



POSITION PAPER

November, 2020

UNITED NATIONS IN LEBANON



SOCIAL PROTECTION IN LEBANON

BRIDGING THE IMMEDIATE RESPONSE WITH LONG-TERM PRIORITIES

Prepared by: **UNICEF** and **ILO** under the **UN Joint Programme on Social Protection** and **Beyond Group**



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SOCIAL PROTECTION IN LEBANON: BRIDGING THE IMMEDIATE RESPONSE WITH LONG-TERM PRIORITIES

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Prepared by **UN agencies** participating in the UN Joint Programme on Social Protection in Lebanon and **Beyond Group** on behalf of the **UN Country Team**

Since the Beirut Port explosion in August 2020 the social protection debate has been focused on the immediate and short-term response. Building on ongoing efforts for the development of a national social protection strategy for Lebanon, it is important to align the emergency response with medium term priorities and a longer-term vision for the sector. This paper serves to complement the Reform, Recovery and Reconstruction Framework (3RF)¹. It draws on the findings of various assessments in the social protection sector, providing concrete recommendations for an integrated crisis response which paves the way for an effective recovery, and linking immediate and short term measures with a longer term perspective for the development of a comprehensive social protection system in Lebanon.

AN IMMEDIATE SOCIAL PROTECTION RESPONSE IN TIMES OF CRISIS

With a death toll of more than 200 people, more than 6000 injuries, and the displacement of roughly 300,000 residents, the Beirut Port explosion on August 4th has instigated a humanitarian crisis with significant immediate and long-term ramifications. Numerous urgent needs have surfaced among Beirut residents affected by the explosion, namely: access to alternative housing, healthcare, education, food security, welfare services, legal aid, as well as compensation for heightened income insecurity caused by lost economic activity, erosion of livelihood opportunities, and the lack of appropriate systems for social security. This comes in addition to the impact of previous overlapping crises that have compounded the socio-economic vulnerabilities of residents in Lebanon.



Against the backdrop of these pressing needs, there are also longer-term, forward-looking imperatives to take into consideration: rehabilitation of homes, restoration of public infrastructure and basic services, in addition to broader economic recovery, reconstruction, and stabilization efforts. Thus, the response to the current crisis necessitates a two-fold approach:

- 1** Immediate interventions that provide relief and alleviate the hardship of affected Beirut residents.
- 2** Structural initiatives that enable systemic change and a sustained recovery for the long term.

This policy brief draws from an extensive year-long process – facilitated by Beyond Group, UNICEF, and the ILO – of collecting data, mapping the institutions, programs and instruments, and facilitating consultations with governmental and non-governmental stakeholders for the purpose of developing the National Social Protection Strategy². The brief sheds light on the multifaceted vulnerabilities and risks residents are exposed to as well as the emerging social protection needs and priorities for Beirut residents in particular, and Lebanon in general. It concludes with policy recommendations for immediate social protection measures as a response to the Beirut blast, as well as programmatic interventions and longer-term institutional reforms that pave the way for developing a comprehensive national social protection system. Finally, we propose a model for an institutional mechanism that is mandated with the design, decision-making, and implementation of social protection benefits that can ensure higher inclusion, participation and transparency within the current context.

THE NEED FOR AN IMMEDIATE SOCIAL PROTECTION RESPONSE FOR BEIRUT RESIDENTS

ACKNOWLEDGING THE HUMAN RIGHT OF ALL PEOPLE ON A STATE'S TERRITORY TO SOCIAL PROTECTION³, THE CORE SUBJECT OF THIS POLICY BRIEF IS TO EXAMINE THE FOLLOWING:

What **IMMEDIATE SOCIAL PROTECTION MEASURES** should be in place to **diminish the devastating implications of the explosion on the most vulnerable groups** residing in Beirut?

What **MEDIUM- AND LONG-TERM SOCIAL PROTECTION REFORMS** should be in place to **enable government to develop a sustainable social protection framework** that will, in turn, enable it to respond to any crisis?

What **INSTITUTIONAL MECHANISMS** should be in place for the **design, decision-making, and implementation of social protection benefits** in the immediate and long-term?

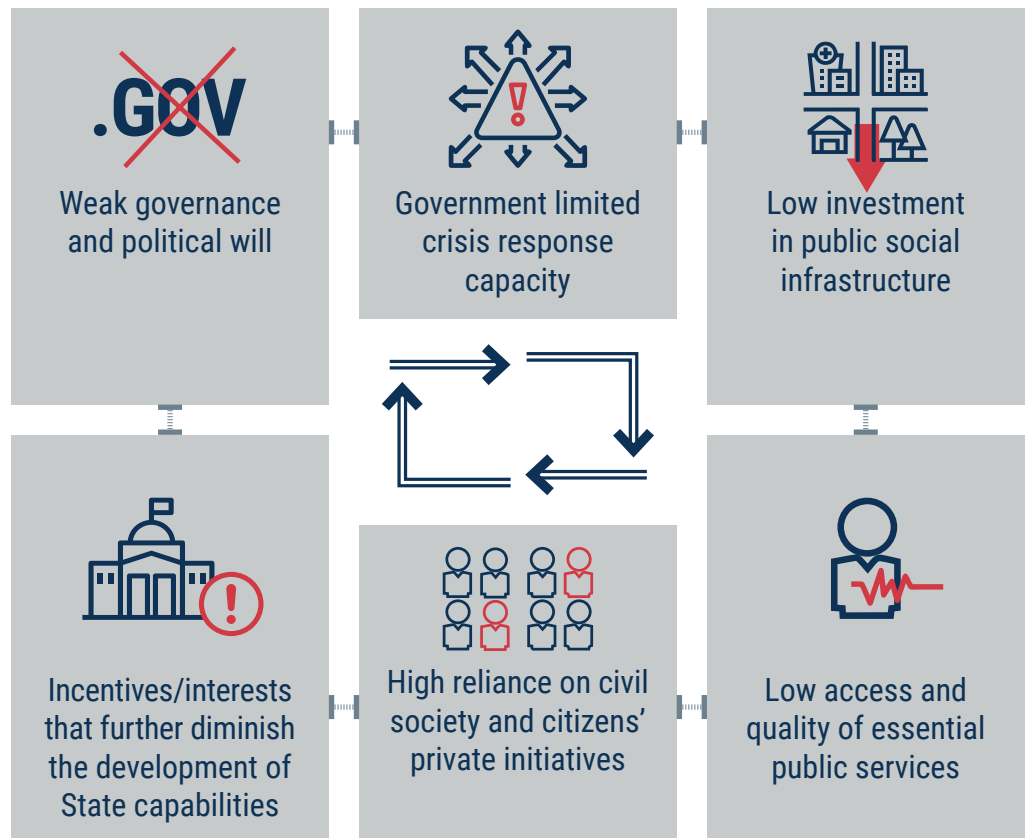
Those policy questions arise from the competing claims that any intervention in response to the current crisis should strengthen the government's frail capacity to act as a "welfare state" while simultaneously capitalizing on citizens' solidarity and engaging relevant stakeholders.

