



**WOMEN REFUGEES IN LEBANON
AND THE CONSEQUENCES OF LIMITED
LEGAL STATUS ON THEIR HOUSING,
LAND AND PROPERTY RIGHTS**

LEBANON, MARCH 2016

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NRC ICLA Lebanon

The Norwegian Refugee Council (NRC) is an independent, international, humanitarian, non-governmental organisation which provides assistance, and protection and contributes to durable solutions for refugees and internally displaced people worldwide. NRC has been working in Lebanon since 2006 providing humanitarian assistance to communities affected by displacement. In early March 2012, NRC commenced its Information, Counselling and Legal Assistance (ICLA) programme in Lebanon, with a focus on assisting refugees and displaced persons to understand and enjoy their rights. All NRC services are free of charge.

For further information about NRC Lebanon's ICLA programme or to find out about making legal referrals or receiving NRC training or awareness sessions on legal issues, please contact Ms. Julia Herzog-Schmidt, ICLA Specialist at julia.herzog-schmidt@nrc.no or 01 366 113.

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1. EXECUTIVE SUMMARY

The ability to stay legally in Lebanon has proved to be central to all aspects of refugee lives. As Lebanon has not ratified the 1951 Refugee Convention,¹ Syrian nationals and Palestinian refugees from Syria (PRS) seeking safety and protection must obtain entry and stay documentation to be considered 'legally' present by the Lebanese authorities.² Strikingly, recent studies have shown that 53-70% of Syrian refugees and 86% of PRS do not have the ability to stay legally in Lebanon.³ Without this 'legal stay', not only do refugees face possible criminal sanctions (including arrest, detention, departure orders or deportation) but they also face many consequent obstacles. These include limited freedom of movement, lack of work or livelihood options, inability to access services and humanitarian assistance (such as healthcare, education or food), lack of access to justice and limited access to civil documentation (such as birth registration or marriage registration). Many of these obstacles contravene Lebanon's obligations to uphold human rights and result in refugees struggling to survive in Lebanon while trying to deal with the host country's growing resentment about their continued presence, leaving little hope or choice.

With an evolving situation for refugees, characterised by a more restrictive environment limiting the ability to work or move freely without legal stay, cuts in humanitarian assistance, no new registration with UNHCR and protracted displacement, refugees have increasingly limited options. Within this context, understanding the situation for women refugees in particular, including the protection risks they face, is essential in order to develop and provide appropriate interventions taking their perspective and specific challenges into account. While issues are identified and considered individually, working out how they connect in the bigger picture is also necessary to have a comprehensive approach towards understanding the implications for refugees in Lebanon.

This briefing is based on data collected through NRC fieldwork and then analysed in relation to the current context for refugees in Lebanon. The aim is to highlight some of the consequences of limited legal status, with a specific focus on the coping mechanisms of refugees to try to maintain their housing each month and what impact such, often negative, coping mechanisms have on women in particular. While the consequences identified are not exhaustive, they confirm many of the issues identified from NRC fieldwork and highlight those that require on going assessment and analysis.

¹ The Convention relating to the Status of Refugees, 28 July 1951.

² As a non-signatory to the 1951 Convention relating to the Status of Refugees (the 1951 Refugee Convention) or its 1967 Protocol, Lebanon does not provide for any special status for refugees from Syria, requiring all to obtain valid entry and stay documentation. Instead of upholding the right to allow people 'to seek and to enjoy ... asylum from persecution' as stated in the Universal Declaration of Human Rights (which is incorporated into domestic law), Lebanon considers persons fleeing the conflict to be illegally present in Lebanon if they do not have valid entry or stay documentation.

³ University of St. Joseph, Beirut, Survey on Perceptions of Syrian Refugees in Lebanon, 2015, page 12, available at [<https://data.unhcr.org/syrianrefugees/download.php?id=93999>]; and UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: In a state of uncertainty, September 2015, available at [http://www.unrwa.org/sites/default/files/in_state_of_uncertainty_prs_in_lebanon.pdf].

a) Main findings

The main findings and analysis from NRC's research and fieldwork data, which are elaborated on in the briefing, are set out below.

- **Limited housing for refugees:** In a non-camp setting with limited shelter assistance available, the majority of refugees have to pay rent for their housing. Rent continues to be one of the main expenditures of refugees (along with food and healthcare) with the high costs of renewing or regularising residency visas not even included in the calculations for the Survival Minimum Expenditure Basket for refugees in Lebanon.⁴ Finding the money to pay rent is increasingly difficult for refugees in Lebanon, resulting in negative coping mechanisms and the potential for exploitation. With the continued conflict in Syria, safe return is not a viable option and refugees look set to remain displaced and in need of protection and, amongst other things, housing for their families. In accordance with international human rights law, which Lebanon has incorporated into its domestic legislation, all persons have a right to adequate housing, which should include having security of tenure, to guarantee legal protection against forced eviction. In addition, women are entitled to the same rights as men with no discrimination permitted, including for housing, land and property (HLP) rights. Nevertheless, 55% of refugees live in substandard and insecure shelter, there is an increase in the number of informal settlements⁵ and many refugees are at risk of eviction due to their inability to continue paying rent or for other reasons, often related to so-called security rationale or lack of community acceptance.

- **Changing gender roles:** Since being displaced and, as refugees in Lebanon, many women are having to take on different responsibilities to those they have had previously, including negotiating and arranging for housing for their families.

- **Lack of options for refugee women facing violence:** In situations of gender-based violence, such as violence in the home, women often do not have any option to leave their home as they usually remain dependent on their family for housing. Lack of rights to their home can also be a result of not being named on any lease agreement or not having any separate income or ability to pay rent.

- **Challenges trying to maintain legal stay:** Renewing or regularising residency visas for refugees has become incredibly difficult, with women often dependent on their husbands or male relatives to maintain legal stay. Renewal or regularisation of residency visas is currently based on households with the male head of household's ability to renew or regularise affecting the rest of the family. Furthermore, female heads of household may face challenges renewing or regularising legal stay for their household, particularly if unable to prove they are the head of household.

- **Consequences of lack of legal stay:** In particular, limited freedom of movement has a consequent effect on most aspects of refugee lives with women often required to move around more as they are perceived to be less likely to face arrest or detention.

⁴ The Survival Minimum Expenditure Basket (SMEB), the minimum amount of spending for a refugee household (USD435 per average family of five), as calculated by the Lebanon Cash Working Group, has determined that the main expenditure for refugee families is on food, rent and healthcare.

⁵ UNHCR, Syrian refugees in Lebanon: Quarterly snapshot, January – March 2015, available at [<https://data.unhcr.org/syrianrefugees/download.php?id=8804>].

- **Risk of exploitation:** The required documents and fees for renewal or regularisation of residency visas, including the need for documents from landlords and a pledge of responsibility from a ‘sponsor’ for those not registered with UNHCR creates an asymmetric power dynamic which puts refugees, particularly women, at risk of exploitation.

- **Lack of access to justice:** Refugees facing housing disputes or the threat of eviction have little recourse to justice. Where there is potential access to community dispute resolution mechanisms, it is important to support access to them for all refugees, including women.

b) Recommendations

These recommendations have been informed by the findings from NRC’s research and ongoing field experience and analysis.

To the Government of Lebanon

The Government of Lebanon should develop a comprehensive refugee policy and appropriate administrative procedures grounded in refugee rights for all refugees from Syria in Lebanon (including PRS). In accordance with Lebanon’s human rights commitments, incorporated into national law, the Government should apply the spirit and content of these to all persons on its territory, including refugees. More specifically the Government should consider the points set out below.

- Update housing strategies to address pre-existing shelter issues that have been exacerbated by the presence of large numbers of refugees and develop alternatives to providing shelter to scale.
- Review the entry and residency renewal and regularisation regulations to ensure they are clearer, applied consistently and less onerous so that refugees can fulfil their requirements without resorting to negative coping mechanisms.
- Waive all fees required to enter Lebanon and renew/regularise residency, including the annual fee of USD200 per person aged 15 years’ old and above and the cost of compiling the numerous documents required for entry and renewal/regularisation of residency.
- Waive any requirement for refugees to sign any pledge (such as the housing pledge, pledge not to work) or obtain sponsorship in order to renew their residency in Lebanon.
- Waive any requirement for women refugees to show additional documents to prove they are the head of household when renewing/regularising residency.
- Restart UNHCR registration for all refugees.
- Support more flexibility (at local and national levels) in accepting alternative documentation from refugees who have come to Lebanon with limited documentation and may not have a valid Syrian ID card or a Syrian passport. Allow other documents, including identity documentation that may have expired or is damaged, for daily life, such as crossing checkpoints, renewal of stay, obtaining residency visas for children who turn 15 while in Lebanon, accessing services (including healthcare), approaching police or legal institutions, and in order for refugees to register marriages and births in Lebanon.

- Create procedures under which refugees can employ independent coping mechanisms without being penalised or criminalised, including facilitating livelihoods opportunities to fill gaps in the labour market and supporting livelihoods interventions by humanitarian and development actors.

