners with its humanitarian assistance. In 2020 and 2021 the number of partners was reduced to half, to two from four, while the funding was reduced only by around a third (from EUR 11.1 million to EUR 7.2 million). There was thus a small relative reduction in the administrative burden during 2020 and 2021. In 2022 so far (May 2022) no Finnish humanitarian funds have been granted to South Sudan. No information has been available to the evaluation team that the reduction in the number of partners has been a deliberate strategic decision, and, according to interviews, partners did indeed apply for funds for South Sudan with the anticipation that funding could be granted. With no humanitarian partners on the ground, Finland's visibility will remain very low in South Sudan, and there will be no obvious entry point if more detailed information about the situation in South Sudan is required.



5.3.2 Timeliness

Finnish funding cycle does not match the planting and rainy seasons of South Sudan.

Funding to CSOs is provided in March/April after assessments of proposals submitted in the last part of the preceding year. Months can be a long time in a protracted crisis and the context can change rapidly. What is more critical is that the implementation of humanitarian assistance in South Sudan is highly dependent on the rainy season, running from April/May to October through when most of the country is cut off. Supplies need to be prepositioned before the rain, and considering procurement time and transport, time is too short between the approval of applications and the onset of rain. March/April is also planting season for most crops in South Sudan, see Figure 8. According to interviews, any efficient interventions in the form of supply of inputs or training in terms of support to e.g. agricultural production in South Sudan are therefore to be funded and planned earlier in the year, especially if supplies are to be prepositioned.

Maize, Millet, Sorghum (South/main) Maize, Millet, Sorghum (South/main) Maize (Unimodal) Millet &Sorghum (Unimodal) Month F J M A J J Α S O Ν D M Lean Period Sowing

Figure 8 South Sudan crop calendar

Source: FAO 2021

Growing

Harvesting

As per analysis of samples of contribution agreements, Finnish funding to multilateral organisations was found to also be provided around April. Partners stated that the timeliness of the funding was relatively early in the year, and thus appreciated. The main difference between multilateral organisation and CSOs is that the Finnish funding to the multilateral organisations is unearmarked, and that multilateral organisations can apply funds from other donors to e.g. preposition supplies or conduct training in preparation of implementation.



5.4 How coherent was the assistance?

5.4.1 External coherence: To what extent did Finland's humanitarian assistance align with the strategic direction and priorities of its partners in the context?

The Humanitarian Country Team is led and chaired by the Humanitarian Coordinator, and has the responsibility to set the strategic direction of the humanitarian response. The Inter-Cluster Coordination Group coordinates the operationalisation of the response. The next layer in the main humanitarian coordination mechanism in South Sudan is the Cluster System as implemented by UNOCHA for coordination of multi-agency responses. There are currently ten clusters in South Sudan with three of the four Finnish partners in South Sudan participating actively:

- WFP is leading the Food Security and Livelihood Cluster;
- UNHCR is leading the Protection Cluster and is co-leading the Camp Coordination and Camp Management Cluster together with IOM leading;
- FCA is an active member of the Food Security & Livelihoods Cluster as well as the education cluster, also at global level; and
- ICRC participates in the cluster system as an observer and coordinates to the extent possible.

Finnish supported partners do participate in the cluster coordination system and their projects are included in the HRP, ensuring project-level coherence. However, partners did not indicate requests from MFA to feedback information received within cluster meetings on the humanitarian situation in South Sudan.

Finland does not directly participate in South Sudan coordination mechanisms and is not engaged beyond partners. Finnish MFA has, as described earlier, no direct presence in South Sudan, and does not participate in any humanitarian coordination fora. There is a humanitarian donor group, chaired by DG ECHO, which meets on a weekly basis. The group has a mailing list to which donors that are not present in South Sudan can also subscribe. As per current members of the group, Finland is not on the mailing list, unlike some other donors who are also not present in South Sudan, such as Denmark and Ireland.

Thus, Finland is not actively seeking information on the situation in South Sudan or on how other donors assess the performance of the Finnish partners in South Sudan. As described in section 5.2.4 above, Finland is not directly engaged in South Sudan beyond its support to partners, of which at the time of writing (May 2022), none remain.



5.4.2 Internal coherence: To what extent was Finland's humanitarian assistance well-coordinated internally?

Limited internal coherence. The analysis of documents in the form of applications from CSOs for humanitarian assistance to South Sudan or of contribution agreements for UN organisations reveals no references to synergies with other Finnish interventions. Interviews with stakeholders and MFA staff also did not bring to light any synergies or detailed awareness of other Finnish-financed interventions in South Sudan. This indicates limited coherence over time across the different types and modalities, e.g. CSO funding, of Finnish assistance provided to South Sudan.

5.5 How connected was Finnish assistance to international commitments and to other forms of cooperation?

In recognition of the complex South Sudanese context with prolonged conflict, chronic vulnerabilities and immense needs, the UN Country Team and the Humanitarian Country Team in 2019 agreed on a new way of working that would consider the peace-humanitarian-development with two collective outcomes: to reduce the vulnerability of communities in non-conflict areas to food insecurity and to improve access to SGBV protection and prevention services. New priorities and outcomes are expected to be developed based on an end-2021 evaluation (UNOCHA 2021b).