Here it is worth noting that the devastating impact of the explosion adds to an already difficult context, as the country grapples with a severe financial and economic crisis, the COVID-19 pandemic, a political impasse, and widespread civil unrest. Updated forecasts reveal the multi-faceted nature of the crisis in Lebanon in the aftermath of the explosion, where Lebanon's GDP is expected to contract by 24% in 2020⁴, suggesting a far deeper recession than previously projected by the IMF (12% decline⁵) before the blast, in addition to a currency crisis and rapid inflation (120% CPI increase from August 2019-August 2020⁶) with skyrocketing poverty rates estimated between 45% and 55% to date⁷. Before the blast, food security concerns had also been increasing in light of surging food prices – with 62% of the Lebanese, 78% of Syrian refugees, and 76% of Palestinian refugees having negative coping mechanisms that significantly increase the risks of malnutrition⁸– and the Blast has only exacerbated pre-existing challenges. These rapidly declining indicators point to the severity of the socio-economic situation in Lebanon, as vulnerable groups are subject to higher levels of deprivation and the erosion of the middle class threatens to place more citizens at risk.

The convergence of all the above-mentioned crises stems from deeply rooted structural and institutional limitations. First, the government has very limited crisis response capacity, as ministries/public agencies lack the material and/or human resources to be agile, efficient, and transparent and thus fall short in their roles either as coordinators or direct providers of relief services. Currently, the Forward Emergency Room of the Lebanese Army (غرفة الطوارئ المتقدمة) (للجيش اللبناني) constitutes the government-led focal point for the consolidation and coordination of the response to the crisis, in conjunction with the Higher Relief Council and concerned ministries. However, trust in government remains notably low, with a stark majority of humanitarian efforts relying on informal networks of social solidarity and concerted efforts from civil society.

This longstanding dichotomy between the public sector and civil society organizations perpetuates a self-fulfilling cycle within the political economy of Lebanon: Weak governance of social services provision - characterized by corrupt practices, the lack of effective coordination and the absence of a comprehensive legal/policy framework - together with lacking political will for social policy reform drive low investment in public social infrastructure, which in turn leaves the government with limited capacity to deliver, compromises the quality of essential public services, and reduces the state capability to address vulnerabilities and respond to crises. In this context, civil society becomes obliged to fill in the gaps left by the state and to assume its role in responding to basic needs. This creates a set of incentives and interests that further diminish the margin of development of state capabilities.

THE VICIOUS CYCLE WITHIN LEBANON'S POLITICAL ECONOMY



As such, any immediate measures proposed to respond to current needs should align with a sustainable, long-term, comprehensive framework for social policy in general and social protection in particular, noting that such a framework should put state responsibilities and the development of state capabilities at the center and clearly outline the role of other concerned stakeholders (notably the private sector/employers).

The challenge remains in the financing of the short-term response and longer-term sustainable framework. There is an increasing need to analyze and identify fiscal space for social protection given the dire socio-economic conditions and the ensuing vulnerabilities they imply. With that said, it is worth noting that the pledges of the international community should be spent efficiently according to the immediate measures for responding to the blast and should also be complemented with government financing through short term reallocation and longer-term fiscal reform.

CORE FUNCTIONS OF SOCIAL PROTECTION

THE COMPONENTS OF AN INTEGRATED AND INCLUSIVE SOCIAL PROTECTION FRAMEWORK

WHILE THERE ARE MULTIPLE DEFINITIONS FOR SOCIAL PROTECTION, ALL CONVERGE FOR THE SAME SOCIAL PROTECTION FUNCTIONS WHICH ARE THE FOLLOWING:



1. PROTECT

Protect vulnerable population guaranteeing relief from poverty and deprivation



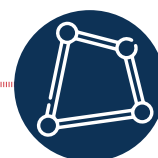
2. PREVENT

Prevent deprivation in various ways; support shock management



3. PROMOTE

Promote the enhancement of real income and capabilities



4. TRANSFORM

Transform imbalances in society that encourage, create, and sustain vulnerabilities

PRINCIPLES FOR DEVELOPING A SOCIAL PROTECTION FRAMEWORK FOR LEBANON

Building on previous consultations with governmental and non-governmental stakeholders, the following set of guiding principles have been identified for developing a social protection framework for Lebanon:



RIGHTS-BASED:

Social protection should support commitment to and maintenance of human rights as stipulated in national and international legal instruments.



SOCIAL JUSTICE:

The social protection system should provide an adequate level of benefits which address the large economic and social differences between individuals and families by ensuring equal opportunities to all.



INCLUSIVENESS:

The social protection system should be committed to the realization of universal coverage of all individuals, leaving no one behind. It should take all diversity of needs and risks into consideration and work to support the various marginalized groups in engaging in society by means of a set of social guarantees devoted to their needs.



GOOD GOVERNANCE:

The social protection system should be based on a set of rules, controls, mechanisms and procedures that govern the state administration efficiently and effectively and ensure flexibility of application. This includes coordinating the efforts of ministries and public institutions, establishing clarity of roles among them, and strengthening the capacities of oversight and accountability.



SUSTAINABILITY:

The social protection system should focus on meeting the needs of the present generation without undermining the ability to meet the needs of future generations, through stable financing, institutionalized administrative mechanisms, and efficient human resources.



PARTICIPATORY:

The government is the custodian of the national framework for social protection and should secure overall leadership for it by setting strategic direction and facilitating coordination and commitment by all concerned actors. The framework also accounts for institutionalized participation and support from a wide range of national actors, including civil society.



SOCIAL SOLIDARITY:

Everyone should cooperate and benefit cooperatively from the social protection system, which promotes solidarity, interdependence and a national feeling of ownership.



COMPLIANCE WITH (AND COMMITMENT TO) THE LEGAL FRAMEWORK:

The state is responsible for enforcing the law and assumes accountability in this regard.



EMPOWERMENT:

The social protection system should empower and include marginalized groups, promote efficient labor markets, develop human skills, enhance productive capacities, and enable redistribution in society.

By adopting the above principles, the social protection framework should align with the 2030 Agenda for Sustainable Development, and in particular to the SDG target 1.3 that gives mandate to “implement nationally appropriate social protection systems and measures for all, including floors.” The Social Protection Floor framework should orient the development of a nationally defined and inclusive social protection system in Lebanon, with the objective of closing social protection gaps and progressively achieving universal coverage.