To International Governments and Donors to Lebanon

International governments and donors should continue to advocate and provide adequate financial and technical support to the Government of Lebanon to cope with the refugee situation in Lebanon. Such support should include measures so that:

- The Government of Lebanon establishes and upholds a comprehensive refugee policy grounded in refugee rights and in accordance with Lebanon’s human rights obligations. Refugees in Lebanon should not be considered as illegal or irregular migrants.
- The Government of Lebanon establishes clear and appropriate administrative procedures which uphold the rights of all refugees in Lebanon. Women’s rights and the principle of non-discrimination have to be respected.
- The humanitarian community is able to operate to support the Government of Lebanon to support all refugees in Lebanon and uphold the rights of all refugees in accordance with established humanitarian and legal principles.
- Humanitarian and development interventions are supported to take into account the needs and challenges faced by women in particular so that appropriate responses are implemented.
- Ensure assistance to Lebanon does not exacerbate inequality in access to rights for women, such as allocating assistance solely to male heads of households but in joint names.

To Humanitarian and Development Actors

Humanitarian and development actors should support the Lebanese authorities to establish a comprehensive refugee policy grounded in refugee rights and administrative procedures which uphold the rights of all refugees. This policy should ensure that refugees have access to affordable shelter, are able to cope independently and enjoy the following rights: freedom of movement, access to all necessary services, access to territory, access to shelter, access to justice, access to livelihoods and any other basic rights. These should include the points set out below.

- Strengthen monitoring and analysis on specific priority issues affecting refugee rights so that programming and advocacy are evidence-based. Ongoing protection monitoring efforts on relevant topics should be harmonised and strengthened amongst all protection actors.
- Strengthen information and advisory services to refugees, including legal assistance (representation and the use of Collaborative Dispute Resolutions mechanisms) to refugee women who may face particular challenges accessing formal and informal justice mechanisms.
- Provide assistance based on need and vulnerability, not registration status or legal stay, and ensure access to services is possible and available in areas where movement restrictions are more severe.

- Engage with national and local authorities, particularly customary and religious authorities on all forms of administrative procedures and dispute resolution mechanisms.
- Consult and involve a diverse range of women in programming and support empowerment of women in leadership and decision-making.
- Ensure programming does not exacerbate inequality in access to rights for women, such as including women's names on documents connected to receiving assistance.
- Support initiatives to standardise lease agreements between landlords and tenants that safeguard landlords' property rights while also protecting tenants against forced eviction and exploitation. Standard agreements should be in the joint names of male and female heads of households and should ensure that all relationships between tenants and landlords are regulated in accordance with Lebanese legislation.

2. PURPOSE OF BRIEFING AND METHODOLOGY

This document is intended to provide information and analysis on the situation faced by refugee women in Lebanon, focusing on the challenges of obtaining or maintaining legal stay and the resulting risks faced by refugee women in accessing their rights.

The information is based on NRC's ongoing humanitarian operations in Lebanon, particularly from its ICLA programme complemented by focus group discussions and key informant interviews with refugee women since November 2014.⁶ The methodology of this report is a combination of NRC's research and case analysis from its work in Lebanon.

NRC Lebanon research – refugee rights to legal status and HLP rights in Lebanon

NRC, No Place Like Home: An Assessment of the Housing, Land and Property Rights of Palestinian Refugee Women in Camps and Gatherings in Lebanon, December 2013, page 59, available at www.womenshlp.nrc.no

NRC, ICLA Programme reports on limited legal status, (1) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled, December 2013, (2) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South, April 2014; and (3) NRC and International Rescue Committee, Legal Status of Refugees from Syria: Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon, June 2015, all available at http://www.nrc.no/lebanon#.VjT_SLfhCM8

NRC, Increasing Security of Tenure through Relationship Building and Written Lease Agreements: An Assessment of NRC's Housing, Land and Property Rights Pilot Project in Lebanon, August 2014, page 8, available at http://www.nrc.no/arch/_img/9195238.pdf

While displacement disrupts all lives affected, there is often a disproportionate effect on women's lives and their ability to access rights, including HLP rights.⁷ There are often demographic changes related to conflict, leading to higher numbers of female-headed households or women supporting their families because men are not present, are not able to move freely, or feel particularly disempowered because of the family's situation of displacement.

In Lebanon, similarly to other contexts of displacement, women's HLP rights are often neglected in the humanitarian response.⁸ Interventions often do not take into account women's perspectives, resulting in entrenching discrimination, increasing the risk of exploitation or exacerbating unequal situations. An example of this is the concept of providing assistance for a family in the name of the male head of household. This has also been noted in NRC's research on the HLP rights of Palestinian refugee women in Lebanon where houses allocated to Palestinian refugees in official camps have been mainly allocated to families in the name of the male head of household.⁹

⁶ The basis for this report are NRC's research and NRC's ongoing assessment of the legal and protection context for refugees.

⁷ NRC, Life Can Change: Securing housing, land and property rights for displaced women, 2014, pages 15 – 16, available at [\[womenshlp.nrc.no\]](http://www.womenshlp.nrc.no). This report is part of NRC's global initiative on strengthening displaced women's HLP rights. NRC has conducted research in a number of countries, including Afghanistan, Central African Republic, Cote d'Ivoire, Ecuador, Lebanon, Palestine (Gaza) and South Sudan. All reports and related information is available at [\[womenshlp.nrc.no\]](http://www.womenshlp.nrc.no).

⁸ NRC, Life Can Change: Securing housing, land and property rights for displaced women, 2014, pages 8 – 11, available at [\[womenshlp.nrc.no\]](http://www.womenshlp.nrc.no).

⁹ NRC, No Place Like Home: An Assessment of the Housing, Land and Property Rights of Palestinian Refugee Women in Camps and Gatherings in Lebanon, December 2013, page 33, available at [\[womenshlp.nrc.no\]](http://www.womenshlp.nrc.no).

This underlines another NRC finding in Lebanon and other countries that a woman's rights are often determined by her relationship with a man – usually her husband or a male relative and so a woman is not considered to have individuated rights.¹⁰ Understanding this and finding ways to redress this inequality in accordance with the relevant culture and context is an important opportunity for actors providing humanitarian or development interventions.

From NRC Lebanon's continued support to Palestinian refugees from Lebanon and refugees from Syria, it has collected a range of data on the situation for women refugees.

With specific research,¹¹ on going fieldwork, particularly through its ICLA and Shelter programmes,¹² NRC has a strong understanding of the context for women refugees. This has confirmed that many of the findings that NRC has identified globally¹³ also apply to Lebanon and has been a useful starting point to test some of the recommendations for stronger, inclusive and more equitable programming for those affected by displacement.

The main aims of this briefing are to:

1. Highlight the increasingly restrictive environment for refugees in Lebanon and the particular risks faced by women;
2. Focus on the HLP rights of refugees and the effects on women of coping mechanisms used to obtain adequate housing and security of tenure;
3. Strengthen the understanding of relevant stakeholders, including the humanitarian and development communities, about the consequences of limited legal status on refugee rights;
4. Underline the importance of including such an understanding and gender-sensitive approach to humanitarian and development interventions.

Reference to refugees primarily focuses on Syrian refugees and PRS.

When there is any specific difference between the types of refugees, this will be noted.

3. CURRENT CONTEXT

Lebanon continues to face an unprecedented situation in which one-quarter of its population is comprised of refugees, with nearly 1.1 million refugees registered with UNHCR – more than 50% of them are women and girls.¹⁴ Overall, there are at least 1.5 million refugees in Lebanon, which includes an estimated 300,000 unregistered refugees¹⁵ and approximately 44,000 PRS – more than 50% of them are women.¹⁶ Refugees from Syria have been arriving in Lebanon since 2012 as a result of the conflict in Syria. Registration with UNHCR in neighbouring countries, including Lebanon, has offered protection to refugees seeking safety and has assisted with the coordination of humanitarian assistance for refugees.

Since refugees started to arrive in Lebanon, their main needs have been shelter, WASH, food, healthcare, as well as education, livelihoods and protection. With a continued decrease in humanitarian funding to Lebanon¹⁷ and an increasingly prohibitive environment for refugees, the needs of refugees continue to be significant with many struggling to survive and turning to negative coping mechanisms.¹⁸ The situation for PRS has often been even more severe with many at further risk as the cuts to UNRWA funding have meant that minimal assistance is reaching those most in need.¹⁹

The number of unregistered refugees is likely to increase since UNHCR, following demands from the Government of Lebanon, suspended the registration of refugees as of 6 May 2015. Since then, no refugees that entered Lebanon after 5 January 2015 have been able to register with UNHCR and those that had entered after this date and had been initially registered were subsequently de-registered by UNHCR. Except for the registration of new-born babies to refugee parents already registered with UNHCR, all registration has been suspended. In addition, refugee files are routinely inactivated, usually when refugees do not show up for collection of assistance or to renew their registration. There may be legitimate reasons for not turning up or being in contact with humanitarian organisations, including lack of freedom of movement, inability to pay transport costs or the perception that there are no benefits to being registered as a refugee. Between 1 January and 1 September 2015, the overall number of registered Syrian refugees has decreased by over 149,000,²⁰ who, consequently, are no longer able to benefit from a range of humanitarian assistance or renewal of their residency visa as a refugee registered with UNHCR.