The UN's Peacebuilding Fund (PBF) administered by UNDP's Multi-Partner Trust Fund Office is also providing some limited support to South Sudan (UN 2022c). In 2020, the PBF funded UN agencies with a total of USD 36 million (UN 2021).

Finland has indirectly supported nexus projects in South Sudan. There was no evidence of explicit direct Finnish funding to double or triple-nexus projects, but interviews with partners revealed that they were all, when relevant and possible, trying to implement with a view to longer-term impacts. Documentary evidence also points to partners engaging with nexus-like approaches in the form of resilience: the WFP 2018-20 Country Strategy Plan for example has objectives for building resilience and improving market access (WFP 2017). As a specific example of direct funding to nexus interventions, the evaluation team was informed by a partner of a specific example of Finnish humanitarian funding being used for implementation of humanitarian assistance with a longer-term perspective. According to interviews there is, however, no explicit demand or push by the Finnish MFA to implement nexus activities in South Sudan through the use of Finnish humanitarian assistance.

¹⁵ Temporary education structures were built with better-quality foundations and skeletons, which later on eventually could be used as a basis for more permanent structures – the approach has allegedly been taken up by UNICEF for use as a standard within South Sudan (interview with Finnish partner in South Sudan).



6 Conclusions

Without a Country Strategy for South Sudan, there is no clear strategic objective for Finnish humanitarian assistance to South Sudan beyond contributing to general humanitarian needs. This also means that the use of Finnish humanitarian assistance for South Sudan is not strategically directed by Finland, but rather more indirectly by partners, within the framework of the relevant Humanitarian Response Plan.

Finnish humanitarian assistance to South Sudan is not visible within the wider diplomatic or humanitarian missions, nor in the humanitarian architecture and coordination mechanism. The limited visibility of Finland's humanitarian assistance means by implication that Finland neither seeks nor achieves, through its humanitarian funding at least, influence within the South Sudan humanitarian community.

However, engagement by partners in the cluster systems, alongside their capacity to conduct needs assessment, coupled with the fact that most of the funds are unearmarked to South Sudan, provide conductive conditions for relevance. It also helps ensure that the Finnish support has strong adaptative capacity in a dynamic context like South Sudan.

As Finnish funding constitutes only a very small proportion of the total humanitarian funding to South Sudan, results directly attributable to Finnish support are limited. Specific results for non-discrimination, gender equality were limited to quantitative numbers of beneficiaries reached, indicating a narrow understanding of gender equality and limited effectiveness in this area.

The choice of largely unearmarked funding is well-suited to a volatile and dynamic context such as South Sudan, which frequently necessitates change of location, approach, etc. Earmarked project-specific allocations pose greater challenges, especially when implementation of nexus-like interventions such as training or distribution of productive assets are disrupted by e.g. people fleeing. The one-year programme cycle, especially with allocations made in March/April, does not however consider the seasonal variations in South Sudan with much implementation impossible between May and October due to rain and the main planting season beginning around April.



7 Issues for consideration

If Finland is to continue support to South Sudan, the following issues could be considered:

- The relatively small Finnish contribution to the South Sudan crisis raises the question of whether support to South Sudan at the hitherto level and number of partners is the most effective use of funding. If Finland wants to continue supporting the humanitarian crisis in South Sudan with fewer partners, and Finland wants to support localisation, future support could be provided through the CBPF, the South Sudan Humanitarian Fund. Contributing to the South Sudan Humanitarian Fund could provide some gain in terms of increased visibility, would provide benefits in terms of targeted needs-based assistance, would support the localisation agenda through funding of national NGOs, and would enable access to broader discussions around allocations of humanitarian funds in South Sudan.
- If Finland wants to be able to influence the humanitarian response in South Sudan, more visibility is required, including engaging with other donors, and, as a minimum keeping abreast by the humanitarian developments through e.g. being plugged into relevant communication channels.
- If Finland wants to ensure coherence in South Sudan, it would require a more comprehensive overview of the Finnish support and how the support fits into the overall humanitarian landscape, possibly guided by a strategy (or, at minimum, a set of broad objectives, for Finland's overall engagement in South Sudan).
- A higher level of Finnish engagement in South Sudan could facilitate a bigger Finnish
 push for increased attention to non-discrimination and other cross-cutting issues. This
 could include, as a starting point, Finland insisting on proposals and reports containing disaggregated data on e.g. gender of beneficiaries, persons with disabilities, etc. A
 more progressive approach to gender equality, requiring partners to demonstrate how
 they will support a more strategic approach to gender rights, would be useful.
- To facilitate effective planning of implementation, Finnish assistance should be timed to coincide with the seasonal calendars of South Sudan and/or funding should be multi-annual.
- Increased focus on nexus interventions, be it double or triple nexus, can also be facilitated by allocation of multi-year funding to partners, or through provision of funding to pooled funds such as the South Sudan Humanitarian Fund which can carry over funds to the next year.



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