According to ILO Recommendation No. 202, national social protection floors should comprise at least the following four social security guarantees, as defined at the national level:

- Access to essential health care, including maternity care.
- Basic income security for children, providing access to nutrition, education, care and any other necessary goods and services.
- Basic income security for persons in active age who are unable to earn sufficient income, in particular in cases of sickness, unemployment, maternity and disability.
- Basic income security for older persons.

PILLARS OF SOCIAL PROTECTION

In order to realize a comprehensive and integrated system for social protection in Lebanon, we distinguish between five complementary and interconnected pillars of social protection:



SOCIAL ASSISTANCE:

Non-contributory social protection which consists of cash, near-cash and in-kind transfers, and subsidies.

INSTRUMENTS

- Cash transfers
- In-kind transfers
- Subsidies



FINANCIAL ACCESS TO SOCIAL SERVICES (HEALTH & EDUCATION):

Social protection which is concerned with addressing cost barriers to the receipt of care, including user fees, out-of-pocket (OOP) payments, or other associated costs.

INSTRUMENTS

- Financial access to healthcare (fee waivers, etc.)
- Health insurance
- Financial access to education



SOCIAL WELFARE:

Non-contributory social protection which includes service interventions as well as the various outreach, case management and referral services that can support the complex needs of families. It also includes the development and support of a social workforce.

INSTRUMENTS

- Service interventions, case management and referral services
- Development and support of a social workforce



ECONOMIC INCLUSION AND LABOR ACTIVATION:

Includes two dimensions 1 (labor regulations which aim to protect employees' rights to decent work, and 2) active labor market policies which aim to promote labor-market entry and access to better employment, assist reemployment by improving job readiness, and improve matching of supply and demand in the labor market.

INSTRUMENTS

- Labor regulations
- Active labor market policies
- Linkages with livelihoods and employment strategies



SOCIAL INSURANCE:

Contributory social protection, as it is funded by contributions paid by (or on behalf of) participants or taxation. As with other insurance mechanisms, the purpose of social insurance is to smooth the impact of risks associated to unemployment, disability, sickness and old age.

INSTRUMENTS

- Insurance for unemployment, maternity, disability, work accidents
- Old-age, disability, and survivors' pensions

A RAPID DIAGNOSIS OF THE CURRENT SITUATION

The Lebanese government is facing great challenges in responding to social needs and in protecting the most vulnerable within the accumulated crises that the country has been undergoing recently on the political, economic, financial, social and institutional levels. This section details the socio-economic vulnerabilities of Beirut residents affected by the Beirut Port explosion and residents at the national scale, in addition to the existing weaknesses limiting government institutions' ability to respond to the crisis.

SOCIO-ECONOMIC VULNERABILITIES

The Beirut blast has introduced new vulnerabilities among Beirut residents and exposed existing vulnerabilities that affect residents nationwide. The modules below demonstrate the current socio-economic situation for Beirut residents as well as the broader country context.

POVERTY

Steep increase in poverty rates in affected areas.

from respondents to a Lebanese Red Cross (LRC) survey.



80%
exhausted their savings



37%
had no source of income¹⁶.



90,000 people
in dire need for immediate humanitarian assistance following the explosion¹⁵.

Between 2019 and 2020



Ratio of **upper to middle-income** groups has declined from: **11.5% to 4.6%**²¹

Ratio of **lower to middle-income** groups has declined from: **45.6% to 35.2%**

Extreme poverty has increased from 16% in 2019 to 23% in 2020¹⁷.

2.7 million
people living below the upper poverty line

1.1 million
people living below the lower poverty line¹⁴.



BEIRUT RESIDENTS

NATIONWIDE¹³

FOOD CONSUMPTION



Food Intake Reduction
for 50-100% of residents in affected areas

assessed by ACTED in Nabaa, Bourj Hammoud, Quarantina, and Karm el Zeytoun¹⁹.

49%
of Lebanese are worried about their ability to access enough food.

31%
were unable to eat healthy and nutritious food over the course of a year¹⁸.



120% price increase

The CPI registered a yearly price increase of 120% from August 2019 to August 2020²⁰

BEIRUT RESIDENTS


NATIONWIDE

ACCESS TO HEALTH



 **6** hospitals

 **20** clinics

Sustained partial or heavy damages

capacity reduced by **500** hospital beds 
160,000 people affected

Collective capacity was reduced by 500 hospital beds and at least 160,000 people residing in the catchment area were affected²³.

 **50%** operational  **40%** need rehabilitation

from a preliminary mapping of 55 medical facilities within a 15 km radius of the blast.

BEIRUT RESIDENTS

only **56%** of the population has health insurance coverage²⁴

(noting that only 21% of Lebanese persons with disabilities have access to some form of health insurance)²⁵



COVID-19

Further strain has been put on the health system with the increasing transmission of COVID-19 (record high 14-day incidence rates as of September 2020)²².

NATIONWIDE

ACCESS TO EDUCATION

Reported damages from the explosion:

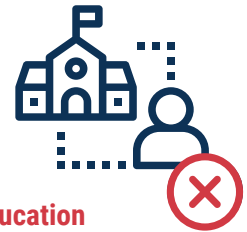
 **120** schools *public and private*  **8** universities

 **20** TVET centers

63,000 students affected²⁶
(Lebanese and non-Lebanese).




23.9% of Lebanese students ceased education due to economic reasons in the 2018-2019 school year²⁷.
(aged 3 - 24)



BEIRUT RESIDENTS

NATIONWIDE

ACCESS TO WELFARE SERVICES

 **LOSS OF CARE BY FAMILY MEMBERS**
(due to death or injury)

is expected to adversely affect children, persons with disabilities, older people, migrant workers, and other vulnerable groups that are highly dependent on their informal support network.

 **370/1000** respondents to a preliminary survey


ACKNOWLEDGE THE NEED FOR PSYCHOLOGICAL SUPPORT³⁰


noticeable increase in harassment violence or abuse




An Inter-agency SGBV Task Force Assessment Survey finds that up to 54% of respondents have observed an increase of harassment, violence or abuse against other women and girls in their household or their communities since the start of the COVID-19 pandemic²⁸.

Many persons with disabilities are not benefiting from schemes for which they are eligible:

4% prevalence of disability.