¹⁰ NRC, Life Can Change: Securing housing, land and property rights for displaced women, 2014, page 25, available at [womenshlp.nrc.no].

¹¹ Such NRC's report on Palestinian refugee women - NRC, No Place Like Home: An Assessment of the Housing, Land and Property Rights of Palestinian Refugee Women in Camps and Gatherings in Lebanon, December 2013, page 59, available at [womenshlp.nrc.no].

¹² All NRC Lebanon programmes have databases and regularly collect data on NRC beneficiaries.

¹³ These findings include challenges for displaced women regarding access to justice, social norms and practical barriers (such as inability to travel, illiteracy, not being included on relevant documents, etc.)

¹⁴ UNHCR, Syria Regional Refugee Response: Inter-agency Information Sharing Portal, available at [http://data.unhcr.org/syrianrefugees/country.php?id=122].

¹⁵ Al Jazeera America, 'I wasn't afraid, but now I am': Syrians fear Lebanon's visa rules, 5 January 2015, available at [http://america.aljazeera.com/articles/2015/1/5/syria-refugees-lebanon.html].

¹⁶ UNRWA, Profiling the vulnerabilities of Palestine refugees from Syria in Lebanon, 2015, p. 11, available at [http://www.unrwa.org/sites/default/files/final2_6_october_final_version_profiling_the_vulnerability_of_prs_in_lebanon_-_assessment.pdf].

¹⁷ As of 24 September 2015, the required funding for Lebanon's part of the Regional Refugee and Resilience Plan has only been 39% funded. See 2015 Regional Refugee and Resilience Plan: Funding snapshot as at 24 September 2015, available at [https://data.unhcr.org/syrianrefugees/download.php?id=9522].

¹⁸ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 1, available at [http://www.alnap.org/resource/21339].

¹⁹ UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: Running out of options, September 2015, available at [http://www.unrwa.org/sites/default/files/running_out_of_options_prs_in_lebanon.pdf].

²⁰ Inter-Agency Coordination Lebanon, Inter-Agency Update, Lebanon, October 2015, available at [http://data.unhcr.org/syrianrefugees/documents.php?page=1&view=grid&Language%5B%5D=1&Country%5B%5D=122].

a) Centrality of legal stay for refugees in Lebanon

Running in parallel to the suspension of refugee registration has been the introduction of restrictive regulations for entry and stay for Syrian nationals and PRS. The new regulations reflect the Government policy published in October 2014 with the stated goal of 'decreasing the number of displaced' on its territory by 'encouraging them to return to Syria or leave to other countries by all possible means'.²¹ Most of the regulations for renewal or regularisation of legal stay have not been published publicly and remain presented in a series of internal memoranda, some of which have been circulated to the national Protection Working Group by a representative of the Ministry of Social Affairs (MoSA).

The entry regulations, which formally came into force on 5 January 2015, amended existing Lebanese regulations and have effectively closed the borders for refugees - those seeking protection from armed conflict, violence or persecution.²² Since 5 January 2015, Syrian nationals wishing to enter Lebanon must disclose their purpose for entry and comply with the requirement of one of a number of categories which do not include a category for refugees who are fleeing conflict or persecution and seeking safety in Lebanon. Also, the new regulations for renewal or regularisation²³ of legal stay have resulted in many refugees being unable to renew their residency visas or regularise their legal stay in Lebanon.²⁴ The restrictive regulations put the refugee population already in Lebanon in a precarious and uncertain situation as many are not able to afford the related high costs; obtain all the complicated documents or find a Lebanese national to sign a pledge of responsibility (often known as a 'sponsor') in accordance with the relevant regulations. In addition to these requirements, the regulations are not always consistently interpreted by General Security Offices (GSOs) throughout the country. The burdensome, complex and costly regulations have resulted in approximately **53-70% of refugees from Syria currently living in Lebanon without valid legal stay.**²⁵ The situation is particularly difficult for **PRS, with 86% without valid legal stay,**²⁶ as the requirements for them are even more restrictive and complex than for Syrian refugees and regulations are often issued erratically and applied inconsistently.²⁷

With its links to accessing other rights and meeting needs, valid legal stay has proved to be crucial for refugees living in Lebanon. As the environment has become more restrictive for refugees, the pivotal nature of legal stay has become increasingly apparent as more and more refugees have not managed to obtain or maintain their legal stay. Not having the documentation required by Lebanese law can result in refugees being arrested, detained, facing criminal sanction, receiving departure orders or being deported.

²¹ The Council of Ministers General Secretariat, (24 October 2014), from the Minutes of the Council of Ministers meeting held on 25 April 2014 in Beirut. Available in Arabic at [<http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=6118>].

²² NRC and International Rescue Committee, Legal Status of Refugees from Syria: Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon, June 2015, page 6, available at [http://www.nrc.no/arch/_img/9202281.pdf].

²³ Regularisation is required to obtain legal stay for refugees who have either entered through (a) unofficial border crossings; or (b) official border crossings but have overstayed their residency visas.

²⁴ Amnesty International, Pushed to the Edge: Syrian Refugees Face Increased Restrictions in Lebanon, 2015, available at [<https://www.amnesty.org/en/documents/mde24/1785/2015/en/>].

²⁵ University of St. Joseph, Beirut, Survey on Perceptions of Syrian Refugees in Lebanon, 2015, page 12, available at [<https://data.unhcr.org/syrianrefugees/download.php?id=9399>]. The percentage of 53 is based on a correspondence with UNHCR Protection Official dated 24/03/2016.

²⁶ UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: In a state of uncertainty, September 2015, available at [http://www.unrwa.org/sites/default/files/in_state_of_uncertainty_prs_in_lebanon.pdf].

²⁷ Separate regulations for PRS to renew their residency visas are often only applicable for short periods of time and are not widely publicised. Coupled with inconsistent application of any regulations that do exist, NRC has noted from its fieldwork that it is extremely difficult for PRS to approach GSOs and then, if they manage to do so, to successfully renew their residency visas. The latest internal memorandum to renew or regularise residency visas for PRS is permitting PRS to renew or regularise until 31 March 2016.

In addition, without legal stay, it is particularly difficult for refugees to, amongst other things, move freely, obtain civil documentation (such as birth registration or marriage registration documents), work legally, secure adequate housing, access education or access justice mechanisms.²⁸ These are all aspects of life which are restricted for refugees and makes their situation more challenging, particularly when coupled with cuts in humanitarian funding,²⁹ another winter in Lebanon and more reluctance from host communities to continue welcoming refugees.³⁰

b) HLP rights for refugees in Lebanon

With the highest number of refugees per capita anywhere in the world,³¹ coupled with the Government's non-camp policy from the start of the crisis, shelter has been a challenge since refugees started seeking safety in Lebanon. Refugees should be able to uphold their right to adequate housing, including security of tenure³² while displaced but this has proved difficult in Lebanon. Initially, many refugees found shelter with members of the host community, especially where existing family or friendly relationships between refugee and host families existed. Humanitarian actors do provide shelter support to refugees from Syria but, given the number of refugees, limited funding and no Government-approved shelter to scale, this support is ultimately only provided to a minority of refugees and is often only for a fixed period of time. Consequently, there has been an increase in the number of informal tented settlements across Lebanon, where refugees rent land and often construct their own shelters on them.

These informal tented settlements do not meet minimum humanitarian standards³³ and due to the national and local authorities' reluctance to create any perceived permanent structures or sites, it has been particularly difficult to improve the standards of informal tented settlements.³⁴ Most refugees are paying rent for whatever type of shelter they have (unless provided with rent-free shelter, mainly through limited humanitarian assistance) which puts pressure on refugee families who, with more restrictions in Lebanon, are finding it increasingly difficult to work and earn money.³⁵

²⁸ See NRC, ICLA Programme reports on limited legal status, (1) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled, December 2013, (2) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South, April 2014; and (3) NRC and International Rescue Committee, Legal Status of Refugees from Syria: Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon, June 2015, all available at [http://www.nrc.no/lebanon#.VjT_SlfhCM8].

²⁹ Most significantly, due to lack of funding, food assistance for refugees in Lebanon has been gradually cut until it was halved to USD13.50 per eligible refugee per month in July 2015. See WFP, Forced to Make Deeper Cuts in Food Assistance For Syrian Refugees Due To Lack of Funding, 1 July 2015, available at [<https://www.wfp.org/news/news-release/wfp-forced-make-deeper-cuts-food-assistance-syrian-refugees-due-lack-funding>]. In addition, PRS have also been receiving less assistance with funding shortages faced by UNRWA. In May 2015, cash assistance to PRS was reduced to USD27 per eligible person per month and, in July 2015, cash assistance for housing was cut completely. See UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: Running out of options, September 2015, available at [http://www.unrwa.org/sites/default/files/running_out_of_options_prs_in_lebanon.pdf].

³⁰ University of St. Joseph, Beirut, Survey on Perceptions of Syrian Refugees in Lebanon, 2015, page 20, available at [<https://data.unhcr.org/syrianrefugees/download.php?id=9399>].

³¹ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 1, available at [<http://www.alnap.org/resource/21339>].

³² The Committee on Economic, Social and Cultural Rights has specified that adequate housing includes legal security of tenure, availability of services/infrastructure, affordability, habitability, accessibility, location (includes access to services and livelihoods) and cultural adequacy, General Comment 4, The Right to Adequate Housing, 13 December 1991, available at [<http://www.refworld.org/docid/47a7079a1.html>].

³³ The Sphere Handbook, Minimum standards in shelter, settlement and non-food items, available at [<http://www.spherehandbook.org/en/1-shelter-and-settlement/>].

³⁴ NRC, No Place to Call Home: How Syria's displaced millions struggle to keep a roof over their heads, June 2015, page 10, available at [http://www.nrc.no/arch/img.aspx?file_id=9199720].

³⁵ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 5, available at [<http://www.alnap.org/resource/21339>].

Lack of adequate housing for refugees in Lebanon also includes a lack of security of tenure which should include a guarantee of legal protection against the threat or experience of forced eviction.³⁶ As displacement has become prolonged in Lebanon, there have been increasing pressures between the host and refugee communities. This has been exacerbated by fluctuations in security, perceptions that the host community (especially vulnerable populations) are not being equitably assisted and a lack of will to continue hosting refugees, at national and local levels.³⁷ One consequence of this has been disputes between refugees and the host community, often in the context of landlord-tenant relationships. This has led to the threat of or actual forced evictions, often based on one or more of the following reasons: (a) financial reasons (often an inability of the refugee tenant to pay rent); (b) security reasons (often alleged by army, police or security services); or (c) community acceptance reasons (often connected to the perception that refugees are putting a strain on limited resources or no longer being welcomed at a local community level). According to recent figures, since the start of 2015, an estimated 18,000 refugees have been evicted and approximately 10,500 are at risk of eviction across the North, Bekaa and the South.³⁸

Where refugees live in Lebanon³⁹

- 59% live in finished buildings (usually apartments or houses that are above the minimum standards, although UNHCR found that 17% had unacceptable living conditions).
- 20% live in unfinished buildings or sub-standard buildings (houses, shops or garages that do not meet the minimum standards).
- 18% live in informal tented settlements (tents or structures that do not meet the minimum standards).
- 3% live in collective centres (usually large buildings housing over six refugee families).

Most refugees have to pay some form of rent for their housing and cost of utilities. Even where they do not have to pay rent, such as when receiving shelter assistance, this is usually only provided for a specific time period, usually 12- 18 months.

4. RELEVANT INTERNATIONAL AND NATIONAL LAW

a) Overview

Lebanon has a number of international and national legal obligations to protect the rights of persons on its territory. While international law can be especially difficult to enforce or apply to domestic remedies, it provides a useful benchmark and reflection of internationally agreed minimum standards for every person's rights and entitlements; as well as the responsibilities of states to guarantee these. From its research on displaced women's HLP rights, NRC has noted the frequent gap between law and practice which results in lack of application or enforcement of laws that do exist. There can be numerous reasons for this, including lack of capacity to deal with the number of claims; a breakdown in rule of law during conflict or crisis; challenges enforcing decisions; or lack of information about legal options available.⁴⁰

b) Lebanon's commitments under international human rights law

Despite Lebanon not being a signatory to the 1951 Refugee Convention, it is a signatory to the main international human rights treaties, including the following:⁴¹

- International Covenant on Civil and Political Rights (ICCPR);
- International Covenant on Economic, Social and Cultural Rights (ICESCR);
- International Covenant on the Elimination of All Forms of Discrimination against Women (CEDAW);
- International Convention on the Elimination of All Forms of Racial Discrimination (CERD);
- Convention on the Rights of the Child (CRC).

Lebanon has incorporated most of its human rights obligations, including the Universal Declaration of Human Rights (UDHR),⁴² into the Lebanese Constitution⁴³ which also sets out that 'The Government shall embody these principles in all areas without exception.'⁴⁴ In addition, according to the Lebanese Code of Civil Procedure, Lebanon's international obligation supersedes national law (although not constitutional law) if there is any conflict between the laws.⁴⁵

³⁶The UN Committee on Economic, Social and Cultural Rights stated that the concept of security of tenure should include that 'all persons should possess a degree of security of tenure which guarantees legal protection against forced eviction, harassment and other threats,' General Comment 4, The Right to Adequate Housing, 13 December 1991, available at [<http://www.refworld.org/docid/47a7079a1.html>].

³⁷University of St. Joseph, Beirut, Survey on Perceptions of Syrian Refugees in Lebanon, 2015, available at [<https://data.unhcr.org/syrianrefugees/download.php?id=9399>].

³⁸OCHA, Humanitarian Bulletin, Lebanon, Issue 13, 1 September – 15 October 2015, available at [http://reliefweb.int/sites/reliefweb.int/files/resources/Humanitarian%20Update%20-%20Issue%2013%20%281%20September%20-%202015%20October%202015%29_EN.pdf].

³⁹UNHCR, Shelter Survey, March 2015.

⁴⁰NRC, Life Can Change: Securing housing, land and property rights for displaced women, 2014, page 49, available at [womenshp.nrc.no].

⁴¹For a full list, see University of Minnesota, Human Rights Library, Ratification of International Human Rights Treaties – Lebanon, available at [<https://www1.umn.edu/humanrts/research/ratification-lebanon.html>].

⁴²The UDHR is not binding law but many provisions are reflected in other human rights law and some of the provisions are considered to be customary international law.

⁴³Adopted on 23 May 1926. English translation of the Lebanese Constitution (as amended), available at [<http://www.presidency.gov.lb/English/LebaneseSystem/Documents/Lebanese%20Constitution.pdf>].

⁴⁴Ibid, Part One, Preamble.

⁴⁵Article 2, Lebanese Code of Civil Procedure, Legislative Decree No. 90/83 (as amended), English translation of selected articles, available at [<http://www.stl-tsl.org/en/documents/relevant-law-and-case-law/applicable-law/2249-selected-articles-of-the-lebanese-code-of-civil-procedure>].

Consequently, Lebanon does have commitments to all persons on its territory including the human rights obligations it has under the international treaties to which it is a State Party. Concerning women's rights, the main aspects of international human rights law emphasise rights to equality and non-discrimination (see box below for details).

Lebanon's key commitments under international law - women's rights

Non-discrimination and equality

- Human rights law contains many references to non-discrimination which protect women's rights so that they are equal to those of men.⁴⁶
- According to CEDAW, there is an explicit provision that women have equality before the law, including in relation to contracts and administering property.⁴⁷

Right to seek asylum from persecution⁴⁸

- Relevant to Lebanon as a non-signatory to the 1951 Refugee Convention.
- Includes right to seek and enjoy in other countries asylum from persecution, although this is subject to conditions set out by national law.

Adequate standard of living⁴⁹

- Includes adequate housing which has been defined as:
 - legal security of tenure;
 - availability of services, materials, facilities, infrastructure;
 - affordability;
 - habitability;
 - accessibility;
 - location (includes access to services and livelihoods); and
 - cultural adequacy (allow for cultural identity).⁵⁰

Security of tenure

- Takes a variety of forms, including rental accommodation, cooperative housing, lease owner-occupation, emergency housing and informal settlements, including occupation of land or property.⁵¹
- According to the UN Committee on Economic, Social and Cultural Rights, 'all persons should possess a degree of security of tenure which guarantees legal protection against forced eviction, harassment and other threats.'⁵²
- Forced evictions are a breach of human rights and have been defined as 'the permanent or temporary removal against their will of individuals, families and/or communities from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection.'⁵³

Right to work⁵⁴

- Connected to the right to have an adequate standard of living with access to livelihoods.⁵⁵

c) Relevant national law

The main areas of HLP relevant for refugees in Lebanon relate to renting/leasing property, evictions, housing disputes and personal status aspects of real estate, such as inheritance and marital property.

i. Lease agreements and evictions

For leases and evictions, the main laws are the Code of Obligations and Contracts of 1932 and the Code of Civil procedure of 1933, which provide (a) for the conditions and necessary requirements to enter into a valid lease agreement; (b) the obligations of each party (the landlord and the tenant); (c) the consequences when obligations are not fulfilled; (d) the legal eviction procedure. More details on lease agreements and evictions in accordance with Lebanese law can be found in the NRC Factsheets.⁵⁶

ii. Housing disputes

For housing disputes, the relevant law depends on the reasons for the dispute. For instance, if a dispute is related to obligations under a lease agreement (whether written or verbal), the Code of Obligations and Contracts of 1932 would apply. If the parties involved are not able or not willing to approach the statutory or formal legal system to resolve a dispute, there are alternative methods of dispute resolution, such as those related to customary or traditional practices and dispute resolutions. In certain circumstances, the customary dispute resolution is the only option available to parties to a dispute. For instance, refugees from Syria are often reluctant or unable (due to lack of legal stay) to approach the statutory legal system and so customary dispute resolution is likely to be the only option available to resolve disputes.