 **2.6%** of the population are disability card holders

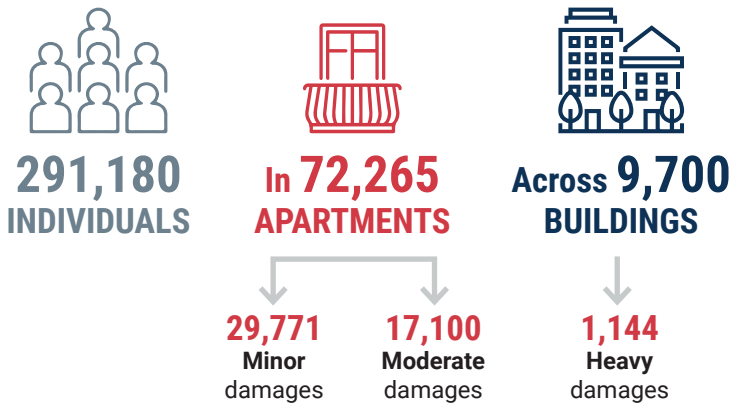
 **7.5%** of card holders receive welfare services from contracted institutions with MoSA
(8,523 Persons with disabilities)²⁹.

BEIRUT RESIDENTS

NATIONWIDE

ACCESS TO AFFORDABLE HOUSING

Damages directly impacting³¹



Various Beirut neighborhoods are at higher risk of gentrification, which directly affects the future stock of affordable housing.

Government budget for supported housing loans was reduced to

LBP 301 billion



88.3%

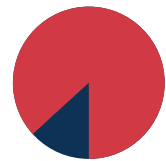
of the 2020 budget compared to the 2019 budget.



The reduced budget only covers

11% OF MARKET NEEDS

for subsidized housing loans³².



It is also worth noting that there is no mechanism for subsidized rentals amid continued price inflation and increase in poverty levels.

BEIRUT RESIDENTS

NATIONWIDE

INCOME SECURITY

Many vulnerable groups have become increasingly income insecure following the blast, particularly older people, persons with disabilities, women, and children, and families who have lost a breadwinner or had members injured by the blast³⁴.

OLDER PEOPLE (above 65 years of age)



92% of survey respondents to a survey conducted by the Ministry of Social Affairs identify older people as the most vulnerable group following the blast³³.

16.5% in Beirut Beirut district has one of the highest shares of older people relative to the total population (following Jezzine at 18% and Keserwan at 16.6%)³⁸.

This implies a higher dependency ratio and additional risk exposure to

INCOME INSECURITY



CHILDREN



37.5% of respondents identify children and women as the most vulnerable group following the blast.

564,000 Other studies show that in the Greater Beirut area children cannot afford their essential needs, including sufficient food³⁷.

The majority of workers in Lebanon have no access to social security (55% are informally employed and are not covered by social insurance scheme) **The coverage of social assistance schemes for the poor and vulnerable is extremely limited.**³⁵

OLDER PEOPLE (above 65 years of age)



11% of the total population³⁹

74.8% rely on their children to secure income⁴².



80% have no formal pension coverage⁴⁰.



A large share of men continue to work after the official age of retirement (41% between the age of 65-69, 29% 70-75 years)⁴¹

PERSONS WITH DISABILITIES



BEIRUT RESIDENTS

NATIONWIDE

LIVELIHOODS & EMPLOYMENT

50%-60% SMEs

in the areas highly affected by the blast are unable to resume their operations without aid⁴⁶.



100% Achrafieh

366 institutions



100% Mar Mikhael

158 institutions



100% Saifi

23 institutions



100% Gemmayze

90 institutions

1,408 businesses

out of 2,103 in the food and beverage industry in Greater Beirut were affected, in particular:



87% Downtown

100/115 institutions



44% Hamra

120/270 institutions

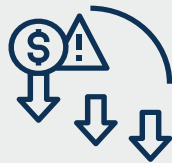


41% Verdun

35/86 institutions

\$315 million

Preliminary estimates of the losses in the industry in Greater Beirut, as well as Matn and Baabda districts⁵¹.



220,000

jobs were lost

between October 2019 and February 2020⁴³. It is also worth noting that prior to the financial crisis:



55%

informal employment⁴⁵



14-19% reduction in women's employment.

(Before the explosion), due to the economic recession.⁴⁴



Lebanon has:

THE HIGHEST gender gaps in the world⁴⁷.

THE LOWEST rates for female labor market participation⁴⁸.

This comes in addition to the fact that Lebanon ranks 145/153 countries in the World Economic Forum Gender Gap report 2020, with a 29% rates for female labor market participation (vs. 76% for men)⁵⁰.

Persons with disabilities face structural barriers in accessing labor market opportunities (labor force participation is 35 percentage points lower and informality 16 percentage points higher amongst persons with disabilities compared to the rest of the population)⁴⁹



GOVERNANCE AND INSTITUTIONAL RESPONSE CAPACITY

Lebanon's weak governance and institutional challenges in the social protection sector present a number of limitations that explain the inability of the government to respond to any crisis and more so to the implications of the Beirut Port explosion. Some of the major constraints in that regard are:



ARCHAIC ORGANIZATIONAL STRUCTURES IN PLACE

Weak organizational structures within public institutions result in a host of different shortcomings, namely a lack of coordination among different functions, slow decision-making, and a lack of alignment between functions and institutional objectives.



LACK OF POLICIES AND EFFICIENCY OF PROCEDURES AND PROCESSES

The lack of crisis management and social protection policies, enforcement mechanisms, and actionable roadmaps hinder public institutions from fully implementing their mandates.



INSUFFICIENCY AND WEAK COMPETENCIES OF HUMAN RESOURCES

Public institutions have a major lack when it comes to adequate human resources capable to respond adequately to such crises, in addition to clientelist loyalties of some public servants that makes any response dependent on political sponsors' will.



WEAK CONTROL AND ACCOUNTABILITY MECHANISMS

Control and accountability institutions such as Central Inspection, General Disciplinary Council, Civil Service Council, Court of Accounts and the Judiciary face serious challenges in terms of effectiveness, capacity and political interference⁹ to be able to play a role within the current crises.



MISMANAGEMENT OF FINANCIAL RESOURCES AND THEIR ALLOCATION ACCORDING TO NEEDS AND PRIORITIES

Most budgets allocated for social protection service delivery rely on "outsourcing", with high involvement and reliance on the private sector and faith-based organizations, while the rest is predominantly dedicated for public servants' salaries with little resources for ensuring social service quality.



INEFFECTIVENESS OF COORDINATION MECHANISMS TO AVOID DUPLICATION AND MISUSE OF RESOURCES

There is much duplication, fragmentation and lack of coordination between the different stakeholders involved in designing, administering, delivering, and enforcing social protection systems and instruments which paralyzes the government's ability to respond to such crises.