⁴⁶For instance, Article 3 of the ICCPR and Article 1 of CEDAW.

⁴⁷Article 15 of CEDAW.

⁴⁸Article 14 of UDHR.

⁴⁹Article 11 of ICESCR.

⁵⁰Committee on Economic, Social and Cultural Rights, General Comment No. 4 on the Right to Adequate Housing, 1991.

⁵¹Committee on Economic, Social and Cultural Rights, General Comment No. 4 on the Right to Adequate Housing, 1991, paragraph 8(a).

⁵²Committee on Economic, Social and Cultural Rights, General Comment No. 4 on the Right to Adequate Housing, 1991, paragraph 8(a).

⁵³Committee on Economic, Social and Cultural Rights, General Comment No. 7 on the Right to Adequate Housing, 1997, paragraph 3.

⁵⁴Article 6 of ICESCR and Article 23 of UDHR.

⁵⁵Article 11 of ICESCR.

⁵⁶NRC, Factsheet on Lease Agreements, 2014 and the NRC, Factsheet on Eviction, 2014.

5. CHALLENGES FACED BY REFUGEES FROM THE PERSPECTIVE OF REFUGEE WOMEN

a) Changing gender roles in displacement

The need for women to work so as to bring in much needed income has resulted in significant changes in the gendered roles and norms for many Syrian families. Since arriving in Lebanon many women are finding themselves having to take on different roles and responsibilities as compared to when they lived in Syria. An assessment conducted by OXFAM and ABBAD showed that, Syrian women in Lebanon increasingly have to assume non-traditional roles including being the sole income earner. This is in addition to maintaining more traditional roles of cooking, cleaning and childcare.⁵⁷ The impact of displacement on the gendered roles and responsibilities of men have been equally significant.⁵⁸ Men who were once providers for their families now feel as though they are not able to provide for their families. Unable to fulfil the roles that they had prior to displacement, men from all focus group discussions reported in various ways that they felt they had failed their families. In addition, many male participants in focus group discussions expressed that while they knew that their wives and children would have to look for any sort of income, they were concerned about the possible risks, including women exposed to men that they do not know; or exposed to Lebanese women who the Syrian men felt have different values as compared to Syrian women. More than 90% of women who participated in focus group discussions reported that they were looking for employment. Few had been able to secure any form of long term employment, with most being able to obtain occasional work as cooks or cleaners. With the virtual impossibility of obtaining a permit to work legally, such work is low paying and irregular, and similar to experiences shared by men, many women reported being owed salaries by their employers. In addition to non-payment of salaries, women faced the additional risks of sexual exploitation and abuse including sexual harassment by employers.

b) Gender-based violence

For Syrian refugee women, assessments of the impact of the Syrian crisis indicate high levels of sexual and gender-based violence, with rape, assault, intimate partner violence and survival sex appearing increasingly common.⁵⁹ This is confirmed by humanitarian NGOs who suggest that as the economic situation becomes more dire (with few options to work, reduced humanitarian assistance and the cost of living remaining high) and the continued breakdown of family structures, little access to justice and impunity for perpetrators, sexual exploitation and abuse is on the rise, with female-headed households at greatest risk.⁶⁰

In focus group discussions with women in Tyre (South Lebanon), Mount Lebanon and in Qubayat (North Lebanon), the women were all in agreement that a woman who was experiencing violence from her husband would not be able to leave that relationship, either because of her children or because she would have nowhere to go.

“Some are obliged to tolerate their husband because they have no family who can help them”

Focus group discussion, Syrian women, Qubayat, North Lebanon.

“In case of divorce, women have to give up on their rights, for example if a woman has children and she is asking for divorce, she will have to give up on her children’s custody in order to get divorced.”

Focus group discussion, Syrian women, Tyre, South Lebanon.

Traditionally, Syrian women, after divorce would return to their families, to the home of their father. While this is not necessarily always a satisfactory alternative for women, it at least provides them with another option. In a situation of displacement, for the Syrian women in Lebanon, mostly separated from their families and their family’s homes, they are likely to have few options and often have to remain in a home where they may not be safe.

The lack of access to legal protection and remedies reinforces their existing economic and financial vulnerability and often without extended family homes to return to, means they will have no choice but to remain in abusive and violent relationships. Ensuring that Syrian women have access to legal mechanisms (whether statutory, customary or religious) is essential and must be linked to ensuring that adequate housing is available for them and their families.

c) Trying to maintain legal stay

Having limited legal status in Lebanon often has negative consequences on a refugee’s ability to access various rights, including rights to protection and assistance during displacement. As noted above in the section on Current context, the restrictive regulations, which were introduced in January 2015 as a culmination of an increasingly strict framework⁶¹ limiting the entry and ability of refugees to stay legally in Lebanon,⁶² have dramatically changed the situation for refugees in Lebanon.

Syrian nationals trying to renew their residency visas are divided into two distinct categories, either (1) registered with UNHCR; or (2) not registered. Each category has to present to the relevant GSO a number of onerous documents and pay the required fees.⁶³ NRC has observed discrepancies in the application of these regulations in different GSOs throughout Lebanon. It is often difficult to determine a consistent practice which makes it challenging to understand the requirements in order to be able to advise refugees and ensure they are able to decide whether or not to approach the GSO to renew their residency visas.

⁵⁷ ABAAD- Resource Center for Gender Equality and OXFAM GB, Shifting Sands: Changing gender roles among refugees in Lebanon, September 2013, available at [https://data.unhcr.org/syrianrefugees/partner.php?OrgId=147].

⁵⁸ ABAAD- Resource Center for Gender Equality and OXFAM GB, Shifting Sands: Changing gender roles among refugees in Lebanon, September 2013, page 14, available at [https://data.unhcr.org/syrianrefugees/partner.php?OrgId=147].

⁵⁹ SYRIA CRISIS - Dimensions of gender-based violence against Syrian refugees in Lebanon, Ghida Anani, Freedom of Movement Review 44, September 2013, available at [http://www.fmreview.org/detention/anani].

⁶⁰ Key informant interview with, International Rescue Committee, Lebanon; Key informant interview with Danish Refugee Council, Lebanon; ABAAD- Resource Center for Gender Equality and OXFAM GB, Shifting Sands: Changing gender roles among refugees in Lebanon, September 2013, available at [https://data.unhcr.org/syrianrefugees/partner.php?OrgId=147].

⁶¹ PRS started facing challenges entering Lebanon in the summer of 2013 and this became increasingly restrictive. For Syrian refugees, challenges started in May 2014 with their ability to cross the border becoming more difficult.

⁶² ‘Legally’ when used in this context refers to the position under Lebanese law and not under international law or humanitarian principles.

⁶³ These fees are usually USD200 per person 15 years’ old or over and the additional costs of obtaining other required documents which NRC has estimated costs approximately USD75 per adult to obtain when renewing legal stay as a UNHCR-registered refugee. The USD75 includes the cost to obtain a housing pledge, the pledge not to work, the copies of IDs and photographs. It excludes the cost of any lease agreement, transportation costs, the USD200 renewal fee and the cost of any additional documents required by specific GSOs.

i. Categories of renewing legal stay as refugees or 'non-refugees'

There is a clear link between legal stay and UNHCR registration as a refugee. Syrian nationals who try to renew their residency visas in the category as registered UNHCR refugees have to sign a pledge not to work for the duration of his/her residency in Lebanon. Working after signing this pledge puts the refugee at risk of criminal sanctions, which could include being deported to Syria. Syrian nationals who try to renew their residency visas as not-registered with UNHCR are required to secure a Lebanese national as a 'sponsor' to guarantee their stay in Lebanon, by signing a 'pledge of responsibility'.⁶⁴ In addition, there are separate regulations for PRS which are also very burdensome and very difficult and expensive for PRS to fulfil.

ii. Pledge of responsibility

NRC has noted from its fieldwork that many GSOs still require a pledge of responsibility, from a Lebanese sponsor, even when refugees try to renew their residency visa with their UNHCR registration document. This has been most often noted with males aged 18 – 59 as they are considered to be working and so, according to the GSO, unable to renew as a refugee and, therefore, sign a pledge not to work.⁶⁵ From NRC's case database, an average of only 20% of NRC ICLA beneficiaries are able to renew or regularise their residency visas based on a UNHCR registration document. In some areas in Lebanon, the average time to receive a decision from the relevant GSO about renewal or regularisation was five weeks.⁶⁶ As seen in the figures below, throughout Lebanon, NRC has documented that an average of 91% of refugees assisted by NRC have been unable to provide a pledge of responsibility when requested to do so by the GSO.

53-70% of Syrian refugees and 86% of PRS do not have valid legal stay

NRC's fieldwork confirms the data already provided that many refugees are simply unable to renew their residency visas, either because they are unable to fulfil the requirements, pay the fees or are just not attempting to approach GSO because of the identified challenges.

Information from NRC case database, September 2015

Bekaa Valley⁶⁷

- 69% of those interviewed (868) by NRC did not approach a GSO to renew or regularise their residency visas.
- 48% cannot provide all the necessary documentation, with 88% out of these not able to provide the pledge of responsibility.
- 37% lack financial means (USD200 fee per family member 15 years' old or over and related costs).
- Of those interviewed who did approach the GSO to renew or regularise, 50% wanted to ensure their freedom of movement and 20% wanted access to work.

South Lebanon⁶⁸

- 84% of those interviewed by NRC (216) did not approach the GSO to renew or regularise their residency visas.
- 50% cannot provide all the necessary documentation, with 96% out of these not able to provide the pledge of responsibility.
- 37% lack financial means.
- Of those interviewed who did approach the GSO to renew or regularise, 42% wanted to ensure their freedom of movement and 54% wanted access to work.

North Lebanon⁶⁹

- 69% of those interviewed by NRC (251) did not approach the GSO to renew or regularise their residency visas.
- 30% cannot provide all the necessary documentation, with 92% out of these not able to provide the pledge of responsibility.
- 37% lack financial means.
- Of those that did approach the GSO to renew their residency visa, 58% wanted to ensure their freedom of movement.

Beirut/Mount Lebanon⁷⁰

- 63% of those interviewed by NRC (147) did not approach the GSO to renew or regularise their residency visas.
- 49% cannot provide all the necessary documentation, with 88% out of these not able to provide the pledge of responsibility.
- 27% lack financial means.
- Of those that did approach the GSO to renew their residency visa, 35% wanted to avoid the risk of arrest, 20% wanted to ensure their freedom of movement, and 18% wanted access to work.

⁶⁴ There are different templates for the pledge of responsibility, including a pledge to acquire a work permit for the Syrian national. This does not automatically mean that the Syrian national may continue to work legally – there are other regulations for working in accordance with Lebanese law.

⁶⁵ NRC, Legal and Protection Context Update, South, August 2015 and NRC, Legal and Protection Context Update, Bekaa, September 2015.

⁶⁶ NRC, Legal and Protection Context Update, North, September 2015.

⁶⁷ NRC, Legal and Protection Context Update, Bekaa, September 2015.

⁶⁸ NRC, Legal and Protection Context Update, South, September 2015.

⁶⁹ NRC, Legal and Protection Context Update, North, September 2015.

⁷⁰ NRC, Legal and Protection Context Update, Beirut/Mount Lebanon, September 2015.

iii. Renewal as head of household

Renewal of residency visas for a family is based on the renewal of the head of household, which is defined primarily as the father or husband of a family. Women can be considered to be a head of the household if their husband or any son over the age of 18 is not present in country.⁷¹ However, they often have to provide evidence that their 'male head of family' is not present in Lebanon. For instance, NRC has observed that when a woman applies to renew or regularise residency visas for her family as the head of household she has to present proof from the local Mukhtar⁷² that she is living alone and all the children in the family are under 18 years' old. This is in addition to all the other documents required and fees payable.⁷³ NRC has noted that women have reported being turned away from some GSOs when presenting themselves as the head of household and trying to renew their individual or family's residency visas. In these circumstances it may be very difficult for a woman to have the necessary documents or provide the required evidence (as requested by the GSO and not included by law) to prove that she is the head of household.

As a woman's ability to obtain legal stay is connected to male family members, this makes it difficult for a woman to renew her own residency visa. Therefore, if the male head of household is unable to renew his residency visa for any reason, the women and children are also unable to renew. As a number of GSOs are not renewing residency visas based on UNHCR registration documents for males aged between 18-59, this results in their families also not being able to renew their residency visas as refugees.⁷⁴ If these families are able to find a Lebanese sponsor, which is very difficult, then they may be able to renew their residency visas if they can provide the other documents and pay the fees.

iv. Trying to obtain onerous documents

A number of the documents required to renew residency visas are difficult for refugees to obtain. NRC has noted that different GSOs often ask for different types of documents, interpreting the regulations on a local level. There are templates for some of the documents required which have to be prepared by a notary public before being presented to the GSO. Some of the most challenging documents are those listed below.

- **Housing pledge:** This document usually states that a Lebanese national hosts a Syrian household and commits to notify the local GSO when the occupancy ends. The person signing the housing pledge has to demonstrate his/her rights in the relevant property (e.g. ownership through a property deed or leasehold through a lease agreement) and the document has to be signed and stamped in front of the local Mukhtar. NRC has noted from its fieldwork that many GSOs have interpreted this to include a lease agreement between the refugee tenants and Lebanese landlord instead of or in addition to the evidence of the landlord's property rights. Some GSOs have also asked for specific information about the property, including setting minimum rents or a minimum number of rooms.⁷⁵

⁷¹ This is in accordance with the internal memorandum setting out the main regulations for Syrian national to renew or regularise residency visas. These regulations have not been published externally and were shared with the national Protection Working Group.

⁷² Locally elected leader within a community.

⁷³ NRC, Legal and Protection Context Update, South, September 2015.

⁷⁴ NRC has also noted that some Lebanese sponsors only provide a pledge of responsibility for the male head of household and not for the other family members, resulting in women and children being unable to renew their residency visas.

⁷⁵ NRC, Advocacy briefing, March 2015.

- **Residency statement:** This document is often required for refugees living in informal settlements or Palestinian refugee camps or gatherings. It is used instead of a housing pledge because there is often no proof of property rights by a Lebanese national in the homes, tents or other structures the refugees are renting. The statement is usually given by the local Mukhtar.

- **Pledge of responsibility:** This document is to be provided by a Lebanese national as a sponsor or guarantor of the refugee family. The extent of the responsibility taken by the Lebanese national is not clear but, from the template documents (mostly available at notary publics as the documents have to be signed and notarised), it seems that the sponsor has full liability for all costs of the refugee family. This makes it very difficult to obtain the document as Lebanese are understandably reluctant to provide such a guarantee with so much uncertainty about their resulting responsibilities. In addition, there have been numerous reports, including from NRC beneficiaries, of potential Lebanese sponsors requesting sums of money to complete the documentation. The sponsor has to sign the pledge in front of the Public Notary and then be present at the GSO to apply for the pledge of responsibility and also when the residency visa is collected.

- **Other documents (although not included in the regulations):** GSOs often ask for additional documents even where these have not been included in the residency renewal regulations. From NRC's fieldwork, such documents have included evidence of financial means while in Lebanon (such as bank account details, copies of money transfers received, or humanitarian assistance received). These documents have been used by GSOs to state that refugees, including women, must be working and, therefore, not entitled to renew their residency visas with a UNHCR registration document. Other documents that have been requested include proof of payment of municipality fees, a document from the Mukhtar stating the refugee's type of work, or a 'pledge to support' given by a Lebanese national who pledges to support the refugee family with food and money.⁷⁶

v. Potential for exploitation

The requirements to obtain documents from landlords, obtain the high fees, or a pledge of responsibility from a Lebanese national put refugees at risk of exploitation. Those who are in a position to provide such documents or pledges for refugees have a disproportionate amount of power in relation to the refugee. NRC has received reports that obtaining a pledge of responsibility from a Lebanese national can be very costly, with refugees, in some cases, having to pay up to USD200.⁷⁷ In addition, the complexity of the regulations and inconsistent application of them has meant refugees often do not know what documents and fees are necessary, leaving them open to exploitation, especially as a number of the required documents and photographs are being requested to be copied, signed and notarised in specific ways, resulting in those preparing such documents in a position of power over refugees who need such documents for trying to renew or regularise residency visas. The risks for women trying to obtain the necessary fees and documents are likely to be greater, increasing the potential for exploitation which has already been identified as a serious issue for women refugees in Lebanon,⁷⁸ as highlighted in the Gender-based violence section above.

⁷⁶ All observed by NRC field staff, including NRC lawyers who provide legal information and assistance for renewing or regularising residency visas. See NRC, Legal and Protection Context Update, North, September 2015.

⁷⁷ NRC, Legal and Protection Context Update, South, August 2015.