RECOMMENDATIONS FOR SHORT AND LONGER TERM RESPONSE



SHORT-TERM SOCIAL PROTECTION RESPONSE

Based on the rapid diagnosis of the current situation in Beirut previously detailed, two imminent priorities emerge in the context of the short-term social protection response:

- Alleviating the impact of the explosion on affected households through the implementation and scale-up of social protection interventions to achieve broader coverage, adequacy, and sustainability, while ensuring inclusiveness of vulnerable groups and reducing risks on the middle class.
- Ensuring the continuity of essential social services (health, education, welfare services, etc.) and expanding financial access to them.

With that, the following tables propose a series of immediate measures within each social protection pillar to respond to the crisis.

SOCIAL ASSISTANCE

1. Scale up **emergency cash-transfers** for low-income affected households, considering the diverse needs of the affected population⁵²
2. Reconstruct destroyed/damaged shelters or provide targeted compensation for households who have experienced damages or destruction of their home through **housing allowances for relocating families**, as well as **financial compensation for repairs** of lighter damages
3. Provide a **social pension** for all **older people and persons with disabilities** (including injuries and disabilities incurred as a result of the explosion) in affected areas
4. Design a tailored package of services for households with members who were affected by the explosion (death, injury, missing, disability, etc.) that is catered to their needs (including cash assistance, rehabilitation, tax deferral or exemption, access to social/health insurance, legal aid etc.).

ADDRESSED VULNERABILITIES & RISKS



POVERTY REDUCTION



INCREASED FOOD CONSUMPTION



IMPROVED ACCESS TO AFFORDABLE HOUSING

FINANCIAL ACCESS TO SOCIAL SERVICES

1. Initiate **outreach to affected vulnerable groups** and link them to functional PHCs in the area for essential health services
2. Increase **financial allocations to the Ministry of Public Health** to cover individuals who have lost formal social health insurance
3. Expand **mental health services** provided through strengthening primary healthcare centers, establishing community-based centers, and in-patient mental health wards within hospitals
4. Ensure **access to healthcare for older people** not covered by any social insurance scheme, as well as for **women and girls** (as they may be hindered from visiting their health care provider)
5. Advocate for the development of a **plan to ensure universal financial access to health care**, including through public-private partnerships
6. Reconstruct affected health facilities

ADDRESSED VULNERABILITIES & RISKS



IMPROVED FINANCIAL ACCESS TO HEALTH

HEALTH

1. Provide assistance to families with school-aged children through **cash support** for primary students (**transportation allowances, waivers on books and stationery, and coverage of other associated costs to education**) plus **fee reduction/cash transfers** for students in public secondary schools (as well as transportation allowances, waivers on books and stationery, and coverage of other associated costs to education)
2. Restore affected schools

ADDRESSED VULNERABILITIES & RISKS



IMPROVED FINANCIAL ACCESS TO EDUCATION

EDUCATION

SOCIAL WELFARE

1. Provide relevant protection, prevention, response services, particularly expanding **access to specialized services** for persons with disabilities (blast-related or pre-existing), older people, women and children, households that have lost breadwinners, and other highly dependent vulnerable groups
2. Engage with affected communities and enhance **community outreach** to identify vulnerable groups, leveraging local community-based programs/ networks/ actors for designing effective targeting, delivery, and implementation mechanisms
3. Build on the capacity of existing **protection hotlines** to absorb increased volume of claims
4. Establish **safe spaces** for children, women and other vulnerable groups in affected areas with integrated protection services (prevention and response)
5. Provide **mental health and psychosocial support** for those impacted by the blast, particularly for children
6. Restore affected SDCs, and explore supporting mobile service units

ADDRESSED VULNERABILITIES & RISKS



IMPROVED ACCESS TO QUALITY WELFARE SERVICES

ECONOMIC INCLUSION AND LABOR ACTIVATION

1. Establish **emergency cash-for-work/employment intensive programs** for vulnerable workers as a means for immediate employment creation (paying particular attention to exclusion risk for female workers and refugees)⁵³
2. Initiate other **labor market activation measures** to ensure business continuity, particularly to SMEs (wage subsidies, business continuity plans, cash-flow and investment support, tax exemptions, etc.)

ADDRESSED VULNERABILITIES & RISKS



IMPROVED LIVELIHOOD AND EMPLOYMENT OPPORTUNITIES

SOCIAL INSURANCE

1. Establish an **emergency unemployment insurance scheme** for all workers who have (temporarily) lost their jobs as a result of the blast – where relevant linked to labor activation measures
2. Establish an **emergency employment accident/injury compensation scheme** for all workers who have suffered injuries as a result of the blast and were not covered by an employment injury policy by their employer, linked with rehabilitation and labor market inclusion
3. **Extend health insurance coverage (under NSSF)** in the areas affected by the blast, especially for all those who have become unemployed

ADDRESSED VULNERABILITIES & RISKS



IMPROVED INCOME SECURITY IN OLD AGE

LONGER-TERM SOCIAL PROTECTION RECOVERY

Acknowledging that the response phase is subsequently followed by a period of recovery, immediate measures should also be complemented with medium and long-term initiatives that feed into a comprehensive, inclusive and sustainable national social protection framework and address some of the contextual factors that hamper equitable access to social protection¹⁰. In that context, it is critical to expand the range and scope of social protection on the national scale to fully address multi-dimensional risks, while enhancing preparedness to accommodate new vulnerable groups in need.

The comprehensive and inclusive social protection framework would be guided by the following strategic orientations across each social protection pillar:

SOCIAL ASSISTANCE

1. Introduce a national social assistance system that can provide direct income support to vulnerable groups in need and enhance crisis preparedness through horizontal and vertical scaling-up.
2. Ensure that the design of social assistance programs⁵⁴ includes:
 - Selection mechanisms which are evidence-based, transparent, gender, disability- and age-sensitive, and address both poverty and life-cycle vulnerabilities.
 - Linkages to other essential services and opportunities for productive inclusion that can enhance the poor's participation in the labor market.
3. Design an effective transition strategy for the eventual reform of subsidies, ensuring that mitigation measures are in place prior to any reforms to:
 - Reduce the adverse effects on those who are poor, vulnerable and the middle class.
 - Promote higher inclusion and reduce inequalities that could arise with the lifting of subsidies.



FINANCIAL ACCESS TO SOCIAL SERVICES⁵⁵

1. Health: Ensure universal health coverage by reducing fragmentation and inequities across health financing regimes, as well as increasing investment in primary and preventive care.
2. Education: Expand capacity of public schools and TVET institutions and increase financial access to them.



ECONOMIC INCLUSION & LABOR ACTIVATION

1. Develop gender and disability sensitive active labor market policies that are coherent and integrated (labor regulation and enforcement of labor rights, public employment services, employment incentives in the private sector, capacity building programs, etc.)



SOCIAL WELFARE

1. Rationalize and reallocate spending on care services to ensure compatibility with the assessed needs of individuals/households.