⁷⁸ For example, see International Centre for Migration Policy Development, Desperation leaves Syrian refugees open to exploitation, 6 July 2015, available at [http://www.icmpd.org/News-Detail.1668.0.html?&cHash=a0665e6ff8&tx_ttnews%5Btt_news%5D=298]; The Daily Star, Syrian refugee women face sexual exploitation, 1 August 2014, available at [<http://www.dailystar.com.lb/News/Middle-East/2014/Aug-01/265703-syrian-refugee-women-face-sexual-exploitation.ashx>]; or Human Rights Watch, Women Refugees From Syria Harassed, Exploited, 26 November 2013, available at [<https://www.hrw.org/news/2013/11/26/lebanon-women-refugees-syria-harassed-exploited>].

vi. Freedom of movement

Lack of legal stay has always had a significant effect on freedom of movement for refugees.⁷⁹ With the more restrictive environment for refugees and challenges maintaining legal stay, refugees continue to face limited freedom of movement, with reports of monitoring of legal stay and GSO spot-checks,⁸⁰ ongoing curfews,⁸¹ raids,⁸² arrests and detention of those without legal stay.⁸³ In some cases reported, refugees found with expired residency visas have had their documents confiscated (ID and residency visa) and then been requested to present themselves at the GSO within 24 hours, where they are then requested to regularise their residency visas within a specified time period (often 10 days).⁸⁴ PRS and Syrian refugees living in Palestinian refugee camps which have a military checkpoint at the entrance face additional difficulties when trying to enter the camps where they live, work or to seek medical assistance (as hospitals and clinics for PRS are often located in camps).

NRC fieldwork continues to support the findings that refugees, fearing arrest or detention because of not having legal stay, are limiting their movements. This has consequent effects on access to work, services (such as healthcare, education, food) and assistance.⁸⁵ In addition, findings from focus group discussions supported previous NRC research that women and children without legal stay are perceived to be less likely to be arrested or detained if stopped at a checkpoint, resulting in women and children being relied on to move because men without legal stay are considered to be at more risk of arrest or detention.⁸⁶

d) Housing, land and property issues

The main HLP issues faced by refugees from Syria include finding adequate housing, having security of tenure (not facing the risk of forced evictions), addressing housing disputes and managing any property as a result of inheritance or divorce. There is also a significant link with maintaining legal stay because, as noted above, evidence of housing (mainly in the form of a housing pledge or residency statement) is required for renewal or regularisation of residency visas. In addition, for refugees who have to sign a pledge not to work, not being able to earn a regular income through legal work results in challenges paying rent, which in the shelter context of Lebanon is necessary for the majority of refugees.⁸⁷

⁷⁹ See NRC, ICLA Programme reports on limited legal status, (1) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled, December 2013, (2) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South, April 2014; and (3) NRC and International Rescue Committee, Legal Status of Refugees from Syria: Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon, June 2015, all available at [http://www.nrc.no/lebanon#.VjT_SLfCM8].

⁸⁰ NRC, Legal and Protection Context Update, South, August 2015.

⁸¹ NRC, Legal and Protection Context Update, South, September 2015.

⁸² Amnesty International, Pushed to the Edge: Syrian Refugees Face Increased Restrictions in Lebanon, 2015, page 19, available at [https://www.amnesty.org/en/documents/mde24/1785/2015/en/].

⁸³ NRC, Legal and Protection Context Update, North, September 2015.

⁸⁴ For example, see NRC, Legal and Protection Context Update, South, August 2015.

⁸⁵ NRC, Legal and Protection Context Update, North, September 2015.

⁸⁶ See NRC, ICLA Programme reports on limited legal status, (1) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in Aarsal and Wadi Khaled, December 2013, (2) The Consequences of Limited Legal Status for Syrian Refugees in Lebanon: NRC Field Assessment in North, Bekaa and the South, April 2014; and (3) NRC and International Rescue Committee, Legal Status of Refugees from Syria: Challenges and Consequences of Maintaining Legal Stay in Beirut and Mount Lebanon, June 2015, all available at [http://www.nrc.no/lebanon#.VjT_SLfCM8].

⁸⁷ At least 81% of Syrian refugees have to pay rent. See. Amnesty International, Pushed to the Edge: Syrian Refugees Face Increased Restrictions in Lebanon, 2015, page 22, available at [https://www.amnesty.org/en/documents/mde24/1785/2015/en/].

i. Lack of adequate housing

UNHCR's shelter survey carried out early in 2015 found that 55% of refugees live in substandard and insecure shelter, such as informal settlements, unfinished buildings, overcrowded apartments or other substandard housing.⁸⁸ This is an increase from the surveys conducted in the previous two years (40% in 2014 and 31.5% in 2013)⁸⁹ and reflects the increasingly difficult situation for refugees in Lebanon. An increase in the number of informal tented settlements reflects the challenges that refugees have faced renting other types of housing. There has been an increase in smaller informal tented settlements in response to the numerous forced evictions of larger informal tented settlements.⁹⁰

ii. Forced evictions⁹¹

When families fail to pay their rent, as many do, they inevitably face the threat and then the reality of eviction, homelessness and the process of trying to find somewhere else to live. In most of the focus group discussions and interviews held by NRC, most refugee participants were concerned about the prospect of eviction as highlighted by the comments in the box below.

"I am in debt because of the rent. I received a notice of eviction, if I do not pay within one week, the landlord will evict me. I will have to move all my stuff and search for another accommodation."

"We failed to pay the rent for one month, we weren't threatened with eviction yet but we have been warned that if we don't pay soon they will threaten us with eviction."

"The landlord is always asking for the rent, he doesn't wait or give us extra time, He threatens us of eviction all the time if we don't pay him on time, also if we don't buy our groceries from his supermarket who's contracted with the United Nations World Food Programme. Knowing that, he increases the normal prices, so items at his store are more expensive than another store."

Focus group discussions, Syrian women in Tyre (South Lebanon) and Qubayat (North Lebanon), November 2014.

⁸⁸ UNHCR, Syrian refugees in Lebanon: Quarterly snapshot, January – March 2015, available at [https://data.unhcr.org/syrianrefugees/download.php?id=8804].

⁸⁹ UNHCR, Shelter survey, March 2015.

⁹⁰ Inter-Agency Coordination Lebanon, Shelter Sector, Mid-Year Dashboard, June 2015, available at [http://data.unhcr.org/syrianrefugees/documents.php?page=8&view=grid&Language%5B%5D=1&Country%5B%5D=122].

⁹¹ Forced evictions refer to those evictions which are not conducted in accordance with Lebanese law. This can include carrying out evictions in breach of the obligations of a lease agreement or not in accordance with the necessary procedures, such as giving appropriate notice.

The predominant reason for facing eviction is the inability to pay rent which has been exacerbated by the cuts in humanitarian assistance,⁹² severe restrictions to earning income, the cost and complexities of obtaining or maintaining legal stay and rising debt.⁹³ In addition, from NRC's fieldwork, the other main reasons for the threat of or actual eviction are based on assertions of security reasons (often by the armed forces, police or other security agencies) or for reasons of lack of community acceptance.⁹⁴

The impact on families of living with the threat of eviction was highlighted by the focus group discussions and in-depth interviews conducted with women. Many thought that women were emotionally and mentally affected by their situation because they are always thinking about how to pay the rent, how to pay for food and how to fulfil the needs of their family.

Case study

An in-depth interview with Y who lives in the Bourj Hammoud area of Beirut with her husband and two children, highlights some of the particular challenges for women in this situation.

Her husband had lost his job in Lebanon after travelling to Syria when some of his family members had been killed.

He was not able to pay the rent for three months and now only has a temporary part-time job in a shoe shop and does not earn enough to pay the rent so they were well behind with their rent payments.

Y said that she had been threatened by the landlord who told her that if they did not pay by a certain day, they would have to leave the house. Y's daughters were with her and asked their mother where they would go if they left the house.

Y said that she does not have any contact with the neighbours and does not do the shopping. She takes care of the house and the children. Her husband said that he was the man and it was for him to provide for his family –

he would not want his wife to work and also worried about harassment as Y was already being verbally harassed by a man in the street below.

iii. Inability to pay rent

Refugees' inability to pay rent or tendency to resort to negative coping mechanisms to pay rent has been noted by NRC⁹⁵ as well as research by other agencies.⁹⁶ The Survival Minimum Expenditure Basket (SMEB), the minimum amount of spending for a refugee household (USD435 per average family of five), as calculated by the Lebanon Cash Working Group, has determined that the main expenditure for refugee families is on food, rent and healthcare. The latest Vulnerability Assessment for Syrian Refugees (VASyR) found that 52% of Syrian refugee households' income was below the SMEB.⁹⁷ A similar survey conducted by UNRWA for PRS found that 98% relied on UNRWA cash assistance as their main source of income.⁹⁸ This situation is likely to worsen for all refugees given the cuts in humanitarian assistance, the recent increased costs of renewal of legal stay (which are not included in the SMEB) and the challenges related to working. Recent analysis about levels of vulnerability of Syrian refugees and legal stay showed that refugee families without legal stay had a high level of socio-economic vulnerability.⁹⁹

Coping strategies for paying rent include borrowing money, exhausting savings, selling possessions, child labour, sharing housing with more families or restricting food consumption. 89% of Syrian refugee households and 78% of PRS households are in debt in order to survive in Lebanon.¹⁰⁰

The refugees NRC interviewed individually and in focus groups almost all named the struggle to pay rent as their biggest concern. In a situation where there are extremely limited income-generating opportunities for refugees, rental prices are high and there is ever-growing family debt, refugees are struggling to afford to pay their rent and, therefore, live with the ongoing threat of eviction. The risks for women, particularly female-headed households to be able to pay their rent is an extreme pressure on them, leaving the potential for exploitation and negative coping strategies.