SOCIAL INSURANCE

1. Reduce fragmentation in social security systems, extend coverage to include more vulnerable workers (e.g. self-employed, temporary, seasonal, etc.) and expand the scope of benefits to account for various lifecycle risks (e.g. long term old age and disability pension benefit, unemployment insurance, etc.).



Based on the above-mentioned strategic orientations and numerous consultations with national stakeholders, the tables that follow detail – for each of the five social protection pillars – recommendations for programmatic interventions, long-term institutional reforms that are a prerequisite for developing a comprehensive and inclusive social protection system, as well as the relevant stakeholders in the public sector.

It must be noted that the proposed recommendations are for the development of national systems, that should be accessible at least by legal residents, including migrant workers. Furthermore, acknowledging that social protection is a human right, the role of the state as the custodian of socio-economic rights should expand to provide equal protections for all residents in accordance with international human rights treaties that Lebanon is party to. Thus, policy makers should increasingly consider alignment and inclusion of mechanisms for protection of groups with special status (refugees and unregistered migrants) in the national social protection system as this could also be a way to align domestic, humanitarian, and development financing flows.



SOCIAL ASSISTANCE

RELEVANT PUBLIC INSTITUTIONS

Ministry of Social Affairs (MoSA) (through the National Poverty Targeting Program/ Rights and Access Program)

Ministry of Economy and Trade (subsidies)

Ministry of Finance

Ministry of Energy and Water (subsidies)

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. Embed **shock responsiveness** into the design of existing social assistance schemes
2. Improve design and **scale-up social assistance programs** to include:
 - **An anti-poverty cash-based social assistance program** (building on the National Poverty Targeting Program/Emergency Social Safety Net Program)
 - **Social grants to address life-cycle vulnerabilities** (old-age social pension, disability allowance, child grant, etc.)
3. Ensure income security for all citizens through a **universal social pension** and a **universal disability allowance**
4. Put in place a **transition strategy** for the eventual reform of subsidies, putting in place adequate mitigation measures to **reduce the adverse effects on the poor, vulnerable and the middle class** (with particular consideration to access to essential needs, basic services, food security and nutrition). The adjustment package should include:
 - **Compensation schemes** that address the inflationary effect of subsidy lifting and thus protect households from real income losses and erosion of value
 - **Recognize the specific vulnerabilities of different groups** (including non-nationals) depending on lifecycle, employment and family composition considerations
 - **Work towards the progressive improvement of permanent and inclusive social protection instruments** financed from the “subsidy dividend” (i.e. additional fiscal space created). This also includes increasing financial allocations for subsidized housing loans to low-income groups.

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Develop linkages between social assistance programs and other programs (livelihood opportunities, public works, labor market activation, health, education and social welfare, etc.), including alignment with existing safety nets for refugees
2. Scale up investments in social safety net infrastructure such as social registries, systems for identification, communication, grievance and complaints management, payment and monitoring and evaluation, paying particular attention that targeting mechanisms are evidence-based, transparent, gender, disability - and age-sensitive.
3. Put in place necessary transparency and anti-corruption measures such as third-party monitoring, technical audit, communications, program monitoring, etc.



FINANCIAL ACCESS TO SOCIAL SERVICES

HEALTH

RELEVANT PUBLIC INSTITUTIONS

Ministry of Public Health (MoPH)

Primary Healthcare Network

National Social Security Fund and other Social Security Funds

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. Reduce **financial burdens** on families, specifically **Out-of-Pocket (OOP) expenditures**
2. Establish **integrated national policies for awareness and prevention**, including a clear distribution of roles between the concerned ministries and public agencies

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Develop a national strategy to ensure universal financial access to health care, reduce fragmentation across different schemes (by unifying standards, tariffs, information systems, contract mechanisms, procurement, etc.), and align tax and contribution-based financing
2. Activate healthcare regulatory and supervisory mechanisms.

EDUCATION

RELEVANT PUBLIC INSTITUTIONS

Ministry of Education (MEHE)

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. Reduce school dropout by addressing the economic, social and psychological causes that drive students out of the education system⁵⁶, including:
 - Improving the **school environment**
 - Providing **social and financial assistance** to parents
 - Expanding **inclusive education**
 - Protecting children from **various forms of violence**
 - Developing early **identification/ intervention programs**
2. Improve **access to high-quality vocational and technical education** and strengthen links with the labor market

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Strengthen coordination and develop effective referral mechanisms between MEHE, MoPH, MoSA, MoJ, and other relevant public and private entities
2. Reallocate resources in MEHE subsidy programs for free private schools to improve access and equity
3. Reduce fragmentation in the provision of Technical and Vocational Education and Training (TVET)



SOCIAL WELFARE

RELEVANT PUBLIC INSTITUTIONS

Social Development Centers (MoSA)

NGO contracts (with MoSA, MoJ MoPH)

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. **Enhance the coverage of programs** that provide direct services to marginalized groups (specifically those not currently covered) and complement this by enhancing legal protection for marginalized groups
2. Develop more **family/community-based welfare programs** to achieve the inclusion of marginalized groups, resorting to institutionalization as a last measure

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Develop a results-based framework for social welfare services, ensuring rigorous quality control of welfare services by enhancing the supervisory capacity of the Ministry of Social Affairs
2. Develop integrated and well-established data systems for evidence-based programming
3. Develop a comprehensive system for referral, case management, and coordination



ECONOMIC INCLUSION AND LABOR ACTIVATION

RELEVANT PUBLIC INSTITUTIONS

Ministry of Labor

National Employment Office

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. **Secure workers' rights** by updating the relevant laws and ensuring their implementation, paying particular attention to **address gender and other forms of discrimination** in labor legislation (equal rights to employment in certain occupations, etc.)
2. Introduce a **mechanism for indexation of the minimum wage** such that it is commensurate with the current cost of living
3. Establish policies and implementation mechanisms to **integrate marginalized groups into the workforce**, particularly ensuring inclusive environments for **persons with disabilities** (including the enforcement of the 3% quota), and **encouraging women's entry and retention** in the labor market (support for female-owned enterprise, enforcement of gender-sensitive employment practices such as flexible working hours, childcare support, improve current provisions on paid maternity and paternity leave to enable women to remain in the labor market etc.)

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Develop capacity for implementation and enforcement of relevant laws (inspection bodies, labor arbitration councils, etc.), particularly ensuring employer compliance with labor protections
2. Activate the National Employment Office such that it plays a larger role in matching labor market supply and demand, as well as addressing the skills mismatch and other labor market inefficiencies



SOCIAL INSURANCE

RELEVANT PUBLIC INSTITUTIONS

Ministry of Labor

Public Sector Schemes for Social Security (Cooperative of Civil Servants/ 4 Security Sector Schemes)

National Social Security Fund (NSSF)

Mutual Funds

MEDIUM-TERM PROGRAMMATIC RECOMMENDATIONS FOR THE NATIONAL SOCIAL PROTECTION FRAMEWORK

1. Fast track **pension reform** to create combined better contributory system with a non-contributory tax-financed social pension component
2. Expand the **scope of social insurance benefits** to address more life cycle risks, particularly unemployment insurance, social health insurance coverage for the unemployed, and a maternity insurance scheme funded through the NSSF
3. Progressively ensure that currently **excluded vulnerable workers** (such as self-employed, temporary, seasonal, agricultural workers, etc.) are adequately **covered by a social insurance scheme**
4. **Address gender discrimination in social protection related legislation.** For example: reform the social security law so that benefits are extended equally to spouses of working individuals.

RECOMMENDATIONS FOR LONG-TERM INSTITUTIONAL REFORMS

1. Ensure the financial sustainability of social insurance schemes and preserve the real value of their assets, paying particular attention to recapitalizing the NSSF and reforming the public sector pension system
2. Reduce fragmentation in social insurance schemes by unifying benefit terms based on the principles of equity and inclusiveness
3. Increase the effectiveness of social insurance schemes through automation and coordination (unified digital social security number)
4. Reform the NSSF governance model so that it becomes more effective, transparent, and has multi-stakeholder representation with strict requirements for social insurance expertise

PROPOSED INSTITUTIONAL MECHANISM

In order to ensure an efficient and transparent targeted response to the crisis, a wide variety of actors must be engaged, and a multi-stakeholder crisis platform should be in place. Below is an overview of a model that can be in place specifically for the social protection response but can also be adopted for the governance of the 3RF more broadly. A more in-depth proposal for a multi-stakeholder institutional mechanism is elaborated on separately¹¹.

Learning from previous crises that Lebanon has endured, there are several pitfalls that can lead to inefficient allocation of resources, mis-targeting the most vulnerable of the affected community, and falling into clientelist practices based on political loyalties, particularly in times when the country is lacking resources and international support is limited. In this context, we highlight the following pitfalls:

- **Sidelining citizens' solidarity initiatives by civil society groups**, NGOs and private networks, resulting in losing citizens' engagement on the longer term.
- **Lack of coordination mechanisms** between international partners, local actors and government institutions resulting in duplication of efforts and misuse of resources.
- **Weak procurement practices for reconstruction and recovery** resulting in corrupt practices and unethical gains in favor of clientelist networks of businesses and NGOs.
- **Excluding public institutions from coordination platforms**, as a means to punish weak governance, resulting in further weakening of government and rendering it unequipped for a future sustainable response.
- **Decentralizing data management pertaining to needs and priorities** through various stakeholders rather than using centralized information management systems that allow data integration and sharing, which results in the incoherent definition of needs and priorities, duplication and lack of transparency.

NEEDS MAP BY IDEMA

A CASE STUDY FROM TURKEY

Digital tools for needs identification during times of crisis

Turkey's NeedsMap presents a successful model in learning and verifying the social needs in different localities, as well as mobilizing citizen groups to support their own communities. The digital tool is a peer to peer map-based platform, which embeds a data visualization and online collaboration system to facilitate humanitarian aid delivery (based on in-kind transfers). It matches basic needs of individuals (e.g. clothes, etc.) as well as needs for NGOs, public schools, cooperatives, voluntary groups, social platforms and community centers (e.g. volunteers, stationery, office furniture, etc.).

In 5 years, more than 100,000 people in need and 20,000 supporters have used the platform, with only 7 employees and support from roughly 10,000 volunteers in 48 universities all over Turkey.

The strength of the platform can be attributed to the following:

- Multi-stakeholder engagement: civil society, private sector actors, municipalities and Chambers of Commerce.
- Data driven technologies: advanced GIS/mapping, fintech systems, blockchain technology, etc.
- Transparency: data visualization and segmentation make it possible for all relevant stakeholders to act accordingly, where local authorities have high visibility on the needs of their respective districts, companies are more agile in implementing CSR projects for specific target groups as necessary, etc.

Source: https://www.ilo.org/global/topics/cooperatives/news/WCMS_644385/lang-en/index.htm

Thus, a multi-stakeholder platform should be established for the crisis response respecting the following principles:

LOCAL

Any response platform should be established at a local level to create higher proximity, engagement and accountability between citizens and the response platform, which can also be scalable as a model on a national level, paying particular attention to avoiding national clientelist networks.

INCLUSIVE

Any response platform should be inclusive of all civil society, NGOs, private sector, academia, government entities and international partners to strengthen coordination, efficiency and trust in response measures.

PARTICIPATORY	Any response platform should be participatory throughout the process from needs identification, prioritization, allocation of resources, coordination of efforts, implementation mechanisms and monitoring of impact.
SUSTAINABLE	Any response platform should be established with the intent to institutionalize it as a framework for any future social protection response allowing higher inclusion, participation and integration of programs and services.
TRANSPARENT	Any response mechanism should be evidence-based using digital platforms for data integration, update, and sharing, thus allowing for a more targeted and transparent social protection response.

THE FOLLOWING ACTORS SHOULD BE INCLUDED IN ANY MULTI-STAKEHOLDER PLATFORM:

- Citizens Initiatives including NGOs, volunteer networks and civil society groups...
- Private Sector including local SMEs, syndicates and professional networks...
- Academic Institutions including universities, think tanks and experts' networks...
- Military Forces including the army, forward emergency room and other security forces...
- National Government including ministries, public agencies, and local government...
- International Partners including multilateral organizations, development partners and INGOs...

The following functions should be assumed by a multi-stakeholder platform to reflect true engagement of the different stakeholders in decision making that can eventually improve trust between citizens and the state:

Needs Assessment¹² as a continuous evidence-based exercise that can provide a baseline for citizens' priorities and risk factors that might erupt throughout the response activity.

Prioritization of Needs based on urgency and in relation to availability of resources to be able to better target the most vulnerable and those at high risk.

Resources Allocation provided by government or international governmental and non-governmental actors in an efficient and transparent manner away from clientelism and corruption.

Coordination of Response Efforts between the different local and international stakeholders, programs and measures that would allow proper transfer of knowledge for future sustainability.

Implementation of Response Instruments by a clear division of roles and responsibilities based on a set of criteria pertaining to capacity, competence and understanding of the context.

Monitoring Impact of all initiatives agreed upon within the platform to adjust response strategies and tactics but also to share results with the general public that incentivize higher citizens' engagement and collaboration.