"My husband died and I don't have any income, I rely on others to pay the rent."

Focus Group Discussion, Syrian refugee women, Tyre, 20 November 2014.

"People don't help you or lend you money, they see that I'm a female by myself with a baby and no fixed income, so they don't trust me; they directly assume that I will not pay them back."

Syrian woman, caring for her children alone after her husband disappeared three years ago. Interviewed in November 2014.

⁹² WFP, Impacts of e-card ration reductions on Syrian refugees in Lebanon, June 2015, available at [http://foodsecuritycluster.net/document/impact-e-card-ration-reductions-syrian-refugees-lebanon].

⁹³ NRC, No Place to Call Home: How Syria's displaced millions struggle to keep a roof over their heads, June 2015, pages 6-7, available at [http://www.nrc.no/arch/img.aspx?file_id=9199720].

⁹⁴ For instance, in September 2015, NRC observed ongoing threats of eviction due to lack of community acceptance, with reasons given including noise disturbance from refugees, increase in garbage and smell from littering and trespassing into privately owned fields. In one case, a Lebanese owner of agricultural land filed a complaint to the Public Prosecutor against neighbouring Syrian refugee tenants citing trespass onto his property and prostitution. NRC Lebanon, Legal and Protection Context Update, North, September 2015.

⁹⁵ NRC, Evaluation of the NRC's Lebanon Host Community Shelter Programmes, 2015, page 19, available at [http://www.nrc.no/arch_img/9197506.pdf].

⁹⁶ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 4, available at [http://www.alnap.org/resource/21339].

⁹⁷ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 4, available at [http://www.alnap.org/resource/21339].

⁹⁸ UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: Running out of options, September 2015, available at [http://www.unrwa.org/sites/default/files/running_out_of_options_prs_in_lebanon.pdf].

⁹⁹ Inter-Agency Coordination, Lebanon, Presentation on Household Visits: Protection Indicators, Residency Status, 27 August 2015, available at [http://data.unhcr.org/syrianrefugees/documents.php?page=5&view=grid&Language%5B%5D=1&Country%5B%5D=122].

¹⁰⁰ WFP, Vulnerability Assessment of Syrian Refugees (VASyR) in Lebanon: Executive Summary, 2015, page 9, available at [http://www.alnap.org/resource/21339]; and UNRWA, Profiling the vulnerability of Palestine refugees from Syria living in Lebanon: Running out of options, September 2015, available at [http://www.unrwa.org/sites/default/files/running_out_of_options_prs_in_lebanon.pdf].

iv. Lack of written lease agreements

Many refugee families, as tenants, do not have written lease agreements and are often not sure about the details of any verbal agreement they may have with their landlord. Refugees are often unaware of the benefits of written agreements or may be afraid of asking for agreements from their landlord or informal refugee representative (these mainly exist in informal tented settlements and are known as a Shaweesh).¹⁰¹ NRC has also noted from its fieldwork that there is often a dependence on the Shaweesh to enter into any lease agreement and there is often no individual recognition of each tenant.¹⁰² This can make it challenging for an individual family's benefit of protection under the agreement, for instance if there is any threat of eviction.

When an agreement exists, women's names are rarely included if written or involved in understanding any verbal agreement. In previous NRC research, refugee women have reported not being consulted when the male head of household made decisions about the family's shelter. Women reported not being part of any decision about the shelter although believing that their family's housing affected them and was important to their family's overall safety and stability.¹⁰³ This corresponds to the situation for women in Syria who would not usually have property registered in their name. Property tended to be registered in the name of a woman's father or, if married, her husband.¹⁰⁴ Not including women in agreements can make it difficult to protect the woman and possibly the children's rights under any agreement.

In cases where refugees are provided with humanitarian shelter assistance, there is an opportunity for women to be included in any agreements entered into on behalf of the refugee family. Humanitarian actors often continue to only include the male head of household as the representative of a family and will only use his name in any agreements or even only include him in discussions about the family's situation.

If women are to have security of tenure, they need to hold equal legal standing on agreements related to the family's shelter (such as a lease agreements). As joint tenants they will retain their security of tenure under the lease even if their husband leaves or is excluded from the home. If they are not included, it is at the very best uncertain what the legal status of women would be and could place them at greater risk of eviction. Women in the focus group discussions overwhelmingly felt that they should be named on the agreements with their husbands and it seems evident that it is good practice to name them as joint tenants. The men in the focus group discussions said they would not object if that were the policy of a humanitarian organisation providing or assisting in securing accommodation. By including women, they should then (a) have the same security of tenure as their husbands/other male relatives; (b) have the same rights under the tenancy; and (c) be able to enforce those rights in case of any dispute. This should be the case in any event, but is particularly important for women who have been abandoned by their husbands, are widowed or are experiencing domestic violence to ensure that they can remain in their homes if they choose to.

¹⁰¹ NRC, Increasing Security of Tenure through Relationship Building and Written Lease Agreements: An Assessment of NRC's Housing, Land and Property Rights Pilot Project in Lebanon, August 2014, page 8, available at [http://www.nrc.no/arch/_img/9195238.pdf].

¹⁰² NRC Lebanon, Legal and Protection Context Update, North, September 2015.

¹⁰³ NRC, Increasing Security of Tenure through Relationship Building and Written Lease Agreements: An Assessment of NRC's Housing, Land and Property Rights Pilot Project in Lebanon, August 2014, page 28, available at [http://www.nrc.no/arch/_img/9195238.pdf].

¹⁰⁴ ABAAD- Resource Center for Gender Equality and OXFAM GB, Shifting Sands: Changing gender roles among refugees in Lebanon, September 2013, page 25, available at [<https://data.unhcr.org/syrianrefugees/partner.php?OrgId=147>].

Benefit of written lease agreements for refugees as tenants¹⁰⁵

From an initial pilot project and subsequent fieldwork, NRC Lebanon has found that using a written lease agreement is an effective way of increasing security of tenure for refugees in Lebanon. Set out below are some of the benefits of a written lease agreement. Although not as strong, a verbal agreement is also preferable to no agreement and can also provide some of the benefits below.¹⁰⁶

- Provide documentation of a refugee's housing situation.
- Clarifies the obligation of the refugee family as tenant and the landlord – each has information about their role regarding the housing.
- Reduces misunderstandings between tenant and landlord.
- Provides protection under the law for tenant and landlord.
- Can be useful in case of any dispute between the tenant and landlord.
- Manages expectations of tenant and landlord – they can know what to expect from each other.
- Reduces the chance of exploitation – e.g. landlord requiring tenant to work in addition to paying rent.
- Increases transparency and provides positive and more equal basis for relationship between landlord and tenant.

¹⁰⁵ For more information about lease agreements, see the NRC Factsheet, NRC Lebanon, Lease Agreement Factsheet, 2014.

¹⁰⁶ NRC, Increasing Security of Tenure through Relationship Building and Written Lease Agreements: An Assessment of NRC's Housing, Land and Property Rights Pilot Project in Lebanon, August 2014, pages 15-16, available at [http://www.nrc.no/arch/_img/9195238.pdf].

6. CONCLUSION

While lack of legal stay in itself continues to have a significant impact on access to many rights for refugees in Lebanon, it is also apparent that many of the challenges faced by refugees are linked and together create the desperate situation that looks set to continue if the restrictive environment remains. Having a holistic overview is important to be able to understand these links and consider how to approach them when intervening as the humanitarian and development communities. This overview should also be considered separately from the perspectives of men, women and children who all experience displacement in specific ways. The focus on women allows insight into the impact of coping mechanisms on them and their perception of the effects of such challenges on their family. The findings presented in this briefing reflect the current reality for refugees and confirm the findings that the restrictive environment preventing refugees from working and moving freely together with cuts in humanitarian funding is leaving refugees with few and difficult options.

Given the protracted displacement and the number of refugees in Lebanon, addressing limited legal status and the lack of adequate housing for refugees remain top priorities. Without being able to work according to the law or maintain legal stay, refugees are not managing to survive without resorting to negative coping mechanisms which, as resources tighten, are only likely to worsen. With the risk of exploitation particularly serious, including for women, addressing the reasons for this and similar challenges remains a critical step. Understanding and monitoring the measures taken by refugees and the reasons for these will continue to be important for any interventions to support refugees positively.

When developing programming, understanding the perspective and context for women in situations of crisis, conflict or displacement is an excellent opportunity for humanitarian and development actors to redress inequalities as part of their interventions. At a minimum, such inequalities should not be exacerbated by any intervention. Taking the time to assess and analyse the context for women prior to the crisis is also important to understand the dynamics and cultural aspects of the populations affected. Overall, interaction and participation with community members, both male and female, is essential to ensure relevance and appropriateness of any response. In order to ensure the formulation of appropriate and timely responses to the on going crisis in Lebanon, all actors should come together with the Government to address the harsh and unnecessary reality for refugees and try to stop the situation becoming even worse.

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