The above platform becomes increasingly possible and feasible if it integrates within its operating model a digital platform that facilitates multi-stakeholder engagement, thus driving further efficiencies while simultaneously helping to inform and engage the general public.

A multi-stakeholder collaborative social protection response is highly needed to appease the devastating implications of the Beirut Port explosion on the most vulnerable, but it should also prepare for a more universal, rights-based and comprehensive framework for social protection in times when most of the population is at risk and government resources are scarce.

ENDNOTES

- 1 The 3RF - under development at the time of preparation of this paper - is meant to provide roadmap to operationalize findings from the Beirut Rapid Damage and Needs Assessment and set ground for comprehensive medium-term reform, recovery and reconstruction program based on a “whole of Lebanon”.
- 2 This background paper builds on the United Nations Position Paper on Social Protection in Lebanon (February 2020) and integrates the UN vision with inputs received so far as part of the consultations for developing the National Social Protection Strategy.
- 3 In the Lebanese context, while social protection schemes for nationals and non-nationals are separate, it is worth highlighting the need to increasingly align these parallel systems.
- 4 The Institute of International Finance (2020)
- 5 International Monetary Fund, *World Economic Outlook – The Great Lockdown* (2020)
- 6 Central Administration of Statistics (2020)
- 7 World Bank, *Forecasting Poverty Among Lebanese Population, March 2020 (unpublished Technical Note)*; Economic and Social Commission for Western Asia (ESCWA), *Poverty in Lebanon: Impact of Multiple Shocks and Call for Solidarity* (2020)
- 8 World Food Programme, *Assessing the Impact of the Economic and COVID-19 Crises in Lebanon* (June 2020)
- 9 The absence of a transparent and independent judiciary is a significant factor which affects marginalized groups from seeking access to public services and mechanisms, in turn weakening trust in government and preventing an inclusive social contract from being built.
- 10 Particularly for non-nationals or stateless individuals, difficulties in obtaining legal residency, the lack of ID & civil status documentation, discriminatory provisions in laws and policies, as well as negative attitudes and behaviors also hinder their access to essential social services.
- 11 Beyond Group, *Multi-stakeholder Coordination Response for the Beirut Blast* (2020)
- 12 There is a need for Area-Based approaches to ensure a comprehensive needs analysis and to uncover interlinked social and protection needs, which can serve as a vehicle to develop localized response/action plans.
- 13 Many vulnerability indicators have deteriorated further due to the social and economic implications of the various crises that Lebanon has been faced with. The figures represent the most recently published available data.
- 14 World Bank; Economic and Social Commission for Western Asia (ESCWA), *Poverty in Lebanon: Impact of Multiple Shocks and Call for Solidarity* (2020)
- 15 World Bank, *Beirut Rapid Damage and Needs Assessment (RDNA)* (2020)
- 16 Office for the Coordination of Humanitarian Affairs (OCHA), *Flash Appeal* (2020)
- 17 World Bank; Economic and Social Commission for Western Asia (ESCWA), *Poverty in Lebanon: Impact of Multiple Shocks and Call for Solidarity* (2020)
- 18 World Food Programme, *Lebanon Country Strategic Plan 2018-2021* (2020)
- 19 Central Administration of Statistics (2020)
- 20 Office for the Coordination of Humanitarian Affairs (OCHA), *Flash Appeal* (2020)
- 21 World Bank; Economic and Social Commission for Western Asia (ESCWA), *Poverty in Lebanon: Impact of Multiple Shocks and Call for Solidarity* (2020)
- 22 Ministry of Public Health Data (2020)
- 23 Office for the Coordination of Humanitarian Affairs (OCHA), *Flash Appeal* (2020)
- 24 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 25 EU-MADAD, *FPS survey on health and disability* (2019)
- 26 Strategy&, *Beirut Explosion Impact Assessment Status Update #1* (2020)

- 27 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 28 Inter-Agency Sexual and Gender Based Violence Task Force, *Gender Alert on COVID-19 Issue No. 3* (2020)
- 29 Ministry of Social Affairs Data (2019)
- 30 Strategy&, *Beirut Explosion Impact Assessment Status Update #1* (2020)
- 31 Office for the Coordination of Humanitarian Affairs (OCHA), *Flash Appeal* (2020)
- 32 Elnashra.com (2020), مليون دولار للفروض السكنية .. فهل اقترب الحل؟
- 33 Ministry of Social Affairs, *Rapid Needs Assessment for the Population Affected by the Beirut Port Explosion* (2020)
- 34 The blast has had high implications on non-Lebanese vulnerable groups in Beirut and nationwide (particularly migrant workers and Syrian refugees), rendering them increasingly income insecure. There has been an increasing trend of abandonment and withholding of wages for migrant workers since the financial crisis, and 60% of Syrian refugees have either been laid-off or experienced a reduction in their wages (from an average of 365,000 LBP to 77,000 LBP) since the COVID-19 pandemic.
- 35 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 36 Center for Studies on Aging, *Older Population in Lebanon: Facts and Prospects* (2011)
- 37 Save the Children (2020)
- 38 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 39 Center for Studies on Aging, *Older Population in Lebanon: Facts and Prospects* (2011)
- 40 Center for Studies on Aging, *Older Population in Lebanon: Facts and Prospects* (2011)
- 41 HelpAge International, *Towards a Rights-Based Social Protection System for Lebanon* (2020)
- 42 Center for Studies on Aging, *Older Population in Lebanon: Facts and Prospects* (2011)
- 43 World Bank, *Beirut Rapid Damage and Needs Assessment (RDNA) , Social Protection and Jobs Chapter* (2020)
- 44 UN Women, *2020 Beirut Port Explosion Response Plan* (2020)
- 45 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 46 ACTED (2020)
- 47 UN Women, *2020 Beirut Port Explosion Response Plan* (2020)
- 48 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 49 Central Administration of Statistics/International Labour Organization, *Labour Force and Household Living Conditions Survey* (2018/2019)
- 50 UN Women, *2020 Beirut Port Explosion Response Plan* (2020)
- 51 Restaurant Owners Syndicate (2020)
- 52 It is also important to ensure that cash-interventions are nutrition sensitive , such that they address the needs of the nutritionally vulnerable (children under 5, pregnant and lactating women, older people, etc.) through improving food security and household purchasing power for nutritious foods.
- 53 It is also important to ensure a market approach to cash-for-work initiatives to ensure that these such measures do not negatively influence already existing businesses.
- 54 It is also important to ensure alignment of the social assistance system to the system of humanitarian assistance for refugees.
- 55 Alignment with existing systems for subsidizing healthcare and the provision of education services for refugees must also be ensured.
- 56 In this context, it is important to consider barriers to access to education for refugee children as well.